

## Adient Privacy Notice

Adient plc (registered in Ireland, 25-28 North Wall Quay, IFSC, Dublin, 1), and its subsidiaries and affiliated companies (collectively **Adient**, we, us or our) care about your privacy and are committed to processing your personal information in accordance with fair information practices and applicable data privacy laws.

As a sign of our commitment to privacy, we have adopted a set of Binding Corporate Rules (“BCRs”). These contain our global privacy commitments, including our policy on transfers of personal information and associated individual privacy rights, with the aim of ensuring that your personal information is protected while processed by our affiliates. These BCRs have been approved by the European Data Protection Authorities.

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### Scope of this Privacy Notice

This Privacy Notice explains how we handle individuals’ personal information in the different locations where we operate. Personal information is all information relating to an identified or identifiable individual.

## **How and where we collect personal information**

We collect personal information in a variety of ways through our normal business activities, in both online and offline contexts. This includes, for example, when you place orders or purchase products or services, enter into agreements or communicate with us, or visit and use our websites. We also receive personal information from our customers and suppliers in order to enter into business relationships and to perform services. We may also receive personal information from third parties, including public databases, social media platforms, or third party partners such as analytics or marketing providers.

## **What personal information we may collect**

Personal information that we collect from individuals may include:

- Contact Information that allows us to communicate with you, such as your name, job title, age and prefix, username, mailing address, telephone numbers, email address or other addresses that allow us to send you messages, company information and registration information you provide on our website.
- Relationship Information that helps us do business with you, such as the types of products and services that may interest you, contact and product preferences, languages, creditworthiness, marketing preferences and demographic data.
- Transaction Information about how you interact with us, including purchases, inquiries, customer account information, order and contract information, delivery details, billing and financial data, details for taxes, transaction and correspondence history, and information about how you use and interact with our websites.
- Security and Compliance Information that helps us to secure our interests, including information for conflict checks, fraud prevention and internal verification, as well as information necessary for the security of our premises, such as visual recordings.

## **Purposes for which we use personal information**

We use personal information in the context of our normal business activities, which includes the following purposes:

- Fulfilling your orders for products or services and related activities, such as product and service delivery, customer service, account and billing management, support and training and to provide other services related to your purchase.
- Managing our contractual obligations and your ongoing relationship with us, including interacting with you, informing you about our products or services, as well as special offers and promotions.
- Ensuring the security of our websites, networks and systems, and premises, as well as protecting us against fraud.

- Managing our everyday business needs, such as payment processing and financial account management, product development, contract management, website administration, fulfillment, corporate governance, audit, reporting and legal compliance.

### **Legal basis for our processing of personal information**

These processing operations are based on one of the following legal bases, as applicable:

- the need to process your personal information for contract performance or to take steps to enter into a contract with you,
- Adient's legal obligations,
- Adient's legitimate business interests, including operating our business properly, marketing and improving our services, protecting against fraud and other liabilities, ensuring compliance and our ability to assert legal defenses, guaranteeing the security of our networks and systems, and protecting our assets, and
- in some specific circumstances, your consent.

When you visit our websites or otherwise request us to provide a service, we will notify you when information is required to provide our services or as required by law. Where your personal information is required, we may be unable to provide you with our services unless you provide us with the relevant information.

### **How we protect personal information we process on behalf of our customers**

In some instances, we process personal information on behalf of our customers as a service (in a data processor capacity). We collect and process this personal information only as instructed by our customer and will not use or disclose it for our own purposes.

We maintain information security controls to protect your information and will only disclose or transfer the personal information as instructed by the customer or to provide the requested service. Unless otherwise instructed by the customer, we treat the personal information we process on behalf of our customers in line with our commitments on disclosure and transfer as set forth in this notice.

### **How we manage privacy on our websites**

#### **Cookies, usage data and similar tools**

When you visit our websites, we collect certain information by automated means, using technologies such as cookies, pixel tags, browser analysis tools, server logs and web beacons. In many cases, the information we collect using cookies and other tools is used in a non-identifiable way, without any reference to personal information.

Cookies are small text files that a website transfers to your computer or other device's hard drive through your web browser when you visit a website. We may use cookies to make website sign-in and usage more efficient and to tailor your browsing preferences and improve the functionality of our websites. Cookies can be used for performance management, collecting

information on how our website is being used for analytics purposes. They can also be used for functionality management, enabling us to make the user's visit more efficient by, for example, remembering language preferences, passwords and log-in details.

There are two types of cookies: session cookies, which are deleted from your device after you leave the website; and persistent cookies, which remain on your device for longer or until you delete it manually.

