



## General Data Protection Notice for Customers and Business Partners

### I. Introduction and scope

This General Data Protection Notice (the "Notice") applies to the processing of personal data by ZF Friedrichshafen AG and its affiliates as part of the worldwide ZF Group ("ZF Group"). For purposes of this Notice, affiliates means any company with respect to which ZF Friedrichshafen AG owns, directly or indirectly, more than 50% of the shares, together ZF ("ZF"). You will also find specific information for certain regions in Section XII. ZF considers protecting the personal data of all customers and business partners to be an important priority. This includes consumers as end-use customers and employees of our business partners in their role as contact persons and representatives in the context of a business relationship.

ZF is committed to processing Personal Data responsibly and in compliance with the applicable data protection laws in all countries in which ZF operates. This Notice describes the types of Personal Data ZF collects, how ZF uses that Personal Data, with whom ZF shares your Personal Data, and the rights you, as a Data Subject, have regarding ZF's use of the Personal Data. This Notice also describes the measures ZF takes to protect the security of the data and how you can contact us about our data protection practices.

### II. Contact details of the Data Controllers

The legal entities responsible for the collection and use of your Personal Data (the "Data Controllers") in your home country for the purposes described in this Notice are listed here: [Locations Worldwide - ZF](#).

### III. Contact details of the Data Protection Officer

A Data Protection Officer ("DPO") is designated for each legal entity where required by applicable law. The DPO is involved in all issues related to the protection of your personal data. In particular, the DPO is in charge of monitoring and ensuring compliance with this Notice and the applicable data protection laws. For any comments or questions, you may have regarding this Notice, please contact the ZF Group Chief Data Privacy Officer, who is also the DPO of ZF Friedrichshafen AG, at the following address:

Chief Data Privacy Officer  
ZF Friedrichshafen AG  
Headquarter / ZF Forum  
Löwentaler Straße 20  
88046 Friedrichshafen



Germany

You can also contact the ZF Group Chief Data Privacy Officer by e-mail at [privacy@zf.com](mailto:privacy@zf.com).

#### **IV. Categories of Personal Data processed**

We process the following Personal Data for a number of business purposes that we list further below:

- General identification information – ZF may process your name, contact information (including home address, home phone number and mobile phone number), citizenship and country of residence, date of birth, gender and languages spoken.
- Professional information – ZF may process information related to your profession including (without limitation) your job title, professional email address and phone number and your role/responsibility.
- Financial information – ZF may process financial information including (without limitation) your bank account number, credit card number, bank details and VAT number.
- Visitor information – ZF may process your name, contact details and car license plate when you visit ZF premises.
- Information you choose to share with ZF – ZF may process Personal Data you choose to share with ZF, including (without limitation) information you share when you contact our customer support service.
- Information relating to sourcing and procurement – when you provide services or sell products to ZF or when ZF provides services or sells products to you, ZF may process information necessary for the provision of the services or the selling of the products including (without limitation) your contact details and financial details.
- Warranty information – ZF may process your name, contact details, financial information and information on the product(s) purchased when you submit a warranty request.
- CCTV footage – ZF may process footage of you obtained through our use of CCTV surveillance systems at our premises. For more information, please consult the specific data protection notices displayed at our premises.
- Survey results – ZF may process your responses to questions in our customer surveys.
- Information collected through your use of ZF apps – ZF may process Personal Data relating to your use of ZF apps. For more information, please consult the specific data protection notices of the respective ZF app.
- Passwords or other personal identifiers – ZF may process the password or other personal identifier that you use when you register on a ZF website, platform or device and help you register if you forget such password or personal identifier. For more information, please consult the specific data protection notices of the respective ZF website, platform or device.



- Proof of identity – ZF may, in certain circumstances, ask for your identity card or other proof of your identity (e.g. driver's license)
- Website information - ZF may process information related to your use of ZF websites including (without limitation) your browser type and version, your browsing history and the pages you accessed on a ZF website. For more information, please consult the specific data protection notices of the respective ZF website.
- Data from an end-use customer's vehicle consisting of the vehicle identification number (VIN), the license plate number, as well as transmission records and other vehicle-generated data related to an individual person's driving style.
- Quotes, interviews and other content you have provided for communication purposes.

