

MANTRAC GROUP DATA GOVERNANCE STATEMENT (INCORPORATING DELTA GROUP)

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This Data Governance Statement describes the practices of Mantrac Group Companies (UHL, subsidiaries and associated companies within Egypt under beneficial control) for collecting information from customers and suppliers relating to machines, products or other assets and their associated worksites (collectively “**Assets**”), and customers or potential customers either directly or via suppliers. We collect this information through online and offline means including: (1) applications and platforms for use on or through computers, APIs, and mobile devices, such as VisionLink® and Product Link™ Web (“**Applications**”); (2) telematics or other devices on Assets, (“**Devices**” and, together with the Applications, “**Digital Offerings**”); and (3) suppliers, service providers, and customers.

WHAT INFORMATION WE MAY COLLECT

“**System Data**” is information that is ingested or used by or generated through Digital Offerings, which may include:

- **Device, Asset and Component Information**, including model number, serial number, order number, software and hardware version numbers, performance, and configuration, including work tools or other peripheral devices attached to Assets.
- **Electronic Data**, including sensor logs, trends, histograms, event data, other alerts, digital state data, fault codes, idle time, daily and cumulative fuel consumption, emissions data, service meter hours, electronic data files downloaded manually or automatically from an Asset, troubleshooting data, and other data, depending on the customer and Asset and communication channel used by a Device.
- **Inspection Data**, including results of inspections using a Caterpillar or third-party inspection system.
- **Device Location Information**, including the physical location of an Asset (e.g., determined using satellite, GPS, cell phone tower, Bluetooth or WiFi signals).
- **Fluid Data**, including analysis results of fluid samples (such as oil, hydraulic and coolant fluids) obtained using Caterpillar or third-party tools.
- **Event Recorder Data**, including location, speed, direction and associated video recordings, use of controls and positive train control information.
- **Service and Maintenance History**, including work orders (records of all maintenance, repair, parts purchases, replacement and modification to an Asset), component life (history of usage and wear life of a component), maintenance schedule, planned maintenance, warranty coverage data, maintenance and repair contracts, service intervals (scheduled interval for planned maintenance of component replacement activities for an Asset), component lists (lists of parts that make up an Asset) and service letters (describing special service actions recommended by Caterpillar to correct a known problem with an Asset).
- **Site and Environmental Conditions**, including the type of work being done, condition of roads or tracks, altitude, climate and material tracking.
- **Patterns of Use**, including any user-defined information relating to a product you provide to us through a Digital Offering.

“**Personal Information**” is information that relates to an identified or identifiable individual, which includes:

- Name
- Postal address (including billing and shipping addresses)
- Telephone number
- Email address
- Identification information such as usernames and user IDs
- The employer or company with which an individual is associated and his or her role and title

- User Profile information
- Location information. We will not collect precise GPS information from your mobile device unless you have provided your consent to our collection of it.
- Information about any computer or mobile device with which you access Applications
- Information about your use of Applications
- Audiovisual data
- Physiological data such as eye movement, facial expressions, heart rate. This is considered particularly sensitive personal data, so will only be collected if you have provided your explicit consent.

Some of this information will be necessary for us to provide services to you under a contract. We will inform you in advance where this is the case.

“Operations Data” is information we may hold in our systems generated by normal business activities or collected from customers:

- Information contained in invoices, contract documents and service contracts.
- Customer’s name, address, industry, customer category, the name, position, email address, and telephone number of designated contact persons and other relevant information.
- Work order data, including information about the customer, Asset involved, problem identified, and repairs performed.

Information collected may simultaneously constitute System Data, Personal Information, and Operations Data, or any combination thereof. Data sourced from customers and suppliers relating to machines, products or other assets and their associated worksites (collectively **“Assets”**), and customers either directly or via suppliers will be stored on the basis of Legitimate Business Interest to help serve their business needs. Data sourced from potential customers, either directly or via suppliers will be stored with appropriately determined authority. All data will be collected subject to the rights covered in the section of this document under Choices and Access.

HOW WE MAY COLLECT INFORMATION

We, our suppliers and our service providers may collect information in a variety of ways, including:

- **Through Devices:** We may receive information via cellular or satellite link, or radio or Ethernet connection from Assets equipped with a Device, which may include System Data (such as information relating to the Device or Asset) or Personal Information (such as from information generated by fatigue monitoring devices, on-board camera and proximity detection systems, and in-cab monitoring technology). Some information may be collected automatically, such as fault codes, hours of operation and fuel levels.
- **Through Applications and Online:** We may collect information through Applications (e.g., when you enter maintenance information) or when you use our websites, online services or platforms. We may also receive information through other online means, such as when you initiate a data transmission through on-site servers or email inspection information to us. We may also collect information typically collected through websites and mobile applications, such as browser and device information, application usage data, information collected through cookies, pixel tags and other technologies, IP addresses and location information.

