

## Phoenix Contact USA PRIVACY POLICY

We are delighted that you are interested in our company, products, and services. We are committed to maintaining the accuracy, confidentiality, and security of your Personal Information (as defined below). As part of that commitment, our Privacy Policy governs Phoenix Contact USA's ("Phoenix Contact," "us" or "we") actions as they relate to the collection, use and disclosure of Personal Information.

This Privacy Policy applies to any Personal Information we collect or receive about you, from any source, including through our websites and other online platforms (collectively, the "Sites"). We encourage you to read this Privacy Policy before providing us with any Personal Information and before using any of the Sites. By providing us with any Personal Information or using any of the Sites, you are signifying that you agree with all the terms of this Privacy Policy, so please do not do so if you disagree with any part of this Privacy Policy.

### WHAT IS PERSONAL INFORMATION?

"Personal Information" is any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household. Your Personal Information may include, but is not limited to, your name, mailing address, phone numbers, gender, email address, IP address, identification numbers, account information, biometrics, internet activity, etc.

### PURPOSE

#### Why do we collect, use or disclose your Personal Information?

We may collect, use and disclose your Personal Information for a variety of reasons, including, creating an account, sending you information and communications, responding to product inquiries and other requests, conducting contests and promotions, processing transactions, optimizing your experience on our Sites, and for internal purposes such as analyzing and managing our business, security, and improving our products, services, and promotion efforts. In certain circumstances consent may be implied, such as where your name, address and payment information is provided as part of the order process. Any Personal Information provided by you or otherwise collected on our Sites will only be used for the purpose it was originally provided or collected.

We may also use, or disclose your Personal Information, if we have reason to believe that using or disclosing such information is necessary to protect our rights, safety or property, including by detecting and preventing fraud. We may also use your Personal Information as otherwise permitted by law.

### COLLECTION OF PERSONAL INFORMATION

#### How do we collect your Personal Information?

Your Personal Information may be collected in the following ways:

- Directly from you as you use one of our Sites - for example, by creating an account, entering a contest, signing up for email communications, registering on our Sites, or participating in a survey;
- Data processing – For security and technical reasons, we automatically collect and save information transmitted by your browser to our system protocols. This includes, for

example, browser type/version, operating system used, referrer URL (the website that referred you to ours), host name and full IP address of the computer accessing the Site, data and time of call, data volumes and file types called, and country of origin.

- We sometimes collect Personal Information from you through third party service providers.

We may also collect anonymous information of users on our Sites. This anonymous information is collected for Phoenix Contact's internal use to analyze and continually optimize our Sites, for example, enhance website security and performance, detect broad demographic trends, assist us in providing content tailored to your interest and to otherwise enhance your experience. This information is obtained and processed exclusively for the Phoenix Contact Group and under no circumstances used for other purposes or resold.

### Do we use "cookies"?

We may use a "cookie" or similar technology to assist us to customize our Sites. Cookies are small text files that are stored on your computer and are saved by your browser. They are used to make our Sites more user-friendly, effective and secure. For example, they enable the technical implementation of a user session in Phoenix Contact's online catalog. These cookies also provide information which enables us to optimize our Sites in line with user requirements, e.g., direct link to localized websites by entering the [www.phoenixcontact.com](http://www.phoenixcontact.com) address.

Most cookies used by us are transient cookies. These are automatically deleted once you exit our website. However, some cookies are persistent for a longer period of time.

If you wish to prevent cookies from being saved, select "Do not accept cookies" under your browser settings. Please note, declining cookies may significantly impair your use of our Sites. For example, several functions will no longer be available.

## **CONSENT**

### When and how do we obtain consent?

Consent is required for the collection, use or disclosure of Personal Information except where required or permitted by law. Providing us with your Personal Information is always your choice. However, your decision not to provide certain information may limit our ability to provide you with our products or services. Your consent to the collection, use, or disclosure of information is not a condition to the supply of a product or service, except as necessary to supply the product or service.

We obtain your consent prior to collecting, using or disclosing your Personal Information for any purpose. The form of consent that we seek, including whether it is express or implied, will largely depend on the sensitivity of the Personal Information and the reasonable expectations you might have under the circumstances. In limited circumstances, we may rely on a third party to obtain your consent to the sharing of your Personal Information with us.

See the Phoenix Contact Communications section below to learn how you can revoke your consent to our use of your Personal Information.

### Phoenix Contact Communications

Through our Sites and various offline means, you may sign up or opt-in to receive communications from Phoenix Contact (i.e. our newsletter or promotional materials). Each communication sent to you by Phoenix Contact contains an "unsubscribe" link or other unsubscribe mechanism, allowing you to opt-out at any time.

## **USE AND DISCLOSURE OF PERSONAL INFORMATION**

Personal Information will only be used or disclosed for the purposes for which it was collected unless you have otherwise consented, or when it is required or permitted by law.

### How long will we use, disclose or retain your Personal Information?

We will use, disclose or retain your Personal Information for as long as necessary to fulfill the purposes for which it was collected and as permitted or required by law.

### Service Providers and Personal Information

We may use service providers (including our affiliates) to help us operate our business and our Sites and to administer activities on our behalf, such as sending emails, fulfilling orders, and conducting contests, events and promotions, customer service purposes, or to provide you with information regarding products or services. When disclosing Personal Information to such third parties, we will limit this to the information necessary to provide the respective services. Each of our service providers are required by contract or other binding means to keep your Personal Information confidential and to handle your Personal Information only to perform the required service or necessary transaction.

We will not share, sell or otherwise provide your Personal Information to third parties for marketing purposes.

