

PRIVACY POLICY:

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In accordance with the General Data Protection Regulation (GDPR) adopted on April 27, 2016, you have the right to be informed about how your personal data is used.

This policy aims to fulfill that right by providing clear and precise information about how NIDEC Leroy-Somer collects and uses your personal data.

Any changes to this policy will be published on the NIDEC Leroy-Somer website (<https://acim.nidec.com/fr-FR/motors/leroy-somer/About-Us/Leroy-Somer>). We recommend that you check it regularly.

DEFINITIONS:

“We” refers to all entities within the NIDEC Leroy-Somer group.

“Collect” refers to the gathering of personal data. This collection may be carried out, in particular, through questionnaires or online forms.

“Consent” refers to the individual’s agreement to the collection and use of their data. It must be freely given, specific, informed, and unambiguous.

“Personal Data” refers to any information relating to an identified or identifiable natural person who can be identified, directly or indirectly, in particular by means of an identifier, a name, an identification number, location data, an online identifier, or one or more specific elements relating to their physical, physiological, genetic, mental, economic, cultural, or social identity.

“Company” refers to any entity within the NIDEC Leroy-Somer group.

“Data Processing” refers to any use of data, such as recording, modification, storage, dissemination, extraction, use, communication, etc.

“Data Minimization” means that only data strictly necessary for the purposes for which it is processed should be collected.

“Data Controller” refers to the legal entity (company, municipality, etc.) or natural person who determines the purposes and means of processing. In this policy, the data controller is NIDEC Leroy-Somer.

“Processor” refers to the natural or legal person (company or public body) that processes data on our behalf as part of a service or provision.

“Third Party” refers to any person other than us and yourself.

“AI System”: An automated system designed to operate at various levels of autonomy, capable of generating predictions, recommendations, or decisions that influence physical or virtual environments.

When is your data collected?

Your personal data may be collected in the context of:

- Your visit to our website, particularly when you download our brochures, catalogs, manuals, software, and diagrams, or when using the Energy Savings Calculator.
- Managing our business relationship, notably when you place orders, schedule deliveries, request after-sales service, complete satisfaction surveys, or contact us via the contact form.
- Our prospecting activities, particularly during marketing operations and those of our subsidiaries, or when participating in trade shows, as well as when you subscribe to our newsletter.
- Your acquisition or use of our products and services.
- When opening our electronic communications, where you have consented to the use of tracking pixels that enable us to measure the performance of our email campaigns, improve our communications, and generate statistics regarding their consultation.

What data is collected?

NIDEC Leroy-Somer is committed to respecting data minimization by collecting only the data strictly necessary for the purpose of processing.

The purpose of processing corresponds to the main objective of collecting personal data. When we use your data, it is for a specific and legitimate purpose.

To find out which data is collected for each processing purpose, please refer to the table below.

What is the legal basis for collecting your data?

The legal basis is what legally authorizes the use of data. The General Data Protection Regulation (GDPR) provides six legal bases:

- The individual's consent.
- Performance of a contract.
- A legal obligation (when the implementation of processing is imposed on an organization by European or national regulations).
- Protection of vital interests.
- Public interest.
- The legitimate interests of the company.

To find out the legal basis for each processing purpose, please refer to the table below.

What are the data retention periods?

NIDEC Leroy-Somer is committed to retaining your personal data for a period that is proportionate to the purpose for which the data was collected (the intended purpose). We may need to keep your data for a longer period in order to comply with applicable legal and regulatory obligations.

To find out the retention periods for each processing purpose, please refer to the table below.

Who are the data recipients?

The data collected is intended for the various NIDEC Leroy-Somer departments involved in the processing. We ensure that only authorized persons have access to the information (access control systems).

1. NIDEC Leroy-Somer Group:

Your data may be subject to consolidation, pooling, or sharing (hereinafter “operations”) with all entities within the NIDEC Leroy-Somer group.

These operations are governed by contracts (standard contractual clauses, data processing agreements) between the different recipient entities to ensure the protection of your data and respect for your rights.

2. Third Parties:

Our service providers may also receive data in order to perform the services we have entrusted to them (e.g., hosting, sending postal or electronic mail, customer relationship management, maintenance, etc.).

Certain data may be transmitted to third parties to comply with legal, regulatory, or contractual obligations, or to legally authorized authorities.