- **Offline:** We may collect information when you interact with us, attend one of our trade shows, place an order or contact customer service.
- **From Component Manufacturers and OEMs:** We may obtain System Data from manufacturers of the components in your Assets or of non-Caterpillar Assets you use. This information may be provided to us automatically.
- **Through Wearable Technology:** We may collect information through wearable technology, such as fatigue monitoring devices or RFID tags embedded in hardhats or safety vests.
- **From Asset Owners, Distribution Networks and Others:** We may receive additional information from Asset owners, operators and other persons who have management responsibility for an Asset.
- **From Other Sources:** We may receive your information from other sources, such as public databases, joint marketing partners, social media platforms (including from people with whom you are friends or are otherwise connected) and from other third parties. We may collect or generate information from troubleshooting data, from your service providers (such as fluid analysts and site inspectors) or from maintenance, inspection or warranty records.

HOW WE MAY USE INFORMATION AND THE BASIS ON WHICH WE USE IT

We, use the information we have collected, permit our suppliers to use it for the following purposes:

To Provide Services to You and Others:

- To allow you us or our suppliers to monitor the status of Assets, to provide you use of Applications, to complete and fulfill purchases, and to communicate with you regarding your purchase or rental and provide you with related customer service.
- To fulfill customer support agreements, perform maintenance and repairs and deliver rental Assets or parts.
- To make recommendations regarding safety, Asset health, maintenance, worksite efficiency and productivity training for operators.
- To enhance the safety of machine operations, including by tracking proximity to Assets, other objects or humans.
- To enable remote technician services, such as remote troubleshooting, and remote tuning.
- To provide you with location-based services and content if you have provided your consent to our use of precise location information.

To Enable Communications:

- To manage the connection to the Asset or Device.
- To allow you and other users of Applications to communicate with each other through Applications.
- To send administrative or contractual information, for example, information regarding the terms and conditions of using Digital Offerings, warranty policies or service contracts.
- To provide you with information about new products and services and to send you marketing communications that we believe may be of interest to you.

For General Business Purposes:

- To conduct market research.
- To perform data analytics, audits, improving products, developing new products, enhancing, improving or modifying our Digital Offerings, identifying usage trends and operating and expanding our business activities and for statistical analysis based on aggregated and de-identified data, such as benchmarking reports.
- To provide services to customers, manage work flow, monitor repairs, project future maintenance and service, and troubleshoot issues.
- To validate effectiveness of recommendations, resolve complaints, and fulfill orders.
- To manage inventory in order to provide you with parts and services.
- To manage a fleet of owned or rented Assets.
- To maximize the efficiency of operations and increase sales.
- To develop digital applications.

Other Uses:

- To allow you to participate in sweepstakes, contests or similar promotions and to administer these activities. Some of these activities have additional rules, which could contain additional information about how we use and disclose your Personal Information. We suggest that you read any such rules carefully.
- For additional uses which you have specifically consented to.

With respect to audiovisual data that identifies an individual or physiological data for an identifiable individual, we will use that data only to provide products and services to our customers, including to make recommendations regarding safety, Asset health, maintenance, worksite efficiency and productivity training for operators, and to improve our products and services, and only with your consent to use this information for these purposes.

We are required to have a legal basis for our processing of Personal Information. Where set out above, we may rely on your consent as our legal basis. In other cases, we rely on:

- The fact that the use of Personal Information is necessary for us to fulfil a contractual obligation with you. This might be to provide services you, as an individual, request, or which we are contractually required to provide, including providing sweepstakes or other competitions;
- The fact that it is necessary for us to comply with legal obligations to which we are subject. This may include financial reporting obligations.
- The fact that processing Personal Information is necessary for us to meet our legitimate business interests, including our interests in providing our services to your employer or another company, to carry out research, to run our business efficiently, to market and advertise our products, to send other communications with you, and to keep our records accurate and up to date. We take steps to ensure that we do not use your Personal Information in any ways you would not expect, and you can object to our use of Personal Information for these purposes by contacting us using the details set out below.

