

CHROMALLOY

CUSTOMER PRIVACY NOTICE

May 2018

1. NOTICE STATEMENT

Chromalloy UK Ltd, Chromalloy Holland BV, Chromalloy France SAS, Malichaud Atlantique SAS, Trac Precision Machining Ltd, Trac Precision Engineering Ltd, Trac Precision Tooling Ltd, TSL Ltd and TRT Ltd (individually each and collectively, the "**Company**") has prepared this Customer Privacy notice (the "**Notice**") to describe its practices regarding the collection, use, storage, transfer and other processing of individually identifiable information about customers ("**Personal Data**"). The Company is the controller responsible for the Personal Data that we collect and process as described in this Notice. For the purposes of this Notice, "**Customer**" means:

- Individuals employed by a company requesting information or a quote;
- Individuals employed by a company with whom we have a contractual obligation

2. WHAT PERSONAL DATA WE COLLECT AND HOW WE USE IT

We collect information identifying you when you contact us to request information, a quote, or to fulfil our contractual obligation to your company. We use this data to:

- provide the information requested to you;
- provide you a quote for our goods and services;
- inform on progress of our contractual obligations;
- screen you against the various "Watch Lists" maintained by government agencies in the USA, EU and by the United Nations to confirm we are not prohibited by law, regulation or government sanction from having any form of business transaction with you.

We may also use this data, if you agree, to send you updated capability information, and invitations to internal and external professional events. If you consent to receive newsletters and invitations, you may opt out at a later date. If you wish to opt out, please contact Wim Rooijakkers at wrooiakkers@chromalloy.com. If you wish to opt in, please sign and return this notice to GDPROptin@chromalloy.com in accordance with Paragraph 9 below.

3. HOW WE STORE PERSONAL DATA AND WHO CAN ACCESS IT

The Company maintains internal records of customers to facilitate completion of our contractual obligations. Finance departments will have records to support financial transactions. Customer Services departments will have records to support processing of requests for information, quotes, orders and contracts.

4. DISCLOSURE AND INTERNATIONAL TRANSFERS OF PERSONAL DATA

The Company may disclose in accordance with applicable law relevant Personal Data to certain third parties in connection with the provision of the following services to the Company:

- business, administrative, and management functions – for example the Company may partner with third parties to optimize its services and analyse information;

Where the Company engages a third-party processor to process Personal Data on its behalf, such as that listed above, the Company will delegate such processing in writing, and will obligate the processor to act on the Company's behalf and under the Company's instructions. In addition, the Company will impose in writing appropriate data protection and information security requirements on such third-party processors.

These Data Processors may include offices located in other countries where data protection laws do not provide an equivalent level of protection to the laws in the Customers' home jurisdiction. Such Personal Data will be transferred for the purposes set out in paragraph 2 above and in a way that provides adequate protection of your Personal Data.

Given the global nature of the Company, the Company will also (subject to applicable law) transfer Personal Data to Chromalloy Group Entities overseas ("**Data Importers**"). Such Personal Data will be transferred for the purposes set out in paragraph 2 above and in a way that provides adequate protection of your Personal Data.

The Company has put in place appropriate safeguards (such as processing agreements and contractual commitments) in accordance with applicable legal requirements to ensure that Customer's Personal Data is adequately protected.

From time to time, the Company may also need to disclose Personal Data to other parties, such as any person (natural or legal) or organisation to whom a Chromalloy Group Entity may be required by applicable laws to disclose Personal Data, including, but not limited to, law enforcement authorities, financial institutions, and central and local government. The Company may share Personal Data with these third parties where it believes this is necessary to comply with a legal or regulatory obligation, or otherwise to protect its rights or the rights of any third party.

5. **DATA RETENTION**

The Company will retain Personal Data in accordance with applicable legal requirements, and only for as long as necessary for the purposes described in section 2 or as long as required by law or to defend potential legal claims.

6. **CUSTOMERS RIGHTS**

Customers are entitled to access Personal Data held about them by contacting Wim Rooijackers at wrooijackers@chromalloy.com. Customers have the right to have inaccurate data corrected or removed and also have the right to object to the processing of their Personal Data. Subject to applicable law, Customers have the right to: (i) restrict the Company's use of their Personal Data; (ii) receive their Personal Data in a usable electronic format and transmit it to a third party (right to data portability); and (iii) lodge a complaint with their local data protection authority.

7. **QUESTIONS**

For any questions regarding this Notice, Customers should contact: Wim Rooijackers at wrooijackers@chromalloy.com.

8. **NOTICE UPDATES**

In case of any material changes to the way in which the Company collects or uses Personal Data, the type of Personal Data it collects or any other aspect of this Notice, the Company will notify Customers as soon as possible by reissuing a revised Notice.

9. **ACKNOWLEDGEMENT**

Please sign below to indicate your acknowledgement that you have read and understood this Notice and how your Personal Data will be handled and to indicate your agreement to receive from

the Company both updated capability information and invitations to internal and external professional events.

Signature

Date

Please return your signed consent to GDPROptin@chromalloy.com