We may use Flash Cookies (also known as Local Stored Objects) and similar technologies to personalize and enhance your online experience. The Adobe Flash Player is an application that allows rapid development of dynamic content, such as video clips and animation. We use Flash cookies for security purposes and to help remember settings and preferences similar to browser cookies, but these are managed through a different interface than the one provided by your web browser. To manage Flash cookies, please see Adobe's website at <http://kb2.adobe.com/cps/526/52697ee8.html> or visit [www.adobe.com](http://www.adobe.com). We may use Flash cookies or similar technologies for behavioral targeted purposes or to serve interest-based advertising. You can opt out of targeted advertising by visiting [optout.aboutads.info](http://optout.aboutads.info).

Our server logs also collect information about how users utilize the websites (usage data). This data may include a user's domain name, language, type of browser and operating system, Internet service provider, Internet protocol (IP) address, the site or reference directing the user to the website, the website you were visiting before you came to our website and the website you visit after you leave our site, and the amount of time spent on the website. We may monitor and utilize usage data to measure the website's performance and activity, improve the website's design and functionality or for security purposes.

We may also use pixel tags and web beacons on our website. These are tiny graphic images placed on web pages or in our emails that allow us to determine whether you have performed a specific action. When you access these pages or open or click an email, the pixel tags and web beacons generate a notice of that action. These tools allow us to measure response to our communications and improve our web pages and promotions.

You can change your browser settings to block or notify you when you receive a cookie, delete cookies or browse our website using your browser's anonymous usage setting. Please refer to your browser instructions or help screen to learn more about how to adjust or modify your browser settings. If you do not agree to our use of cookies or similar technologies which store information on your device, you should change your browser settings accordingly. You should understand that some features of our websites may not function properly if you do not accept cookies or these technologies.

Where required by applicable law, you will be asked to consent to certain cookies and similar technologies before we use or install them on your computer or other device.

#### **Do Not Track Requests**

Some browsers have incorporated features that can send a signal to websites you visit to notify those sites that you elect not to be tracked (a "Do Not Track" signal). We currently do not respond to web browser Do Not Track signals because a uniform technological standard has not

yet been developed. To learn more about browser tracking signals and Do Not Track please visit <http://www.allaboutdnt.org/>.

### **Linked sites**

We may provide links to third parties' websites ("linked sites") from our websites. Linked sites are not necessarily reviewed, controlled or examined by us. Each linked site may have its own terms of use and privacy notice, and users must be familiar and comply with all such terms when using linked sites. We are not responsible for the policies and practices of any linked site, or any additional links contained in them. These links do not imply our endorsement of the linked sites or any company or service and we encourage users to read these linked sites' terms and notices prior to using them.

### **Children**

Our websites are not directed at children and we do not use our websites to knowingly solicit personal information from or market to children. If we learn that a child has provided personal information through one of our websites, we will remove that information from our systems.

### **Security measures for protecting personal information**

We apply appropriate technical, physical and organizational measures that are reasonably designed to protect personal information against accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access, in particular where personal information is transferred over a network, and against all other unlawful forms of processing. Access to personal information is restricted to authorized recipients on a need-to-know basis. We maintain a comprehensive information security program that is proportionate to the risks associated with the processing. The program is continuously adapted to mitigate operational risks and to ensure the protection of personal information taking into account industry-accepted practices. We will also use enhanced security measures when processing any sensitive personal information.

### **Sharing personal information with third parties**

We may use third parties to provide or perform services and functions on our behalf. We may make personal information concerning individuals available to these third parties, as necessary, to perform these services and functions. Any access to that personal information will be limited to the purpose for which the information was provided.

We may also make personal information concerning individuals available to public or judicial authorities, law enforcement personnel and agencies as required by law, including to agencies and courts in the United States and other countries where we operate. Where permitted by law, we may also disclose such information to third parties (including legal counsel) when necessary for the establishment, exercise or defense of legal claims or to otherwise enforce our rights, protect our property or the rights, property or safety of others, or as needed to support external audit, compliance and corporate governance functions.

Personal information may be transferred to a party acquiring all or part of the equity or assets of Adiant or its business operation in the event of a sale, merger, liquidation, dissolution, or sale or transfer of the substantial assets of Adiant or any of its business operations. We may also transfer and share such information to our affiliates within the Adiant group, in compliance with applicable law.

## International transfers of personal information

The third parties, subsidiaries and affiliates to whom your personal information can be disclosed may be located throughout the world; therefore information may be sent to countries having different privacy protection standards than your country of residence.

