

## **CNH INDUSTRIAL PRIVACY POLICY**

### **General Terms**

The CNH Industrial Group appreciates your interest in its products and your visit to this website. The protection of your privacy in the processing of your personal data is an important concern to which we pay special attention in our business processes. We process personal data collected during visits to our websites in accordance with the legal provisions valid for the countries in which the websites are maintained.

This Privacy Policy relates to our use of any personal information you provide to us.

### **What information about you is collected by CNH Industrial?**

The CNH Industrial Group collects personal data belonging to its employees, contractors, suppliers and customers that is relevant for the business purposes described below. This information may include your name, contact details as well as the information regarding invoicing and handling as well as credit card information. In order to optimize our further notifications to you and continually improve our products and services (including registration) we may ask you for information about your personal or professional interests, demographic background, your experiences with our products and services as well as more detailed information pertaining to our contact with you. We may also use your IP address for some of our website services. Information on the “cookies” that we use and their features can be found in our Cookies policy.

Personal data does not include information that is not identified or identifiable to a natural person, or information that has been stripped of all identifiers such that an individual cannot be identified or re-identified.

### **How will your personal information will be used by CNH Industrial?**

CNH Industrial will use your personal information only to the extent it is compatible with the following purposes:

- For legitimate business purposes and objectives (including, but not limited to, providing services, financing, customer support, product safety, marketing, promotions and recruitment of employees) in compliance with the principles of relevance, pertinence, and utilizing processing methods adequate to such objectives (e.g. to provide you with password reminders or to notify you that a particular service has been suspended for maintenance);
- For compliance with processes and procedures provided for by the Group’s system for protection of company data, according to which all data is classified in order to determine and perform necessary security measures;
- You will be notified regarding the purposes of each processing operation of your personal data as necessary for compliance with applicable law;

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- For service administration purposes, which means that CNH Industrial may contact you for reasons related to the service you have signed up for;
- The CNH Industrial Group recognizes and respects the interested person's legal rights, such as, among others, the right to access his/her own personal data, the right to obtain the updating, rectification or integration of data, the right to cancel the data in cases provided for by applicable laws;
- When required by applicable laws, personal data may be disclosed to third parties, if necessary, in relation to processing purposes and subject to the interested person's consent as required for compliance with applicable law;
- To personalise or improve the way CNH Industrial content and advertising is presented to you online:
  - To manage our competitions and contact the winners;
  - To provide assistance in the use of the services and in general for the management of the site;
  - To meet product orders or requests for services or information; to process payments; and to keep our records up to date;
  - Where you have specifically consented to be contacted for these purposes, to send you direct marketing by telephone, post or email about special offers and current or new products that you may be interested in;
- Where CNH Industrial proposes using your personal information for any other purpose incompatible with the purpose(s) for which your personal data was originally collected or authorized, we will notify you first and you will also be given the opportunity to withhold or withdraw your consent.

Sensitive data (including data that could allow the disclosure of political opinions, sexual orientation, racial or ethnic origin, health or medical condition, religious or philosophical beliefs, sex life, and trade union membership) and "judicial data" processing operations shall occur only when strictly necessary to pursue Group business objectives and always in compliance with applicable laws, within the limits permitted by the applicable laws and, when necessary, upon the consent of the interested person. In the event that sensitive data is disclosed to a non-agent third party or used for a purpose other than for which it was originally collected or subsequently authorized, your explicit consent (opt-in) will be obtained before any such disclosure or use.

### **With whom does CNH Industrial shares your Personal Information?**

Generally, we will only use your information within the CNH Industrial Group of companies in order to provide the service/product you have requested. We will not pass your information to other members of the CNH Industrial Group for marketing purposes unless you have consented to this.

We will require all third party data processors to whom your information is disclosed to comply strictly with our instructions and CNH Industrial will require that they do not use your personal information for their own business purposes.

Where we share your information with third parties, we will ensure they treat your information with the same protection we do. If personal information is transferred to a non-agent third

party, you will be given an opportunity to choose not to have your personal information shared with that third party.

### **When will CNH Industrial use your Personal Information to contact you?**

CNH Industrial may contact you:

- in relation to the functioning of any service you have signed up for to ensure that CNH Industrial can deliver the services to you;
- in relation to any contribution you have made to any CNH Industrial website, message board or other service;
- where you have opted to receive newsletters or other correspondence;
- to invite you to participate in surveys about CNH Industrial products or services (participation is always voluntary);
- to carry out obligations arising from any contracts entered into between you and CNH Industrial; and
- for marketing purposes where you have specifically agreed to this (see “Will CNH Industrial contact you for marketing purposes?” below).

Our websites will give you detailed information about how CNH Industrial will contact you in relation to specific products or services.

### **Will CNH Industrial contact you for marketing purposes?**

Occasionally we also utilise your information to contact you within the scope of a market study or to transmit marketing information to you, of which we think it could be of special interest to you. But we always grant you the option to opt-out of marketing information or market research inquiries. You can also declare in advance that you would not like to be contacted by us without being asked. Furthermore, you have the possibility to withdraw your consent at any time.

### **Inappropriate or offensive content**

If you post or send offensive, inappropriate or objectionable content anywhere on a CNH Industrial Group website, or otherwise engage in any disruptive behaviour, CNH Industrial may use your personal information to stop such behaviour.

Where CNH Industrial reasonably believes that you are or may be in breach of the law (e.g. because content you have posted may be defamatory), CNH Industrial may use your personal information to inform relevant third parties such as your employer, school, e-mail/Internet provider or law enforcement agencies about the content and your behaviour.

