



PRIVACY SHIELD
DATA PRIVACY POLICY

Chassix, Inc., its subsidiaries and its affiliates, respect the privacy of their customers, suppliers, employees and other persons with whom they deal in connection with their business operations. For this reason, Chassix and its affiliated U.S. entities (“US Holdings, Inc.”; “Chassix, Inc.”; “Diversified Machine, Inc.”; “Diversified Machine Bristol, LLC”; “Diversified Machine Montague, LLC”; “Diversified Machine Milwaukee, LLC”; “DMI Edon, LLC”; “Mexico Products I, LLC”; “DMI China Holding, LLC”; “Chassix Georgia Machining, LLC”; “DMI Columbus, LLC”; “Automotive Properties of New York, LLC”; “Concord International, Inc.”; “SMW Automotive, LLC”; “Automotive, LLC”; “Chassis Co. of Michigan, LLC”; “Alutech, LLC”; “Chassix Czech Holdco, LLC”) have adopted this Privacy Shield Data Privacy Policy in compliance with the Privacy Shield Principles published by the U.S. Department of Commerce (“Principles”) with respect to personal data transferred from the European Union (EU) to the United States of America. In addition, Chassix complies with the U.S. EU Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries. Chassix declares that it will adhere to the Privacy Shield Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement.

NOTICE

Chassix receives information from individuals in a variety of situations. For example, individuals may provide Chassix with personal data so they can (1) receive information regarding our products, (b) be considered for employment, promotions or reassignment within Chassix or (3) engage in business transactions with Chassix. We will use the information provided solely for the purposes for which it was collected.

CHOICE

Chassix does not share an individual’s personal information with any companies outside of the Chassix group of companies (which includes its subsidiaries and joint ventures throughout the world, hereinafter referred to as the “Chassix Group”) except as permitted by the Privacy Shield. Certain types of information (for example, resumes from individuals seeking employment) may be shared within the Chassix Group since we presume that individuals may be interested in any employment opportunities that may arise. Chassix will provide individuals the opportunity to choose (opt-out) whether their personal information can be used for purposes other than the purpose for which it was originally furnished.

With respect to “Sensitive Information” (i.e., information that reveals race, ethnic origin, political opinion, religious beliefs, union membership or that relates to health or sexual preferences) Chassix will not share such information unless specifically authorized by the individual to which the information pertains.

ONWARD TRANSFER

Chassix participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework. Chassix is committed to subjecting all personal data received from European Union (EU) member countries, in reliance on the Privacy Shield Framework, to the Framework’s applicable Principles.

Chassix is responsible for the processing of personal data it receives, under the Privacy Shield Framework, and subsequently transfers to a third party acting as an agent on its behalf. Chassix complies with the Privacy Shield Principles for all onward transfers of personal data from the EU, including the onward transfer liability provisions.

Prior to transferring personal information within the Chassix Group, or to third parties as permissible by the Privacy Shield, Chassix will confirm that such information will receive the safeguards provided by this Privacy Shield Policy. Chassix believes that adequate safeguards are in place if the recipient of the personal information is (1) bound by contract to provide the same level of protection as is offered by this Privacy Shield Policy; (2) bound by the Privacy Shield Principles; (3) subject to the European Directive; or (4) subject to another European Commission adequacy finding. If Chassix discovers that the recipient is not abiding by its privacy obligations, it will take commercially reasonable steps to prevent such breach.

With respect to personal data received or transferred pursuant to the Privacy Shield Framework, Chassix is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, Chassix may be required to disclose personal data in response to lawful requests by public authorities, including meeting national security or law enforcement requirements.

SECURITY

Chassix will take reasonable precautions to protect personal information from loss, misuse and unauthorized access, disclosure, alteration and destruction.

DATA INTEGRITY

Chassix will process personal information only in a way that is compatible with the purposes for which it was collected or subsequently authorized by the individual. Furthermore, Chassix will take reasonable steps to ensure that personal data is reliable for its intended use, accurate, complete and current.

ACCESS

Chassix will provide individuals with (1) reasonable access to personal information that it holds about them and (2) the reasonable ability to correct, amend, or delete that information where it is inaccurate or incomplete.

An individual who has any questions about this Privacy Shield Policy, or who wants access to his or her personal information should contact the Chassix Legal Department as indicated below:

Chassix Legal Department

300 Galleria Officentre, Suite 501

Southfield, MI 48034

(248) 728-8700

Iwona.Villaire@chassix.com

ENFORCEMENT

Chassix assures compliance with its Privacy Shield Policy by (1) conducting compliance audits not less than annually; (2) providing a dispute resolution procedure to individuals who feel their privacy rights have been violated; and (3) subjecting its employees who violate this Policy to discipline, up to and including, termination.

DISPUTE RESOLUTION

Any individual who has a question about this Policy, or who feels his or her privacy rights may have been violated, should contact the Chassix Legal Department identified above. Chassix will investigate and if necessary, try to resolve any dispute informally with the aggrieved individual. If the dispute cannot be resolved informally, Chassix has agreed to participate in the dispute resolution procedures of the panel established by the European data protection authorities to resolve disputes pursuant to the Privacy Shield Principles. Under certain conditions, more fully described on the Privacy Shield website (<https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint>), you may invoke binding arbitration when other dispute resolution procedures have been exhausted.