



Nexteer Overarching Global Privacy Policy

Policy Owner	CISO			
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02.27.17	04.01.17			
Applicable Division				
Global X	North America	Europe	South America	Asia Pacific

1.0 Introduction

Nexteer is obliged to have regard to follow laws, regulation and governance practices in respect of the handling and processing of data relating to individuals and corporate data including personal information of its customers, clients and other associated parties that further the deliverance of the business and operational capacity.

2.0 Commitment Statement

Nexteer promotes the highest standards of corporate citizenship. The company is committed to compliance with all applicable laws and regulations wherever it does business.

Nexteer respects and is committed to protecting the personal information of individuals and aligns its privacy policies and data protection practices with the law.

The commitment to protecting the personal information of individuals and associated data protection practices are extended through contract to its suppliers and partners.

Nexteer employees and those working on our behalf shall be informed of this policy and practices and are expected to follow them.

3.0 Scope

This policy applies to the processing of personal information including any person who processes or has access to any personal information processed or held by, or on behalf of Nexteer. This includes staff, volunteers, consultants, suppliers and partners, except where a contract with an individual defines different requirements.

4.0 Responsibilities

The Nexteer management board is ultimately accountable for compliance with this Policy and will ensure that all staff, volunteers, consultants, suppliers and partners are made fully aware of this Policy and their obligations and responsibilities, including full compliance with the corporate Code of Conduct.

Every employee, entity of the Nexteer group of companies, contractor and 3rd party working in association with the delivery of Nexteer services is responsible for upholding the standards established, including reporting violations consistent with applicable legal and regulatory requirements.



The Audit and Compliance committee is responsible for reviewing and monitoring the Company's policies and practices on compliance with legal and regulatory requirements.

5.0 Content and Statement of Intent

In line with the core values and ethics of the company, Nexteer is committed to fulfilling the obligation and responsibilities and follows the principles for the protection of individuals with regard to the processing of personal data and on the free movement of such data.

Nexteer policies and processes reflect current standards and principles with respect to the processing of personal and sensitive personal data and will abide by any laws and regulation specific to the countries in which Nexteer does business. The principles include:

1. **Fair and Lawful Processing.** Nexteer provides that all personal data shall be processed fairly, lawfully and in a transparent manner. Nexteer will provide notice to individuals regarding the type of personal information collected and its intended uses. Nexteer does not use personal information obtained from individuals for purposes that are incompatible with the purposes stated in notices. Nexteer also reviews the purposes for which information is to be collected from individuals to ensure that our data collection supports reasonable business requirements.
2. **Choice.** Nexteer provides a choice to individuals regarding the type of personal information collected and its intended uses. Nexteer does not sell, rent, or lease personal information of individuals and where the information may be used for a purpose other than the purpose for which it was originally collected individuals will be provided the opportunity to affirmatively or explicitly consent to that use.
3. **Data Transfers.** Nexteer will not transfer personal information to third parties unless:
 - (a) the third party provides sufficient guarantees in respect of the technical and organizational security measures governing the processing to be carried out, and take reasonable steps to ensure compliance with those measures.
 - (b) required to do so by law.
4. **Security.** Nexteer will ensure that appropriate technical and organizational measures shall be taken against unauthorized or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal information.
5. **Data Integrity and Purpose Limitation.** Nexteer takes reasonable steps to ensure that all personal information is adequate, relevant and not incompatible to the purposes for which it is collected and used and takes steps to ensure that all applicable data is accurate, complete, and kept up-to-date.
6. **Retention.** Nexteer will take reasonable steps to ensure that personal information processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
7. **Access.** Nexteer shall facilitate the exercise of an individual's rights under any associated and applicable legislation or regulation with respect to the processing of personal information, unless it is reasonable in all circumstances not to comply with the rights of the individual.
8. **Recourse.** Nexteer applies business best practice to process personal information in an open and transparent, fair and lawful manner and complies with relevant privacy and data protection laws in the locations in which it operates. Nexteer will respond to any complaint, disputes or requests for access to personal data promptly and in any event within any obliged or applicable timeframe.



6.0 Review and Monitoring

This Policy shall be reviewed annually or more frequently as business need dictates.

7.0 Glossary

Nexteer: means Nexteer Automotive Group Limited, its predecessors, successors, subsidiaries, divisions and groups around the world.

Personal Data: means any information relating to an identified or identifiable individual; an identifiable individual is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Sensitive Personal Data: means personal data consisting of information as to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health, sex life or sexual orientation. Data relating to criminal offences and convictions shall also be considered as sensitive personal data.

Personal Information: means personal data and/or sensitive personal data.

Processing: means any operation or set of operations performed upon personal information whether or not by automatic means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.

8.0 Document History

Revision Date	Version Number	Changed by	Description
02.27.17	V1.0	N/A	Initial Issue