The Personal Data processed is limited to the data necessary for carrying out the business purpose for which such Personal Data is collected. ZF will maintain Personal Data in a manner that ensures it is accurate, complete and up-to-date.

ZF will collect the Personal Data as a general rule directly from the Data Subject. However, in line with legal provisions, data may also be collected from third parties. In particular, this applies to data regarding an end-use customer's vehicle in the event that automotive manufacturers return to ZF products that have been sold to them to be incorporated in their vehicles.

## **V. Purposes of data processing and legal bases**

ZF processes Personal Data in accordance with applicable data protection laws and regulations and only for limited, explicit and legitimate purposes. ZF will not use Personal Data for any purpose that is incompatible with the original purpose for which it was collected unless you provide your prior explicit consent for further use.

Personal Data relating to customers and business partners may be processed for the purposes of:

- Development and management of customer/business partner relationship
- Internal administration purposes (including maintenance of accurate accounts payable and receivable records)
- Customer support service
- Corporate housekeeping
- Contract management
- Product, warranty and claims administration
- Order processing and order fulfilment
- Demand planning and production
- Dispute management and litigation
- Training and certification



- Sourcing and procurement
- Business development
- Compliance with labor, tax and social security laws and other legal or regulatory requirements (e.g. meeting governmental reporting and records requirements)
- Research, development and improvement of ZF products and services (including sales and market research (e. g. through surveys))
- IT support
- Public relations
- Direct marketing
- Facilities, security and contingency planning purposes
- Network and device usage optimization and related security controls (including access to myWABCO)
- Preventing, detecting and investigating fraud
- To monitor and enforce compliance with ZF policies and procedures
- To monitor and enforce compliance with legal requirements applicable to ZF or contractual obligations (including the requirements set out in your contract with ZF)
- Events
- To perform internal and external audits
- To conduct corporate transactions (including mergers, acquisitions and divestments)
- Managing product research and development ("R&D")
- Product support and maintenance, failure diagnostic and identification of fault patterns.
- Creation of texts based on archival data and our own publications. (For this processing, we also use automated methods, including AI-powered systems. The results produced by AI are reviewed by staff and are not adopted without verification.)

The Personal Data is being collected and processed on the following legal basis:

- if it is necessary for performing a contract you have concluded with ZF (e.g. if you sell a product to ZF, ZF needs your bank account number in order to pay for the product);
- if it is necessary for complying with a legal obligation that applies to ZF (e.g. ZF may need to collect your VAT number to meet its tax obligations);
- if it is necessary for pursuing ZF's legitimate interests, considering these interests are not overridden by your fundamental rights and freedoms (e.g. if ZF needs certain of your Personal Data for internal administrative purposes, for ensuring network and information security and to improve its products and services);
- when you consented to this (e.g. when you consented to receiving a ZF newsletter).

In order to comply with legal provisions and the ZF Code of Conduct, ZF supports the fight against terrorism, in particular taking into account EU Anti-Terrorism Regulations No. 2580/2001 and No.



881/2002. For this reason, ZF processes the data required for this purpose in order to enforce the statutory regulations within the framework of the provisions regarding data protection law.

## VI. Data Security

ZF has implemented appropriate technical and organizational measures to ensure a level of security appropriate to the risk, such risk analysis includes an analysis of the risk of compromising the rights of the Data Subject, costs of implementation, and the nature, scope, context and purposes for data processing.

The measures include

- (i) encryption of personal data where applicable/appropriate;
- (ii) the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- (iii) the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident; and
- (iv) a process for regularly testing, assessing and evaluating the effectiveness of technical and organizational measures for ensuring the security of the processing.

