

Privacy Notice (US)

This Privacy Notice applies to Setra Systems, LLC and its corporate subsidiaries and affiliated companies (collectively, "Setra", "we," "us," "our") collection and use of United States residents' personal information, particularly where such use or collection is governed by the California Consumer Privacy Act (CCPA) and relates to consumer transactions. Although the CCPA applies to personal information of individuals that are residents of California, Setra may as a courtesy extend some of the CCPA's requirements to personal information of residents of the United States of America more broadly.

If you're in the European Economic Area and your personal data is governed by the General Data Protection Regulation (EU) 2016/679 and the respective implementing acts of European Economic Area Member States, please see our Privacy Notice (GDPR) for more information on how we handle your personal data.

Please read this Notice carefully because it provides important information and explains your rights. If you have any questions or concerns, or wish to exercise your privacy rights, we invite you to contact us by any of the methods listed at the bottom of this Notice. This Privacy Notice does not apply to personal information collected or used exclusively in the business-to-business context, and it does not cover Setra's collection or use of personal information in the Human Resources context.

Last Updated: December 20, 2024

Who are we?

We are Setra Systems, LLC of 159 Swanson Road, Boxborough, Massachusetts, 01719, USA, privacy@setra.com, +1 (800) 257-3872, and its corporate subsidiaries and affiliated companies. We provide premium sensing products and services to customers under our Setra, Gems Sensors & Controls, Dolan-Jenner Industries, West, CAL, Partlow, and PMA brands.

This Privacy Notice explains how we use the personal information we maintain about consumers, and their rights under applicable state data privacy laws in relation to that personal information. We may use your information jointly with our affiliated operating companies worldwide and Fortive Corporation, our parent company, located at 6920 Seaway Boulevard, Everett, Washington, 98203, USA.

What does this Privacy Notice cover?

This Notice:

- sets out the types of personal information that we collect about consumers;
- explains the categories of sources of personal information we collect;
- explains how and why we collect and use personal information;
- explains the categories of other entities to which we disclose personal information and the categories of such information;
- explains the different rights and choices available regarding personal information; and
- explains how consumers can contact us to exercise their rights.

Notice at Collection - What categories of personal information do we collect?

Personal information means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer. It does not include deidentified or aggregate information, or information that is publicly available, such as in governmental records, or that a consumer has made available to the general public.

We collect the following categories of personal information:

- **Personal identifiers:** name, business postal address, title, email address, phone numbers, IP address, driver's license number or passport information, account name and password
- **Financial information:** payment information used to purchase our products or services
- **Internet or other electronic activity information:** information we obtain through your interaction with our website or advertisements, browser, and device information, courses you take through our website
- **Commercial information:** records of products or services purchased or considered, including trainings or other educational offerings
- **Professional information:** your job title and name of your employer, professional certifications received
- **Educational information:** continuing education courses taken, information collected in connection with certifications obtained or sought
- **Audio information:** recordings of calls to our customer support numbers
- **Inferences drawn from the above categories of personal information**
- **Sensitive personal information:** driver's license number or passport information

We collected the same categories of personal information in the 12 months prior to the date of this Notice.

Notice at Collection - What are the purposes for our collection of personal information?

We collect personal information to perform services and provide products to you, for our business purposes, and to comply with applicable laws.

Notice at Collection - What criteria do we use to determine how long we retain personal information?

We retain personal information for as long as is reasonably necessary for the purposes set out in this Privacy Notice and to comply with our legal obligations under applicable local, state, and federal laws.

Notice at Collection - Do we sell personal information or share personal information for purposes of cross-context behavioral advertising?

When we engage in digital advertising, we sell the following categories of Personal Information (according to the broad definition of the word "sell" under certain state laws) and share them for purposes of cross-context behavioral advertising: personal identifiers (IP address) and internet or other electronic activity information.

These categories of Personal Information are sold to or shared for cross-context behavioral advertising with advertising networks and other companies that facilitate digital advertising. We engage in such sales and sharing to facilitate digital advertising that is able to reach people that are most likely to be interested in our products or services. We do so by allowing third parties to place cookies or other trackers on our websites that may collect information about your online activities over time and across different websites or applications.

We also sell the following categories of Personal Information to our parent company Fortive and our affiliates so they can offer products to you that you might be interested in receiving: name, business you represent, email address, physical address, commercial information such as purchasing history information.

Do we collect or process sensitive personal information for the purpose of inferring characteristics about consumers?

We do not collect or process sensitive personal information to infer characteristics about consumers, nor do we use such information other than to provide our products and services.

What are the categories of sources from which we collect personal information?

We collect personal information from you directly, from your business or employer, from third parties with which you interact on our website.

Disclosure of personal information for business purposes

This chart describes the categories of personal information that we disclosed to third parties for a business purpose in the 12 months prior to the date of this Notice.