### What about User Generated Content?

From time to time, we may receive content from you as part of contests, promotions, surveys and other functions of our Sites ("User Generated Content"). Any User Generated Content you submit may be publicly displayed, including on our Sites, and is subject to any terms and conditions communicated to you as part of the submission process. Please remember that any information you disclose in connection with a User Generated Content submission may become public information and you should exercise caution when deciding to disclose your personal, financial or other information in a submission. Phoenix Contact cannot prevent such information from being used in a manner that may violate this Privacy Policy, the law or your personal privacy and safety and Phoenix Contact is not responsible for the results of such postings.

## **THIRD PARTY WEBSITES/SERVICES**

### Third Party Websites

Our Sites or other correspondence may contain links to other websites that are not operated by Phoenix Contact. Although we endeavor to only link sites with high privacy standards, our Privacy Policy will no longer apply once you leave our site. PHOENIX CONTACT IS NOT RESPONSIBLE FOR THE PRIVACY PRACTICES OR THE CONTENT OF SUCH OTHER WEBSITES, INCLUDING WEBSITES OPERATED BY AFFILIATED ENTITIES. We provide such links only as convenience and the inclusion of the link on any of our Sites or correspondence does not imply endorsement of the linked website by Phoenix Contact. Therefore, we recommend that you review the privacy policies of those third party sites to learn how your information may be collected, used, shared and disclosed before using the sites.

## **ACCURACY, ACCESS AND SECURITY**

### How do we know if the Personal Information is accurate?

We will ensure that your Personal Information is kept as accurate, complete and up to date as possible. We do not routinely update your Personal Information, unless such a process is necessary. We rely on you, from time to time, to supply us with updates to your Personal Information, when required.

#### What if the Personal Information we have for you is inaccurate?

You may at any time, contact us to review, correct, update or otherwise modify the Personal Information we have for you.

Note that despite any request for a change to or removal of your Personal Information, we may need to retain certain information for recordkeeping purposes, and there may also be residual information that will remain within our databases and other records, which will not be removed or changed.

#### How do you access your Personal Information?

Upon request, you will be informed of the existence, use and disclosure of your Personal Information, and will be given access to it. You may verify the accuracy and completeness of your Personal Information, and may request that it be amended, if appropriate. However, in certain circumstances permitted by law, we will not disclose certain information to you. For example, we may not disclose information relating to you if other individuals are referenced or if there are legal, security or commercial proprietary restrictions.

#### How do we know that it is really you requesting your Personal Information?

We may request that you provide us with sufficient identification before granting you access to information regarding the existence, use or disclosure of your Personal Information. Any such identification information shall be used only for this purpose.

#### Where do we store your Personal Information?

We store your Personal Information in our offices in the United States, as well as in the data centers of our global affiliates and, when applicable, with third party providers. While your Personal Information is stored by our global affiliates in other countries, it may be subject to disclosure to the governments, courts, law enforcement or regulatory agencies in such countries, pursuant to applicable laws.

Our service providers may, from time to time, also hold your Personal Information in connection with the purposes for which you provided your consent. We may keep a record of your Personal Information, correspondence or comments in a file specific to you.

#### What safeguards have we implemented to protect your Personal Information?

Personal Information will be protected by security safeguards that are appropriate to the sensitivity level of the information. We take all reasonable precautions to protect your Personal Information from loss or theft, unauthorized access, disclosure, copying, use or modification. The only personnel who are granted access to your Personal Information are those with a business “need-to-know” or whose duties reasonably require access to such information.

#### What type of security do we provide on our Sites?

The security of all Personal Information collected through our Sites is of utmost importance to us. We have taken reasonable technical, contractual, administrative and physical security steps to

protect the Personal Information collected from you through the Sites, consistent with standard industry practice and the sensitivity of the Personal Information collected.

Our website is scanned annually by a third party for security holes and known vulnerabilities in order to make your visit to our site as safe as possible.

To ensure confidentiality of communications with you, we use specific functions of SSL encryption. The encryption used by Phoenix Contact is regarded as secure. Older operating systems and browsers may not be able to achieve this security level. If necessary, you should update the operating system and browser on your PC to enable use of this high-grade encryption.

Please note, there are things that you can do to help protect the security of your Personal Information. For instance, you should never give out your username or password. You should also sign out of your account and close the browser window each time you finish using the Internet so that others using the same computer will not have access to your information.

#### Who do I contact with questions or concerns about this Privacy Policy?

Upon request, we will make information available to you about our policies and practices with respect to the management of your Personal Information.

Should you have any questions that have not been addressed by this Privacy Policy or you require more detailed information regarding a specific point, then please do not hesitate to contact us.

Please contact us at:

Phoenix Contact  
586 Fulling Mill Road  
Middletown, PA 17057  
info@phoenixcontact.com

Please appreciate that we require proof of identification to handle any request regarding your Personal Information.

#### **PRIVACY POLICY UPDATES**

We reserve the right to make changes to this Privacy Policy. Such changes will take effect immediately upon posting. By continuing to interact with us following such changes, including by using our Sites, you will be deemed to have agreed to such changes. If you do not agree with the terms of this Privacy Policy, please do not continue using our Sites.

We will treat Personal Information in a manner consistent with the version of the Privacy Policy under which it was collected, unless we have your consent to treat it differently.

#### **CALIFORNIA PRIVACY RIGHTS**

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights, visit <https://oag.ca.gov/privacy/privacy-laws>.

#### **GOVERNING LAW**

This Privacy Policy is governed, construed, and enforced in accordance with the laws of the Commonwealth of Pennsylvania, without consideration of any conflict of laws provisions. All disputes relating to this Privacy Policy shall be subject to the jurisdiction of and venue in the state and federal courts of Dauphin County, Pennsylvania. To the extent permitted by applicable law, you hereby submit to this jurisdiction and venue and waive any defense of *forum non conveniens*.