## VII. Recipients of Personal Data

ZF Friedrichshafen AG is the corporate headquarter of the ZF Group. Due to shared corporate IT systems within the ZF Group and because of the international nature of our business, Personal Data collected and processed by ZF Friedrichshafen AG and its subsidiaries ("ZF legal entities") can be shared with or accessed by other ZF legal entities of the ZF Group for the purposes above. A data transfer to ZF legal entities outside of the EU/European Economic Area ("EEA") will only occur under the provisions for international data transfers laid out in Section VIII of this Notice (see below). An overview of the ZF legal entities that are part of the ZF Group can be found at:

<https://www.zf.com/locations>

Further, ZF may share your Personal Data with:

- Suppliers of IT and collaboration related services;
- Banks and insurers;
- Providers of sales related services;
- Providers of marketing, research and communications related services;



- Providers of training related services;
- Professional advisers;
- Law enforcement authorities (including police and judicial authorities);
- Other public authorities (including social security and tax authorities).

ZF will also disclose your Personal Data to third parties:

- in the event that ZF sells or buys any business or assets, in which case ZF may disclose your Personal Data to the prospective seller or buyer of such business or assets;
- if ZF or substantially all of its assets are acquired by a third party, in which case the Personal Data ZF holds about you may be one of the transferred assets;
- if ZF is under a duty to disclose or share your Personal Data in order to comply with any legal obligation or to protect the rights, property or safety of ZF, its customers or others. This includes exchanging Personal Data with public authorities (including judicial and police authorities) in the event of, for example, a cyber security incident; and
- if you specifically consented thereto.

When disclosing your Personal Data to third parties that will process your Personal Data on ZF's behalf, your Personal Data will only be disclosed to carefully selected data processors acting on the basis of ZF's instructions to comply with the applicable legal and contractual obligations.

#### **VIII. International data transfers**

International data transfers refer to transfers of Personal Data outside of the EU/EEA. The international footprint of ZF involves the transfer of Personal Data to and from other group companies or third parties, which may be located outside the EU/EEA, including the United States of America.

In case your Personal Data is transferred outside of the EU/EEA, ZF will make sure that your Personal Data is protected by the following safeguards:

- the laws of the country to which your Personal Data is transferred ensure an adequate level of data protection (Article 45 of the EU General Data Protection Regulation (2016/679)(GDPR));
- the transfer is subject to data protection clauses approved by the European Commission (Article 46.2 GDPR); or
- any other appropriate safeguards under article 46 GDPR.

If you wish to receive more information relating to the transfers of your Personal Data outside the EU/EEA and/or the safeguards that have been implemented (including on how to receive a copy of these), you can contact the ZF Group Chief Data Privacy Officer (see Section III. above).



## IX. Retention of Personal Data

ZF will not retain your Personal Data for longer than is allowed under the applicable data protection laws and regulations or for longer than is justified for the purposes for which it was originally collected. As a general rule, collected data will be deleted as soon as there no longer exists a business relationship with the customer/business partner or in the event of communication inactivity for the duration of a period of 2 years. However, collected data may be subject to retention requirements pursuant to applicable legal provisions. In other cases, Personal Data may be stored and retained for as long as the statutory period of limitations with regards to legal claims against ZF has not expired.

## X. Data protection rights

Depending on and subject to applicable laws, you have certain rights regarding the Personal Data ZF holds about you:

- you have the right to access the Personal Data ZF keeps about you – this is because ZF wants you to be aware of the Personal Data ZF has about you and to enable you to verify whether ZF processes your Personal Data in accordance with the applicable data protection laws and regulations;
- you have the right, under certain circumstances, to block or suppress further use of your Personal Data. When the processing is restricted, ZF can still store your Personal Data, but can no longer use it;
- if your Personal Data is inaccurate or incomplete, you have the right to request the rectification of your Personal Data;
- you have the right, under certain circumstances, to request the deletion or removal of your Personal Data from ZF systems;
- if ZF's processing of your Personal Data is based specifically on your consent, you have the right to withdraw that consent at any time. This includes your right to withdraw consent to ZF's use of your Personal Data for direct marketing purposes;
- you have the right to obtain from ZF, under certain circumstances, your Personal Data in a structured, commonly used and machine-readable form so you can reuse it for your own purposes across different services;
- you also have the **right to object** to certain types of processing, including processing for direct marketing purposes.