If you are a resident of the European Economic Area (“EEA”), we may transfer your personal information to countries that have not been found by the European Commission to provide adequate protection. In such cases, we take measures necessary to ensure that your personal information receives an adequate level of protection.

Adient has adopted Binding Corporate Rules (“BCRs”) which have been approved by the relevant European Data Protection Authorities. The BCRs ensure that personal information of covered individuals in the EEA is protected while being processed by our affiliates. To view our BCRs, please consult the following link: [www.adient.com/privacy](http://www.adient.com/privacy).

## Your Personal Information Rights

**Access, Correction and Transmission.** You may reasonably access the personal information pertaining to you. You also have the right to request to correct incomplete, inaccurate or outdated personal information. To the extent required by applicable law, you may request the transmission of the personal information you have provided to us to you or another company.

**Objection.** We respect your right to object to any uses or disclosures of your personal information that are not (i) required by law, (ii) necessary for the fulfillment of a contractual obligation, or (iii) required to meet a legitimate need of Adient (such as general administration disclosures for auditing and reporting purposes or internal investigations, management of network and information systems security, and protection of Adient’s assets). If you do object, we will work with you to find a reasonable accommodation. You may also withdraw your consent at any time in relation to our processing of personal information based on your consent.

**Deletion.** You may also request the deletion of your personal information, as permitted under applicable law. This applies, for instance, where your information is outdated or the processing is not necessary or is unlawful; where you withdraw your consent to our processing based on such consent; or where we determine we should accommodate an objection you have raised to our processing. In some situations, we may need to retain your personal information pursuant to our legal obligations or for the establishment, exercise or defense of legal claims.

**Restriction of processing.** You may request that we restrict processing of your personal information while we are processing your request or complaint pertaining to (i) the accuracy of your personal information, (ii) the lawfulness of the processing of your personal information, or (iii) our legitimate interests to process this information. You may also request that we restrict processing of your personal information if you wish to use the personal information for litigation purposes.

You may exercise these rights free of charge. However, Adient may charge a reasonable fee or refuse to act on a request if it is manifestly unfounded or excessive, in particular because of its repetitive character. In some situations, Adient may refuse to act or may impose limitations on your rights if, for instance, your request is likely to adversely affect the rights and freedoms of

others, prejudice the execution or enforcement of the law, interfere with pending or future litigation, or infringe applicable law. In all cases, you have a right to file a complaint with a Data Protection Authority.

### **Consent and opt-out choices**

By providing personal information to us, you understand and agree to the collection, processing, international transfer and use of such information as set forth in this Privacy Notice. Where required by applicable law, we will ask your explicit consent.

You may always object to the use of your personal information for direct marketing purposes, including related profiling activities. Also, in case you have specific reasons that relate to your particular situation, you may object to Adient's processing of your personal information on the basis of our legitimate interests. In such cases we will investigate your request and notify you as to how we intend to resolve it. You may withdraw any consent previously granted for a specific purpose, free of charge by clicking on relevant website links, following the directions contained in an email or by contacting our Privacy Office.

Please note that if you choose to withdraw your consent, you may not be able to participate in or benefit from the programs, services and initiatives for which you provided consent.

### **Data retention**

We will retain your personal information as long as necessary to achieve the purpose for which it was collected, usually for the duration of any contractual relationship and for any period thereafter as legally required or permitted by applicable law. Our retention policies reflect applicable local statute of limitation periods and legal requirements.

### **How to identify the responsible Adient entity**

To identify the Adient entity responsible for the processing of your personal information, you can ask your Adient business contact, consult the list of our locations on Adient public websites or contact our Privacy Office.

### **How to contact us and exercise your rights**

If you would like to communicate with us regarding privacy issues or have questions, comments or complaints, or for the exercise of your rights, please contact our Privacy Office at [ae-privacy@adient.com](mailto:ae-privacy@adient.com) or Adient Belgium BVBA, De Kleetlaan 7b, 1831 Diegem Belgium; alternatively, you may access our Request Form on [www.adient.com/privacy](http://www.adient.com/privacy).

### **Modifications to our Privacy Notice**

We reserve the right to change, modify, and update this Privacy Notice at any time. Please check periodically to ensure that you have reviewed the most current notice. If the changes will materially affect the way we use or disclose previously-collected personal information, we will notify you about the change by sending a notice to the primary email address associated with your account.

**Local addenda for certain countries**

We have extended the Privacy Notice with specific information for certain countries where required by applicable local law. You can find these complementary notices through the local addenda links on the Privacy homepage.

This Privacy statement is effective as of May 25, 2018