HOW WE MAY DISCLOSE INFORMATION

We may disclose information:

- To Suppliers to permit them to use System Data and Personal Information for product development purposes.
- To Asset owners, to permit them to manage their use of their Asset.
- To our service providers who provide services such as data analytics, information technology and related infrastructure provision, application development, platform hosting, customer service, product development, auditing, advisory and other services.
- To component manufacturers, to permit them to study the use of their products, to improve their products and to develop new products.
- To agents, service providers or other third parties contracted by or engaged in business with Asset owners, who have management responsibility for the Asset.
- To a court, regulator or other governmental authority in order to comply with any legal obligations to which we are subject.
- To a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our or any of our affiliate's business, Assets or stock (including in connection with any bankruptcy or similar proceedings).
- To additional recipients as agreed by you and us.

These recipients will only use personal data for the purposes described above, or on our strict instructions and on our behalf.

Personal Information will be shared under relevant non-disclosure agreements set up with data processors.

De-identified or Aggregated Information: De-identified or Aggregated Personal Information, Operations Data or System Data does not personally identify you or any other user of Digital Offerings, and it is not possible using any means reasonable available to us to re-identify you or any other user. For example, we may aggregate Personal Information to calculate the percentage of our users who have a particular telephone area code, or we may aggregate System Data to calculate component wear rates. We may use and disclose de-identified or aggregated information for any purpose, except where we are required to do otherwise under applicable law.

SECURITY AND RETENTION

We use reasonable organizational, technical and administrative measures designed to protect information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please immediately notify us in accordance with the "Contacting Us" section below. Our Data Security Policy can provide further information in this regard.

CHOICES AND ACCESS

Your choices regarding our use and disclosure of your Personal Information

We give you choices regarding our use and disclosure of your Personal Information. You may opt-out from:

- **Receiving electronic marketing communications from us:** If you no longer want to receive marketing emails relating to Digital Offerings from us on a going-forward basis, you may opt-out by contacting us via datagovernance@mantracgroup.com. We will process your request(s) as soon as reasonably practicable.

How you can access, change or suppress your Personal Information

If you would like to review, correct, update, suppress or delete Personal Information, or exercise other rights over your Personal Information, you may contact us via datagovernance@mantracgroup.com.

In your request, please make clear what Personal Information you would like to have changed, whether you would like to have your Personal Information suppressed in our database. For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will process your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes or in accordance with agreements we may have with a third party (e.g., an Asset owner).

Subject to local law, in certain circumstances you have the right to object to our uses of your Personal Information, to restrict our uses of your Personal Information, have certain Personal Information deleted, and have certain Personal Information transmitted to you or another company in an electronic format (the right of 'data portability').

OTHER IMPORTANT INFORMATION

Third Party Content: This Data Governance Statement does not address, and we are not responsible for (i) the privacy, information or other practices of any third party operating any website or online service to which a Digital Offerings links (e.g., our Applications may include, for your convenience, a hyperlink to local weather information provided by a third party with whom we have no business relationship) and (ii) Personal Information controlled by a third party, such as a supplier, service provider, or customer, even if such Personal Information is collected or otherwise processed by us. Further, the inclusion of a link in a Digital Offering does not imply endorsement of the linked site or service by us or by our affiliates.

Retention Period: We keep Personal Information about you for as long as you have a relationship with us, for example as long as the company you work for has a contract with us, or for as long as you use devices which we manufacture and provide. We will also keep Personal Information about you for a period after your relationship with us has ended. When determining how long this period will last, we take into account our legal obligations, the expectations of regulators and how long Personal Information is actually useful for the purposes described above. We also consider how long we need Personal Information for internal audit purposes, and how long we may need it to exercise or defend our legal rights.

Cross Border Transfers: Your information may be stored and processed in any country where we operate or where our service providers operate, and by using a Digital Offering you expressly consent to the transfer of information to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country. Cross Boarder Transfers will be covered by relevant non-disclosure agreements between us and the recipient or under Model Clauses in compliance with relevant laws.

Sensitive Information: Our Digital Offerings are not designed for you to send us sensitive Personal Information such as social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, or genetic characteristics, criminal background or trade union membership. We request that you refrain from sending such information on or through Digital Offerings or otherwise to us.

UPDATES TO THIS DATA GOVERNANCE STATEMENT

We may change this Data Governance Statement. The “LAST UPDATED” legend at the top of this page indicates when this Data Governance Statement was last revised. Any changes will become effective when we post the revised Data Governance Statement. Your use of Digital Offerings following these changes means that you accept the revised Data Governance Statement.

CONTACTING US

If you have any questions about this Data Governance Statement, please contact us via datagovernance@mantracgroup.com.

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right to make a complaint to the data protection authority in the country in which you live.