However, note that ZF may need to retain certain Personal Data, for example for legal or administrative purposes (e.g. keeping of accounting records).

You can exercise these rights at any time by contacting the ZF Chief Data Privacy Officer (see Section III. above). For all requests set out above, please send us a letter or email with “Data Subject Request” in the subject line.

You also have the right to lodge a complaint about the way ZF handles or processes your Personal Data with your national data protection authority.

## **XI. Notice Compliance and Contact Information**

Monitoring and ensuring compliance of the Personal Data processing within ZF with this Notice and applicable data protection laws and regulations is the responsibility of the ZF Chief Data Privacy Officer and of your local DPO, where applicable.

You may contact the ZF Group Chief Data Privacy Officer with regard to any issue related to processing of your Personal Data and to exercise your rights as mentioned above.

## **XII. Additional information for certain regions**

This section provides additional information for certain regions outside the EU, UK and Switzerland as described in section I.

### **Japan Addendum**

This Addendum supplements the information contained in the Notice and applies solely to customers and business partners which are located in Japan or receive services in Japan. The names of the entities that are responsible for information management in Japan can be found at [https://www.zf.com/site/locations/en/asia\\_pacific/japan\\_locations/japan.html#undefined](https://www.zf.com/site/locations/en/asia_pacific/japan_locations/japan.html#undefined)

#### **1. Joint Use**

With respect to the categories of Personal Data processed as described in Section IV above, we may use the personal data for the purposes described in Section V above and may provide the personal data to ZF Friedrichshafen AG, the parent company of us, and ZF Friedrichshafen AG’s affiliated companies (including ZF Asia Pacific Group Co., Ltd.). An overview of the ZF legal entities that are part of the ZF Group can be found at: <https://www.zf.com/locations>

The company responsible for managing the shared use:



ZF Japan Co., Ltd

231-0023 Kanagawa, Yokohama, Yamashita-cho, Naka-ku 209, Teisan Kannai Building, Japan

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In the case of international transfer of personal data, we will, as necessary, obtain consent from you, or confirm that the data recipient has taken the measures that are in line with the purposes of the provisions of APPI by way of its established privacy policy or otherwise.

## 2. Your rights as a data subject

In Japan, you may have the rights described in "X. Data protection rights" above.

## Korea Addendum

Additional Information for Residents of South Korea

This clause applies only to your use of our websites, apps, or services that are subject to the Notice in the South Korea and supplements the Notice.

### 1. Provision of personal data to third parties

We do not provide personal data to third parties.

### 2. Delegation of Personal Data Processing

We delegate the processing of personal data as follows:

Trustee	Description of delegated tasks
ZF Friedrichshafen AG and its affiliates *	Customer information analysis and market research
SAP	Providing marketing platforms and operating marketing services, managing and operating application servers



Navision	Managing customer data related to queries, marketing campaigns, agreements, and contracts
SalesCore	Storage and management of customer information
SupplyOn	Managing supplier relationship.
SalesForce	Storage and management of customer information

\* For more information about our headquarters and affiliates, please visit the ZF website (<https://www.zf.com/locations>).

### 3. International Transfer of Personal data

We entrust the processing of personal data through an overseas trustee as follows:

Recipient (Contact Information)	Countries to which personal data is transferred	Previous Date	How to transfer	Items of personal data transferred	Purpose of use of personal data by the recipient	Retention and use period of the recipient
ZF Privacy@zf.com	Germany	continuous	Data collection and transmission over a dedicated network	Name, email address, mobile phone number, gender	Customer care and product promotion, customized product production	Until the purpose of the processing is achieved.



