

# **REXNORD DATA PRIVACY POLICY**

## **I. CONTENT OF THE DOCUMENT**

This Data Privacy Policy (the "**Policy**") replaces the Data Privacy Policy dated May 25, 2018 and defines the updated minimum standards adopted by Rexnord Corporation and all of its US and foreign affiliates (collectively referred to as the "**Company**") with respect to handling personally identifiable information ("**Personal Data**") about customers, associates (prospective, current and former), suppliers, other partners, website or location visitors, and other individuals. Various geographic areas in which the Company operates, have enacted laws, rules and regulations restricting access to and collection, use, distribution and storage of Personal Data.

To this end, the Policy provides guidance on how Company associates, including officers and directors, as well as agents, third parties or other persons acting on behalf of the Company shall comply with and implement the relevant privacy principles and related local privacy documents as described below. Local privacy laws may impose additional requirements, and Company businesses and functional leads are responsible for properly addressing such local rules within the framework of this Policy and any privacy policies and documents that are referring to this Policy.

## **II. DEFINITIONS**

**Personal Data** or personal information includes any information about an Individual, such as a person's name; home address; email address such as name.surname@company.com; usernames and passwords, identification card number or associate ID; location data (for example the location data function on a mobile phone); an Internet Protocol (IP) address; a cookie ID; or any communication identifying an individual. Certain jurisdictions, such as California, also include information that is capable of identifying a particular household as "personal data" or "personal information."

**Sensitive Personal Data** is a subset of Personal Data. The definition of Sensitive Personal Data may vary from one jurisdiction to another, but generally includes Social Security Number, Tax ID, or other national identification number, credit or debit card number, bank account number, physical or mental health or medical conditions, biometric data (e.g. a fingerprint or facial scan), trade union membership, racial or ethnic origin, political opinions, religious beliefs, sexual orientation, details about disciplinary proceedings, and criminal record or history.

## **III. COMPANY GLOBAL PRIVACY PRINCIPLES**

Any Rexnord Associate may handle Personal Data only in accordance with the following principles (the "**Global Privacy Principles**"):

- a. Minimum Necessary.** Personal Data may only be obtained and handled for legitimate business and compliance purposes. When obtained or handled, Personal Data must be limited to the minimum necessary for the intended purpose(s) of use. While handling Personal Data is part of our normal business activity, and in general is lawful, we must respect individuals' rights of privacy regarding their data. In other words, each process must ensure that we use only the personal data we need, and that we distribute such data only on a need-to-know basis. That means that individuals working with data should have access to only that data which is necessary to perform their duties, and only that data

which is essential for the particular purpose at hand.

- b. Privacy Notice.** To the extent required by applicable law and in accordance with the local requirements, we must provide information to the Individual that explains the intended purposes of handling and using their Personal Data, and how to contact the Company with an easy-to-use means to raise complaints or questions about privacy issues.
- c. Access, Correction and Deletion.** To the extent required by applicable law, we must provide an Individual with the opportunity to: (a) request access to a copy of the Personal Data that the Company maintains about them; (b) correct any factually inaccurate or incomplete Personal Data; and (c) request the deletion or erasure of Personal Data. Such requests should be addressed on a case-by-case basis in accordance with applicable law and specific policies.
- d. Confidentiality and Security.** Reasonable and appropriate technical, organizational, physical, and administrative measures should be maintained to protect Personal Data against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access. Particular attention should be given to the protection of Sensitive Personal Data, including any situations involving unauthorized access to or disclosure of such Sensitive Personal Data. The Company protects the confidentiality and security of Personal Data in accordance with the IT Department's Security Policies.
- e. Training and Ongoing Review.** Training should be provided to relevant associates on a regular basis to confirm their understanding of the requirements of the Policy, and any relevant implementing policies and procedures.
- f. Onward Transfers.** Before sharing Personal Data with third parties or affiliates, Company should complete appropriate due diligence to ensure that the receiving entities adhere to the standards outlined in this Policy and should execute, as appropriate and/or if required by law, contractual terms to make this Policy and/or adherence to specific data privacy requirements binding.
- g. Seeking help.** Violations of the relevant privacy principles can subject the Company and potentially our associates to significant fines. Please consult with the appropriate member of your management team or the Legal Department if you need any assistance in understanding and complying with the relevant privacy requirements as they relate to your job function.

#### **IV. JURISDICTION-SPECIFIC PRINCIPLES**

It is the responsibility of local management and the functional leads to be familiar with and to implement measures to comply with local privacy laws.

#### **V. CHANGES TO THE POLICY**

The Legal Department is the Policy Owner for this Policy and any changes must be approved by the Legal Department.

#### **VI. QUESTIONS**

Any questions about this Policy should be directed to the Legal Department.