

NOTICE OF DATA PRIVACY POLICY FOR EMPLOYEES

Introduction

Luvata Oy and its direct and indirect subsidiaries (collectively, "Luvata"), is required to collect and maintain information about its employees in order to comply with a myriad of governmental and contractual obligations, including providing for the payment of taxes, employee benefits, wages, etc. However, Luvata also recognizes the importance of protecting your privacy, and therefore adheres to the Safe Harbour Principles (the "Principles") including Notice, Choice, Onward Transfer, Security, Data Integrity, Access and Enforcement. The United State Department of Commerce and the European Commission have agreed on a set of data protection principles and frequently asked questions (FAQ) to enable U.S. companies to satisfy European Union (EU) law requirements for adequate protection of personal information transferred from the EEA to the United States. More information is available at <http://export.gov/safeharbor/>. This Notice of Data Privacy Policy for Employees (this "Policy") describes the information collected by Luvata from its employees and how Luvata uses that information.

Collection of Information

In connection with your employment, Luvata may ask you to provide certain information, including, but not limited to, your name, mailing address, telephone numbers, gender, birth date, citizenship, nationality, marital status, name of dependents, birth date of dependents, occupation of dependents and national identification number. Additionally we may maintain information relating to your employment with Luvata including, without limitation, your employee identification number, business unit/division of employment, department, physical work location, job code, compensation rate, supervisor, work shift, hire and termination date, appraisal dates and ratings, training, skills, educational background, language proficiency, certifications and licenses (collectively, "Employee Information").

Use of Information

The information collected by Luvata will be used for various administrative and record keeping purposes by Luvata and for the purpose to automate the Luvata Talent Management Process (recruiting, performance management, succession planning, career development etc).

Disclosure of Employee Information

Employee Information will be disclosed to a limited number of Luvata employees whose job necessitates that they maintain, compile, or otherwise have access to Employee Information. Luvata may also disclose Employee Information to a third party when it believes, in good faith, that such disclosure is reasonably necessary to comply with any law or to protect the rights, property, or safety of another person. Additionally, Luvata may disclose Employee Information to a third party employee benefit provider or payroll service. If Luvata does disclose information to third party, Luvata will ensure that the third party either subscribes to the Principles or is subject to the EU Directive on Data Protection (“Directive”) or Luvata will enter into a written agreement with such third party which requires the third party to provide at least the same level of privacy protection as is required by the relevant Principles. Lastly, Luvata may transfer or otherwise disclose Employee Information in connection with the sale of its business to a third party.

Transfer of Employee Information

Employee Information will be transferred, transmitted, and accessed electronically by a limited number of Luvata employees (as discussed above) at various Luvata locations around the world. Luvata has taken, and will continue to take, appropriate technical and organizational measures to protect all Employee Information from destruction, loss, alteration, or unauthorized disclosure or access.

Employee Consent

Unless you withdraw your consent, in writing, you agree to and accept the proposed use, disclosure, and transmission of your Employee Information by Luvata as set forth in this Policy. Upon any modification of this Policy, Luvata will prominently post a revised Policy within five (5) business days of its adoption and provide each employee with an opportunity to withdraw his or her consent to any new use or disclosure of his or her Employee Information. If any employee objects to Luvata’s collection, use, disclosure, or transmission of certain Employee Information, Luvata will make reasonable efforts to address the concerns of the employee. In no case will an employee be subject to sanction or retaliation for objecting to the collection, use, disclosure or transmission of Employee Information. Any employee who withholds Employee Information or prohibits its collection, use, disclosure, or transmission, however, may be disadvantaged as a result of not making the information available. For example, unwillingness to provide information required to use a service or receive a benefit may make an employee ineligible for that service or benefit.

Your Rights Regarding Your Employee Information

Although your Employee Information is the physical property of Luvata, the information contained in the record belongs to you. Each employee has the right to:

- Obtain a copy of Luvata's Policy upon request.
- Inspect his or her Employee Information and be able to correct, amend, or delete information where it is inaccurate, except where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy in the case in question, or where the rights of persons other than the individual would be violated. All requests to inspect, correct, amend, or delete information must be submitted in writing to the local Human Resources Manager.
- Withdraw his or her consent to the continued or future use and disclosure of his or her Employee Information, except as to that Employee Information that Luvata determines to be necessary for continued employment.

Luvata's Responsibilities Regarding Protecting Employee Information

Luvata is required to:

- Provide employees with notice of Luvata's Policy regarding the collection, maintenance, use, and disclosure of Employee Information.
- Ensure that Luvata's published Policy is current, accurate, comprehensive, prominently displayed, completely implemented, accessible, and conforms to established data privacy principles.
- Abide by the terms of this Policy. In the event that Luvata modifies the terms of this Policy, Luvata will prominently post a revised Policy which describes all intended uses and disclosures of Employee Information, within five (5) business days of its adoption, and provide each employee with an opportunity to withdraw his or her consent to any new use or disclosure of his or her Employee Information.
- Notify the employee if Luvata is unable to agree to the employee's requested restriction on the use or disclosure of his or her Employee Information.
- Take reasonable efforts to validate the accuracy of and to update Employee Information.
- Maintain the privacy of your Employee Information by taking reasonable precautions to protect the data from loss, misuse, unauthorized access, disclosure, alteration and destruction.
- Comply with all laws regarding the privacy of Employee Information.

Training and Verification of Privacy Practices

Luvata has provided its employees handling Employee Information with appropriate training to ensure that they are fully aware of their responsibility with respect to data protection. Luvata utilizes internal self-assessment procedures for periodically conducting objective reviews of compliance with the principles of privacy described in this policy.

Limitation on Application of Principles

Adherence by Luvata to the Principles may be limited:

- a. to the extent required to respond to a legal or ethical obligation; and
- b. to the extent expressly permitted by an applicable law, rule or regulation.

Complaints

If you believe Luvata has breached its Policy by permitting an unauthorized use, disclosure, or transmission of your Employee Information, you may contact or file a complaint with your supervisor. If you are not satisfied with the response or action taken by your supervisor, all such complaints and concerns may then be directed to the local Human Resources Manager. Additionally, Luvata employees located in the European Union may also contact their national EU Data Protection authorities. You will not be penalized for filing a complaint.