<p>SAP Privacy@sap.com</p>	<p>Germany</p>	<p>continuous</p>	<p>Data collection and transmission over a dedicated network</p>	<p>Automatically generated information, including name, email address, username, address, mobile phone number, telephone number, occupation, gender, date of birth, and service usage history</p>	<p>Providing marketing platforms, operating services, and managing and operating application servers</p>	<p>Until the purpose of the processing is achieved.</p>
<p>Navision <a href="https://aka.ms/privacyresponseother">https://aka.ms/privacyresponseother</a></p>	<p>Germany</p>	<p>Continuous</p>	<p>Data collection and transmission over a dedicated network</p>	<p>Name, mobile phone number, address, email address</p>	<p>Consignments services to manage customers (and prospects) and provide services for the smooth performance of contracts</p>	<p>Until the purpose of the processing is achieved.</p>
<p>SalesCore info@salescoreglobal.com</p>	<p>Germany</p>	<p>Continuous</p>	<p>Data collection and transmission over a</p>	<p>Name, mobile phone number, address,</p>	<p>Consignments services to manage customers (and prospects)</p>	<p>Until the purpose of the processing is achieved.</p>



			dedicated network	email address	and provide services for the smooth performance of contracts	
SupplyOn datenschutz@supplyon.com	Germany	Continuous	Data collection and transmission over a dedicated network	Name, mobile phone number, email address	Management of supplier master data.	Until the purpose of the processing is achieved.
SalesForce privacy@salesforce.com	Germany	Continuous	Data collection and transmission over a dedicated network	Name, address, mobile phone number, email address	Consignment services to manage customers (and prospects) and provide services for the smooth performance of contracts	Until the purpose of the processing is achieved.

#### 4. Destruction of personal data

We destroy personal data as follows:

Destruction procedure: Personal data to be destroyed is selected and destroyed after obtaining approval from Data Privacy team.

Destruction method: Personal data recorded and stored in electronic files will be destroyed in an irrevocable way, and personal data recorded and stored in paper documents will be shredded or incinerated.



## 5. Additional use and provision

We may further use or provide your personal data without your consent after considering the following:

whether the further use or provision of personal data is related to the original purpose for which it was collected;

whether the further use or provision of personal data is foreseeable in light of the circumstances in which the personal data is collected or the practices in which the personal data is processed;

whether the further use or provision of personal data unfairly infringes on the interests of users; and

Whether the necessary measures have been taken to ensure security, such as pseudonymization or encryption.

### **Singapore Addendum**

This Addendum supplements the information contained in the Notice and applies solely to customers and business partners which are located in Singapore or receive services in Singapore. The names of the entities that are responsible for information management in Singapore can be found at [https://www.zf.com/site/locations/en/asia\\_pacific/singapour/singapore.html](https://www.zf.com/site/locations/en/asia_pacific/singapour/singapore.html)

#### 1. International data transfer

When we transfer personal data from Singapore to a third country outside Singapore, we take reasonable steps to ensure that the protection afforded to the personal data in the country of origin applies to the transfer of personal data and that the transfer will take place in compliance with applicable laws.

#### 2. Contact information

If you have any questions or comments about this Addendum, the Notice, the ways in which ZF collects and processes your personal data described in this Addendum or in the Notice, your choices and rights regarding such use, or wish to exercise your rights under applicable law, please do not hesitate to contact us via [privacy@zf.com](mailto:privacy@zf.com).

When you contact us, we may require that you submit certain forms or provide certain information, including verification of your identity, before we are able to respond.

### **India Addendum:**

#### 1. Scope and relationship to the global notice



This Addendum supplements ZF's General Data Protection Notice for Customers and Business Partners and applies when ZF entities in India process digital personal data of individuals in India. In case of any conflict with the global notice, this Addendum will prevail for processing under India's Digital Personal Data Protection Act, 2023 (DPDPA).

## 2. Who we are (Data Fiduciary) and covered entities

For processing in or from India, the relevant ZF entity acts as the Data Fiduciary and may engage contracted Data Processors. This Addendum applies to ZF Group entities operating in India. ZF operates through multiple entities, manufacturing sites, and engineering centers across India. You can find the list of legal entities and [their addresses here](#). This list will be updated as the corporate structure evolves.