### **If you are aged 18 or under**

If you are aged 18 or under, please obtain your parent/guardian's permission before you provide personal information to the CNH Industrial Group. Minors without consent are not allowed to provide us with personal information.

### **What is our data retention policy?**

We will hold your personal information on our systems for as long as is necessary for the relevant product or service, or as long as is set out in any relevant contract you have with the CNH Industrial Group or CNH Industrial's data retention schedule. If you wish to cancel your registration with any of CNH Industrial's websites, you may do so by following the "unsubscribe" instructions on the relevant website. If you change your profile to opt-out of receiving communications, your record may stay on the system so we can ensure that we do not contact you in the future.

Where you contribute to a CNH Industrial service or website, CNH Industrial will generally only keep your content for as long as is reasonably required for the purpose(s) for which it was submitted.

CNH Industrial takes reasonable steps to ensure that personal data or information is accurate, complete, current and reliable for its intended use.

### **What Personal Information CNH Industrial holds about me?**

You have the right to request a copy of your personal information held by CNH Industrial and, subject to certain limitations, to correct, amend, or delete that information where it is inaccurate or to have any inaccuracies corrected. If you have any requests or questions about this or any other question about this Privacy Policy please see "Contacting CNH Industrial" below.

### **Cross-border Personal Information transfers and the EU-US Privacy Shield**

The CNH Industrial Group is a global organization headquartered in the United Kingdom and has legal entities, business functions, and systems in countries around the world, including the United States.

We may share your personal information within the CNH Industrial Group and transfer it to countries in the world where we do business, including outside of the European Union and Switzerland. Other countries have privacy laws that are different from privacy laws in your country. Regardless of location, CNH Industrial handles personal information as described in this Privacy Policy.

CNH Industrial America LLC and its subsidiaries and Fiat Powertrain Technologies of North America, Inc., (the "CNH Industrial Group's U.S. subsidiaries") adhere to the EU-U.S. Privacy Shield Framework and the U.S.-Swiss Safe Harbor Framework regarding the collection, use, and retention of personal data, as described in this Policy, received from employees, suppliers, and customers located in the European Union member countries and Switzerland. CNH Industrial Group's U.S. subsidiaries will comply with the Privacy Shield Principles with respect to all personal data received from the European Union or the European Economic Area. To learn more about the Privacy Shield program, and to view the certification of the CNH Industrial Group's U.S. subsidiaries, please visit [www.privacyshield.gov](http://www.privacyshield.gov). The definitions, policies, and procedures described in CNH Industrial's Privacy Policy apply to personal data transferred pursuant to CNH Industrial's Privacy Shield certification. Those protections may meet, or exceed, what is required of



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the Privacy Shield Principles. What follows in this section of CNH Industrial's Privacy Policy is a description of how CNH Industrial's U.S. subsidiaries comply with the specific Privacy Shield principles not covered in other sections of this Privacy Policy. If there is any conflict between the policies covered in other sections of this Privacy Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern.

EU individuals have the right to limit the use and disclosure of their personal data as explained in the notices they receive at the point at which personal information is collected. CNH's Industrial's U.S. subsidiaries typically do not transfer non-HR personal information to third parties. If personal information is transferred to any third party, such third party will be required to provide at least the same level of privacy protection as is required by the Privacy Shield Principles, as well as agree to process personal information only for limited and specified purposes consistent with the consent of the data subject. To the extent provided by the Privacy Shield Principles, CNH Industrial Group's U.S. subsidiaries remain responsible and liable under the Privacy Shield Principles if the third-party agents that it engages processes personal information on its behalf in a manner inconsistent with the Privacy Shield Principles, unless CNH Industrial Group's U.S. subsidiaries are able to prove that they are not responsible for the event giving rise to the damage.

The CNH Industrial Group's U.S. subsidiaries will investigate and, within forty-five (45) days, attempt to resolve requests, complaints, and disputes regarding use and disclosure of your personal information in accordance with this Privacy Policy and through the contact information given below.

For any complaints that cannot be resolved, the CNH Industrial Group's U.S. subsidiaries will cooperate with applicable EU data protection authorities ("DPAs") and will comply with the information and guidance provided to them by a panel of DPAs. Please contact us at the information below for relevant DPA contact information. If we or the DPAs are unable to resolve your complaint, you may have the possibility to engage in binding arbitration through the Privacy Shield Panel.

The CNH Industrial Group's U.S. subsidiaries are subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission.

CNH Industrial Group's U.S. subsidiaries may be required to disclose personal information in response to lawful requests received from public authorities, including to meet national security or law enforcement requirements.

### **Changes to Privacy Policy**

From time to time, we may update this Privacy Policy to reflect new or different privacy practices. If we make any material changes to this Policy, we will place a notice on our homepage. We encourage you to periodically review this page for the latest information on our privacy practices.

### **Links to other sites**

Our websites may contain hyperlinks to websites owned and operated by third parties. These third party websites have their own privacy policies, including cookies, and we urge you to review them. They will govern the use of personal information that you submit or which is collected by cookies whilst visiting these websites. We do not accept any responsibility or

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liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

### **Contacting CNH Industrial**

If you have any questions or comments about this Privacy Policy please contact:

CNH Industrial N.V.  
Corporate Office: 25 St. James's Street  
Attn: Privacy Compliance  
London, SW1A 1HA  
United Kingdom  
[privacy-compliance@cnhind.com](mailto:privacy-compliance@cnhind.com)