<u>Category of Personal Information</u>	<u>Categories of Third Parties to Which We Disclosed Personal Information for a Business Purpose</u>
Personal identifiers: name, postal address, email address, phone numbers, IP address, driver's license number or passport information, account name and password	Service providers that process payments, manage our customer information, provide customer service, facilitate IT services, provide security services and cloud-based data storage, assist with other IT-related function, host our website, assist with advertising and marketing, provide analytics services, provide legal and accounting services
Financial information: payment information used to make a purchase with us	Service providers that assist with payment processing
Internet or other electronic activity information: information we obtain through your interaction with our website or advertisements, browser, and device information	Service providers that assist with security services and cloud-based data storage, host our websites, assist with other IT-related functions
Commercial information: records of products or services purchased or considered, including trainings or other educational offerings	Service providers that process payments, manage our customer information, provide customer service, assist with advertising and marketing, provide analytics services, provide legal and accounting services
Professional information: your job title and name of your employer, professional certifications received	Service providers that manage our customer information, provide customer service, provide analytics, assist with advertising and marketing
Education information: continuing education courses taken, information collected in connection with certifications obtained or sought	Service providers that manage our customer information, provide customer service, assist with advertising and marketing, deliver educational content, assist with providing educational credits or certifications

Audio information: recordings of calls to our customer support numbers	Service providers that assist in providing customer service
Inferences drawn from the above categories of Personal Information	Service providers that assist with advertising and marketing, provide analytics

Business Purposes for the disclosure of personal information

We disclosed the aforementioned categories of personal information for the following purposes: to sell or provide information about our products and services, to process payments, manage our customer information, provide customer service, operate our computer systems, secure our systems, store information, protect against security threats, operate our website, undertake advertising and marketing, obtain analytics services, or for legal and accounting purposes.

Additional information about how we disclose personal information

We also disclose personal information to third parties to comply with legal obligations; when we believe in good faith that an applicable law requires it; at the request of governmental authorities or other third parties conducting an investigation; to detect and protect against fraud, or any technical or security vulnerabilities; to respond to an emergency; or otherwise to protect the rights, property, safety, or security of third parties, visitors to our websites, our businesses, or the public.

Cookies, trackers, and analytics

We use cookies, pixel tags, web beacons and other similar tracking technologies (“tracking technologies”) to automatically collect information through our website. Tracking technologies are small data files placed on your computer, tablet, mobile phone, or other devices that allow us to record certain pieces of information whenever you visit or interact with our websites and services. We may use these tracking technologies to help identify irregular behavior, prevent fraudulent activity, and improve security, as well as making it possible for you to save your preferences and help us understand how you interact with our website. For information about our use of cookies and how to decline them or turn them off please read our [Cookie List](#).

You may set your browser to notify you when you receive a cookie. Many web browsers also allow you to block cookies. You can disable cookies from your computer system by following the instructions on your browser or at www.youradchoices.com.

We also allow third parties to use tracking technologies on our website for analytics and advertising. They assist in helping display advertisements, tailor advertisements to your interests and to assist in determining if you require assistance or are having problems navigating on our website. Some of these third parties use the tracking technologies to collect information about how you interact with other websites and advertisements across the Internet in order to provide advertising that is tailored to your interests, and which may appear on our website or on other websites or platforms.

We use Google Analytics to evaluate the use of our website. Google Analytics uses cookies and other identifiers to collect information, such as how often users visit a website, what pages they visit when they do so, and what other websites they visited prior to visiting our website. For information about Google’s privacy practices, please refer to the Google Privacy Policy: <https://policies.google.com/privacy?hl=en-US#infocollect>.

Personal information of minors

We do not employ minors under the age of 16 and we do not knowingly collect or sell the personal information of minors, including minors under 16 years of age.

Third party websites and social media buttons

Our website may contain links to third-party websites, including social media buttons that link to social media platforms. This Notice does not govern how those third parties or social media platforms collect or use personal information and we do not endorse or have control over their practices. The privacy policies and terms of use for those third parties' websites or the social media platforms govern those companies' privacy practices. We are not responsible for the content or privacy practices of any third-party websites or platforms.

Do Not Track signals

Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals.

How do we keep personal information secure?

We maintain reasonable security measures appropriate to the nature of the personal information that we collect, use, retain, transfer or otherwise process. Those measures include administrative, technical, and physical safeguards designed to protect the personal information you provide against accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure, or use. However, data security incidents and breaches can occur due to a variety of factors that cannot reasonably be prevented; therefore, our safeguards may not always be adequate to prevent all breaches of security.

Changes to this Notice

We may review and update this Notice from time to time. If changes are made, we will update this Notice and reflect the date of such modification in the date above. If the changes are material, you will be notified via email or a notice on our website.

How can you contact us?

If you have questions on the processing of your personal information or are unhappy with how we have handled your information, please contact us here: Setra Systems, LLC, 159 Swanson Road, Boxborough, Massachusetts, 01719, USA, privacy@setra.com, +1 (800) 257-3872.