## 3. Key definitions (DPDPA)

- Personal Data: Any data that identifies an individual.
- Processing: Activities such as collection, storage, use, sharing, or erasure of digital personal data.
- Data Principal: The individual whose personal data is processed.
- Data Fiduciary / Data Processor: As defined under the DPDPA.

Note: The DPDPA applies to digital personal data, including data originally collected on paper and later digitized.

## 4. Why we process your data (purposes)

ZF processes personal data for purposes such as customer and supplier management, compliance, auditing, security, and permitted communications/marketing, consistent with our global notice and in line with DPDPA's lawful purpose requirement.

## 5. Our legal bases under Indian law

ZF processes personal data under the grounds permitted by the DPDPA:

- Consent: Obtained with clear notice describing data, purpose, rights, and contact details. Consent can be withdrawn easily. Notices are available in English or any Eighth Schedule language.
- Certain Legitimate Uses: As allowed under Section 7, including:



- When you voluntarily provide data for a specified purpose without objection (e.g., contact details for a quote).
- Compliance with Indian law, court orders, or required disclosures to the State.
- Medical emergencies, public health measures, or disaster response.

#### 6. Children's data

If we process data of a child (under 18), we obtain verifiable parental or guardian consent and do not engage in tracking, behavioral monitoring, or targeted advertising. If child data is collected without consent, we delete it promptly upon discovery.

#### 7. What we collect (categories)

Depending on the relationship, we may process identification and contact details, business role, contract and transaction data, compliance screening information, site logs/CCTV, and IT metadata for security only as necessary for the specified purpose under the DPDPA.

#### 8. Where we obtain data from (Data Principal)

- You (e.g., business cards, emails, forms, portals)
- Your employer (if you represent a customer or supplier)
- ZF group companies, service providers, and, where permitted, public sources

#### 9. Sharing and international transfers

We share personal data within the ZF Group and with contracted Data Processors under appropriate safeguards. Cross-border transfers are generally allowed under Section 16 of the DPDPA unless restricted by government notifications. ZF will comply with such restrictions and any stricter sectoral regulations.

#### 10. Security and retention

We apply appropriate security measures and require the same from our processors. In case of a breach, we will notify the DPBI and affected individuals as required by law. Personal data is erased when no longer needed or if consent is withdrawn, unless legally required to retain, and processors are instructed accordingly.

#### 11. Your rights under DPDPA



- Access information about your personal data.
- Request correction, completion, updating, or erasure.
- Use our grievance mechanism and, if unresolved, approach the Data Protection Board of India.
- Nominate someone to exercise your rights in case of death or incapacity.

## 12. How to exercise your rights / contact us

Contact the Grievance Officer of the relevant ZF entity or email [privacy@zf.com](mailto:privacy@zf.com). We will respond within DPDPA timelines. Please use ZF's grievance process before approaching the Data Protection Board of India. DPDP rules in India are under consultation. ZF will update this Addendum once they're finalized.

Note: You can find the list of Legal Entities at the following link: [ZF India Locations](#). For more information, please reach out to [privacy@zf.com](mailto:privacy@zf.com)

### **Brazil Addendum:**

Subject to certain exceptions and limitations under applicable law, you have the right to request our confirmation as to whether or not your personal data is being processed and, if so, to access your personal data. You also have the right to request the rectification of inaccurate personal data. If the respective requirements are met you have the right to request the completion or deletion of your data.

You have the right to object to the processing of your personal data at any time, as long as it is regarding secondary purposes of processing. For direct marketing purposes, you can object to the processing of your personal data at any time. If you have given your consent to the processing of your personal data, you have the right to request the withdrawal of this consent at any time with effect for the future. The legality of the data processing before its withdrawal remains unchanged.

You have the right to lodge a complaint with the supervisory authority responsible for your place or state of residence:

Autoridade Nacional de Proteção de Dados (ANPD)

Setor Comercial Norte - SCN, Quadra 6, Conjunto "A", Edifício Venâncio 3000, Bloco "A", 9º andar, CEP 70.716-900 - Brasília – DF.