We ensure that third parties and processors comply with data protection regulations.

To find out the recipients of the data for each processing purpose, please refer to the table below.

Table on the use of your data:

Purposes	Data	Data Subjects	Legal Bases	Retention Periods	Recipients
Management of the commercial relationship	First name, last name, email address, phone number	Customers, suppliers	Legitimate interest of the company in managing its commercial relationships	Data is retained for the duration of the commercial relationship	Sales department
Maintain and update our customer files	First name, last name, phone number, company, email address	Customers	Legitimate interest of the company in knowing its customers	Data is retained for the duration of the commercial relationship	Sales department
Provide our services, process your purchases and orders, products, services, and promotional offers	First name, last name, email address, phone number	Customers	Performance of the contract	Data is retained for the duration of the commercial relationship	Sales department
Deliver products and services	First name, last name, email address, phone number, delivery address	Customers	Performance of the contract	Data is retained for the duration of the commercial relationship and the period required by law	Transport department (including the carrier) and the sales department managing the order
Communicate with you regarding your orders,	First name, last name, email address, phone number	Customers	Legitimate interest of the company	Data is retained for the duration of the commercial	Sales department and marketing department

products, services, and promotional offers			in keeping you informed	relationship and the period required by law	
Offer tailored, personalized services, particularly as our products and services evolve	First name, last name, email address, phone number	Customers	Legitimate interest of the company in having products adapted to customer needs	Data is retained for the duration of the commercial relationship	- Marketing department - Experts answering customer questions - Sales department
Improve customer experience and knowledge	Website cookies with data on page visits and country of connection	Website users	Consent provided via the cookie banner	Please refer to the cookie banner	Marketing department
Perform data analysis to personalize innovative products or complementary/proportional offers	Website cookies with data on page visits and country of connection	Website users	Consent provided via the cookie banner	Please refer to the cookie banner	Marketing department
Prospecting and business development	First name, last name, phone number, email address, company	Prospects	Legitimate interest of the company in finding new clients	<u>When legislation allows opt-out in B2B (e.g., France):</u> Data is retained until the prospect objects to commercial solicitation. <u>When legislation requires opt-in even in B2B (e.g., Italy):</u>	Sales department and marketing department

				Data is retained until the prospect withdraws consent. Consent is renewed annually.	
Follow-up on the website contact form (“Contact Us”)	First name, last name, phone number, email address, company name, and the request submitted. Mandatory fields are marked with an asterisk.	Individuals contacting us via the “Contact Us” form	The company's legitimate interest in responding to enquiries.	Retention periods vary depending on the nature of your request	Requests are distributed to internal departments concerned by the request
Management of newsletter subscriptions	First name, last name, email address, company	Individuals who subscribed to the newsletter	Consent provided by ticking a checkbox. You can unsubscribe at any time.	Information is automatically deleted when the individual withdraws consent	Marketing department
Management of access to the company's premises	First name, last name, email address	Visitors	Legitimate interest of the company in ensuring site security	Data is deleted once the events are completed	Marketing department and Human Resources

What are the transfers of data outside the European Union?

The personal data you provide to us may, during various operations, be transferred to a country outside the European Union.

When this occurs, rules ensuring the protection and security of this information have been implemented, such as standard contractual clauses or data processing agreements.

The data flows outside the European Union that we carry out include:

- China and India, to group subsidiaries, for reporting and business analysis purposes.
- Group subsidiaries worldwide for After-Sales Service management, in order to identify the country closest to the customer and take the necessary actions to resolve the issue.
- Commercial agencies in the prospect's country for follow-up of contacts whose data is collected during trade shows.
- Group subsidiaries worldwide for prospects who have used the Energy Savings Calculator, in order to direct the request to the appropriate subsidiary.
- Japan, where the headquarters of NIDEC Corporation, the parent company, is located.
- United States, as we use American companies for prospecting activities and for hosting certain data.

The transfer of data to the United States is now authorized under the agreement called the **Data Privacy Framework**. The U.S. Department of Commerce has published a list of companies that comply with this agreement: <https://www.dataprivacyframework.gov/list>.

How do we use Artificial Intelligence in our services?