If you would like to make a request to access, delete, or correct your personal information, you may call us toll free from within the United States at +1 (844) 981-1525 or submit a request online through the [Privacy Web Form](#).

CALIFORNIA PRIVACY RIGHTS

If you are a California resident, you may have rights to your personal information, as described below.

Rights to access, delete, correct personal information

California residents can submit a request to us for the following information, with respect to your personal information:

- The specific pieces of personal information we have collected about you
- The categories of personal information we have collected about you
- The categories of sources from which we collected the personal information
- The categories of personal information that we sold or disclosed for a business purpose
- The categories of third parties to whom personal information was sold or disclosed for a business purpose
- The business or commercial purpose for collecting or selling your personal information

Our responses to any of these requests will be to provide you with the personal information we have collected and maintained about you on or after January 1, 2022, subject to any legal exceptions or conflicts with applicable laws, regulations, or rights held by others.

YOUR RIGHT TO REQUEST THE DELETION OF PERSONAL INFORMATION WE HAVE COLLECTED FROM YOU

Upon your request, we will delete the personal information we have collected from you in your capacity as a consumer if such information is not subject to applicable exceptions under existing laws.

YOUR RIGHT TO CORRECT INACCURATE PERSONAL INFORMATION

Upon your request, we will use commercially reasonable efforts to correct inaccurate personal information we have collected about you in your capacity as a consumer. When you request that we correct inaccurate personal information, we will ask you to provide documentation supporting the accuracy of the personal information that is the subject of your request, and in doing so, we will evaluate the totality of the data relating to the contested personal information. Whether or not we are able to honor your correction request, we will notify you that your request was processed or denied and why.

EXERCISING YOUR RIGHTS

You can submit access, deletion, or correction requests by calling us toll free from within the United States at +1 (844) 981-1525 or submitting a request online at [Privacy Web Form](#).

Your right to ask us not to sell or share your personal information

With respect to those categories of personal information that we sell to third parties or share with third parties for the purposes of cross-context behavioral advertising (see above), you have the right to opt out of such sales and sharing. You may submit such requests in relation to our use of tracking technologies in our Cookie Consent Management Centre by clicking the “Do Not Sell or Share My Personal Information.”

Opt-out Preference Signals

An opt-out preference signal is sent by a platform, technology, or mechanism on behalf of consumers and communicates a consumer’s choice to opt out of the sale and sharing of personal information for cross-context behavioral advertising with all businesses that recognize the signal, without having to make individualized requests. The signal can be set on certain browsers or through opt-out plug-in tools.

We recognize the Global Privacy Control signal and do so at the device and browser level. The opt out therefore does not apply to Personal Information we may collect offline or that we may associate only with your name or email address. This means that if the signal is sent through a specific browser on a specific device, we will recognize it for that browser as used on that device only, and only with respect to the identifiers for that browser. If you would like more information about opt-out preference signals, including how to use them, the Global Privacy Control website has additional information (<https://globalprivacycontrol.org/>).

How will we respond to requests to exercise your rights to access, delete, correct, or opt out of the sale or sharing of personal information?

For requests for access, deletion, or correction, we will first acknowledge receipt of your request within 10 business days of receipt of your request. We will then provide a substantive response to your request as soon as we can, generally within 45 days from when we receive your request, although we may be allowed to take longer to process your request in certain jurisdictions or under certain circumstances. If we expect your request is going to take us longer than normal to fulfil, we will let you know.

For requests to opt out of the sale or sharing of personal information, we will comply no later than 15 business days after receipt of your request.

We usually act on requests and provide information free of charge, but we may charge a reasonable fee to cover our administrative costs of providing the information in certain situations.

In some cases, the law may allow us to refuse to act on certain requests. When this is the case, we will endeavour to provide you with an explanation as to why.

How will we verify your identity when you submit a request to access, delete or correct personal information?

We will ask you to provide identifying information to verify your identity.

If we are unable to verify your identity with the degree of certainty required, we will not be able to respond to the request. We will notify you to explain the basis of the denial. Additionally, we will treat the request as one seeking disclosure of the categories of personal information we have collected about you and endeavour to verify your identity using the less-stringent standards applicable to such requests.

How do we process requests made on your behalf by an agent?

You may designate an agent to submit requests on your behalf.

If you would like to designate an agent to act on your behalf with respect to requests for access, deletion, or correction, you will need to directly confirm with us that you provided the agent with permission to submit requests for you. Additionally, the agent will be required to provide us with written proof that you gave the agent signed permission to submit a request on your behalf.

Information to identify and verify your agent can be submitted through the same mechanism and at the same time that you submit information to verify your identity.

If you would like to designate an agent to act on your behalf with respect to requests to opt out of the sale or sharing (for cross context behavioral advertising) of personal information, the agent will need to provide us with your signed permission indicating the agent has been authorized to submit the opt-out request on your behalf.

Our commitment to honoring your rights

If you exercise any of the rights explained in this Notice, we will continue to treat you fairly and not discriminate against you because you exercised any such rights.