Phone: (61) 2017-3338 and 2017-3339



[https://www.gov.br/anpd/pt-br/canais\\_atendimento/fale-conosco](https://www.gov.br/anpd/pt-br/canais_atendimento/fale-conosco)

### **California Addendum:**

This addendum is provided to comply with the California Consumer Privacy Act of 2018 (CCPA) and California Privacy Rights Act of 2020 (CPRA).

Reflecting the broad range of contexts in which we interact with individuals, we have provided a broad list of potential categories of personal information we could collect about you, most of which will not apply to most people. The information we may have collected about you in the last twelve (12) months can be found in Section IV. For the respective purposes see Section V and for information on disclosure see Section VII.

ZF will collect the Personal Data as a general rule directly from the Data Subject. However, in line with legal provisions, data may also be collected from third parties.

Interactions with us are intended for individuals 16 years of age and older. If you believe that we have collected Personal Information of minors under 16, please contact us at the address below.

California residents may have certain rights. Once we receive and confirm your verifiable request, we may process the following requests:

**Right to Know** – You have the right to request information about our collection and use of your personal information over the past 12 months. We will disclose to you the categories of personal information we have collected about you, as well as the categories of sources from which such information is collected, the purpose for collecting such information, the categories of third parties with whom we share such information, and information about our sale or disclosure of your personal information to third parties and the purpose of it.

**Right to Erasure** – You have the right to request the deletion of any of your personal information that we collected from you, as far as statutory requirements are fulfilled.

**Right to Correct** – You have the right to request that we correct any inaccurate personal information that we collected from you and retained.

**Right to Opt-Out of Sale and Sharing** – You have the right to opt-out of the sale and sharing of your personal information to third parties. Please note that we do not “sell” or “share” your Personal Information, as such terms are defined in the CCPA.

**California “Shine the Light” Privacy Rights** – This law permits customers who are residents of California to request certain information that ZF disclosed to third parties for direct marketing purposes in the preceding calendar year, and the names and addresses of those third parties. As already mentioned



above, we currently do not share any Personal Information with third parties for direct marketing purposes.

We will not discriminate against you for exercising these rights. Only you or an authorized agent that you authorize to act on your behalf may make a verifiable request related to your personal information.

We may request additional information to verify your request. We will not use this additional information for anything other than handling your request. We endeavor to respond to all verifiable requests within forty-five (45) days. If we require more time, we will inform you of the reason and extension period in writing. You may exercise your rights under California law by submitting a request to [privacy@zf.com](mailto:privacy@zf.com) or according to section III. Please refer to „CCPA & CPRA“ or “Shine the Light” in your message.

### **Canada Addendum**

The following additional provisions apply to Individuals located in Canada.

ZF and its service providers may access, store and otherwise process personal data outside of your province, including in other parts of Canada, the United States, and other foreign jurisdictions where we or our service providers are located. We may disclose your personal only if we are required or permitted by applicable law.

Subject to certain exceptions and limitations under applicable law, you have the right to access, update, rectify and correct inaccuracies in your personal data and withdraw your consent to our collection, use and disclosure of your personal data. We may request additional information to verify your request. We will not use this additional information for anything other than handling your request.

You may exercise your rights under Canadian law by submitting a request to [privacy@zf.com](mailto:privacy@zf.com) or according to section III. Please refer to „Canadian Privacy Law“ in your message.

### **Mexico Addendum**

Subject to certain exceptions and limitations under applicable law, you have the right to request our confirmation as to whether or not your personal data is being processed and, if so, to access your personal data. You also have the right to request the rectification of inaccurate personal data. If the respective requirements are met you have the right to request the completion or deletion of your data. You have the right to object to the processing of your personal data at any time, as long as it is regarding secondary purposes of processing. For direct marketing purposes, you can object to the processing of your personal data at any time. If you have given your consent to the processing of your personal data, you have the right to request the withdrawal of this consent at any time with effect for the future. The legality of the data processing before its withdrawal remains unchanged.