As part of the continuous improvement of our after-sales service and claims management, we use Artificial Intelligence (AI) technologies to facilitate and speed up the processing of customer requests.

These AI systems enable, in particular:

- **After-Sales Service:** querying our internal documentation database to provide faster and more accurate responses to user inquiries about our products.
- **Claims Management:** analyzing email content to qualify requests and route them to the appropriate contact.

The use of AI is strictly regulated and complies with principles of confidentiality, security, and conformity with the GDPR and the AI Act. All interactions are recorded for traceability and historical purposes. Data processed by these systems is neither shared with third parties nor used for purposes other than those intended for customer service and claims management.

Processing carried out by AI does not result in any automated decision-making that has legal or significant effects on the individuals concerned. Human oversight is systematically exercised to validate responses and actions, ensuring their relevance and compliance.

What security measures are in place?

NIDEC Leroy-Somer has implemented technical and organizational measures to ensure the security, integrity, availability, and confidentiality of personal data.

We have adopted policies, internal processes, and implemented technical and organizational measures that comply with the principles of “Privacy by Design” and “Privacy by Default” when developing, designing, selecting, and using applications, services, and products that involve the processing of personal data. We take data protection rights into account from the design stage onward.

What are your rights?

In accordance with the provisions of the General Data Protection Regulation (GDPR), you have several rights regarding your data:

1) Right to information (*Article 12 GDPR*):

This right allows you to be informed in advance about how your data is processed. NIDEC Leroy-Somer undertakes to provide you with a clear and transparent explanation, including:

- The reasons for using your data (purposes).
- The legal basis for processing.
- The individuals concerned by the processing.
- The recipients of the data or categories of recipients to whom personal data has been or will be disclosed, particularly recipients established in third countries.
- Where possible, the intended retention period for personal data or, where not possible, the criteria used to determine this period.
- The various rights of individuals concerned by the processing.
- The right to lodge a complaint with the supervisory authority (CNIL).

2) Right of access (*Article 15 GDPR*):

This right allows you to know what data we hold about you. Its purpose is to verify the accuracy of the data and, if necessary, have it corrected or deleted.

The company may refuse your request when:

- Certain files are governed by law.
- The company considers your request to be excessive or unfounded. The company must justify this “excessive” or “unfounded” nature.
- The documents contain data concerning third parties.

3) Right to rectification (Article 16 GDPR):

This right allows you to correct inaccurate data.

4) Right to erasure (Article 17 GDPR):

This right allows you to request the deletion of your data.

The company may refuse your request when it conflicts with:

- The exercise of the right to freedom of expression and information.
- Compliance with a legal obligation requiring us to process your data.
- The use of your data for reasons of public interest.
- The establishment, exercise, or defense of legal claims.

5) Right to data portability (Article 20 GDPR):

This right allows you to retrieve part of your data in a machine-readable format so that it can be transferred to other platforms.

However, it must not infringe upon the rights and freedoms of third parties.

6) Right to object (Article 21 GDPR):

This right allows you to object to the collection of your data.

NIDEC Leroy-Somer may refuse the request if:

- There are legitimate and compelling reasons to process the data, or the data is necessary for the establishment, exercise, or defense of legal claims.
- You have consented to the use of your data—in this case, you must withdraw your consent rather than exercise the right to object.
- A contract binds you to us.
- A legal obligation requires us to process your data.
- The processing is necessary to safeguard the vital interests of the data subject or another natural person.

7) Right to restriction of processing (Article 18 GDPR):

This right allows you to temporarily freeze your data. It applies when you have made a request for rectification or an objection. During the processing of your requests, your data cannot be used.

When your data is frozen, it may only be used in the following cases:

- When you have given your consent.
- For the establishment, exercise, or defense of legal claims.
- For the protection of the rights of another natural or legal person.
- Or for important reasons of public interest of the Union or a Member State.

Identity and Contact Details of the Data Controller:

You can exercise your rights or ask any questions about your data by emailing: InformatiqueetLibertes.IALS@mail.nidec.com or by sending a letter to the following postal address:

Boulevard Marcellin Leroy - CS 10015 - 16915 ANGOULÊME Cedex 9 France.

A copy of your ID may be requested if there is doubt about your identity.

You also have the right to lodge a complaint with the Commission Nationale de l'Informatique et des Libertés (CNIL).