You have the right to lodge a complaint with the supervisory authority responsible for your place or state of residence or to the supervisory authority:

National Institute of Transparency, Access to Information and Protection of Personal Data (INAI)  
Av. Insurgentes Sur # 3211, Col. Insurgentes Cuicuilco,  
Alcaldía Coyoacán, C.P. 04530, Ciudad de México,  
Phone number: 800 835 4324  
E-mail: [atencion@inai.org.mx](mailto:atencion@inai.org.mx)

### **Turkey Addendum**

The legal entities responsible for the collection and use of your Personal Data (the “Data Controllers”) in Turkey for the purposes described in this Notice are ZF CVS Turkey Fren Sistemleri Sanayi Ticaret Limited Şirketi, ZF Lemförder Aks Modülleri Sanayi ve Ticaret Anonim Sirket, ZF Lemförder TLM Dış Ticaret Limited Şirketi, ZF Sachs Süspansiyon Sistemleri Sanayi ve Ticaret A.Ş., ZF Services Türk San. ve Tic. A.Ş.

Depending on and subject to applicable laws, you have certain rights according to Article 11 „Kişisel verilerin korunması kanunu” (KVKK) regarding the processing of your personal data by ZF:

You have the right to know whether personal data is being processed, which data is being processed, to know the purpose of the processing and whether the processing is carried out in accordance with the purpose, whether the data will be disclosed to domestic or foreign third parties, the possibility of correcting data in the event of incomplete or incorrect processing, the right to request the erasure or destruction of data under the conditions of Art. 7. You have the right to be informed about the actions forwarded to third parties, in particular the forwarding of the deletion request. You also have the right to object where the processing and analysis of data by automated systems produces an unfavorable result for the data subject and the possibility of claiming compensation in the event of unlawful data processing activity.

You may exercise your rights under Turkish law by submitting a request to [privacy@zf.com](mailto:privacy@zf.com) or according to section III. Please refer to „KVKK” in your message.

### **China Addendum**

This China Notice is a supplement to the General Data Protection Notice (the “Notice”) and provides additional information about personal data processing as required by the China Personal Information Protection Law and its implementing rules and regulations (“Applicable Chinese Law”). In case of any inconsistencies between the Notice and the China Notice, this China Notice prevails.



With respect to this China Notice, "Personal Data" means "Personal Information" as defined under Applicable Chinese Law. Personal Data is any electronic or otherwise recorded information related to identified or identifiable natural persons, excluding anonymized data.

#### Personal Data that We Process

Under Applicable Chinese Law, the following non-exhaustive types of Personal Data that we collect from you, as necessary, may be considered sensitive Personal Data under Applicable Chinese Law:

- Financial information; and
- Proof of identity.

#### Why We Process Personal Data

We process your Personal Data under a lawful basis of processing as provided by Applicable Chinese Law. Additionally, we process your Personal Data for the purposes described under section "V. Purposes of data processing and legal bases" in the Notice.

We collect and use sensitive Personal Data for the following purposes:

- Comply with requirements and applicable laws;
- Sourcing and procurement;
- Product, warranty and claims administration;
- Data subject request management; and
- General business management and operations.

We will adopt strict security measures when processing sensitive Personal Data.

#### Cross-Border Transfer of Personal Data

ZF operates globally. In order to perform general business management and operations, fulfill legal obligations, and for other lawful purposes, ZF may transfer Personal Data collected from you in China to ZF's affiliated entities outside of China, for example, Germany where ZF is headquartered. When your Personal Data is transferred outside of China, we will ensure that the transfer complies with Applicable Chinese Law and will implement appropriate and necessary measures to provide an equivalent level of data protection in accordance with Applicable Chinese Law.

### **XIII. Miscellaneous**

This Notice will be effective as of 01<sup>st</sup> January 2026 and will be applicable to ZF (see Section I. above for a precise definition of the scope).



This Notice may be revised and amended from time to time.

ZF is allowed to adapt the text of this Notice only in order to be compliant with local legislation by means of an addendum attached to this Notice. In case of any discrepancies between this Notice and a specific local addendum made in accordance with local law, the terms of the latter will prevail.