

Privacy Statement

Modine Manufacturing Company ("Modine") is a global company with its headquarters in Racine, Wisconsin, USA. Modine has many subsidiary and affiliate companies located in many different countries. This statement applies to Modine and its subsidiaries and affiliates that may obtain and process Personal Data (as defined below). You can find details about Modine and its relevant subsidiaries and affiliates in the table below. The Modine entity with which you engage (e.g. by visiting a website, contacting and engaging with us) will be responsible for your Personal Data (i.e. the controller under applicable data protection laws).

This Privacy Statement applies in particular to visitors of this website, www.modine.com, which is owned and operated by Modine Manufacturing Company, as well as to all affiliated websites which may be operated by our group companies, unless otherwise indicated on those sites. These sites currently include: www.modinehvac.com, www.modinecoils.com, www.airedale.com, www.barkell.co.uk, www.airedaleusa.com, www.modineselect.com, www.modinecoatings.com, www.modinegulfcoat.com, www.heatcrafthtd.com, <https://modineinnovationtour.com> and <https://modinehvac.blog> (altogether the above-mentioned websites are "the Site/s").

At Modine, we recognize the importance of privacy to you and are firmly committed to protecting your privacy when you visit the Site and provide information to us in the course of a business relationship. As a result, we have instituted this Privacy Statement ("Privacy Statement"). Modine is providing this Privacy Statement to explain how we collect, use, disclose and protect the information you submit to us when accessing and using the Site or otherwise engage with us, e.g. as a customer, supplier, prospect or other partner.

As used in this Privacy Statement, "we," "our" and "us" means Modine and its affiliates.

Modine's Code of Conduct, as well as its Global Data Protection Policy, may be found at <http://www.modine.com/web/en/policies.htm#>.

TABLE OF CONTENTS

a) The Meaning of Personal Data	1
b) Important Notice about International Transfers	2
c) The categories of Personal Data we may collect, the purpose and the lawful basis	2
d) For California Residents	3
e) Keeping you informed, direct marketing and business development	5
f) Cookies	5
g) Google Analytics	5
h) Do Not Track	6
i) Disclosure of your Personal Data to third parties	6
j) Security of Personal Data	6
k) Retention period or criteria used to determine the retention period	6
l) Your rights under data privacy laws	7
m) Children	7
n) Links to Other Websites	8
o) Updates and changes to this Privacy Statement	8
p) Contact Us	8

The meaning of Personal Data

"Personal Data" is defined in data protection laws applicable in your country and may identified by other titles, such as "Personal Information" (in California, USA). It includes any information relating to an identified or identifiable natural person. This means any individual who can be identified directly or indirectly by reference to an identifier such as name, identification number, location data, online identifiers, (for example, IP addresses – if they can be used to identify you), or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Put simply, this includes data which either by itself or with other data held by us or available to us, can be used to identify you.

In general, you may visit the Site and view its content while remaining anonymous by not providing any Personal Data. If you do not agree with this Privacy Statement, please do not provide us any information and do not use the Site.

Important notice about international transfers

Due to the global nature of our business and considering that Modine is a global company with teams working around the globe with global or multi-country roles, your Personal Data will be stored and transferred to parties located in other countries, including outside the European Economic Area. These other countries will either have different data protection laws than your country of residence or they will not have data protection laws. They might not be deemed by the European Commission as providing adequate protection for Personal Data.

In particular, we store your Personal Data on servers in the United States of America. The United States is not deemed by the European Commission to have adequate protections for Personal Data. Steps will be taken to put in place safeguards (including around security) to protect your Personal Data when it is in these other countries. This may include the use of European Model Clause contracts, where required under applicable law. You can find out what these are online at: http://ec.europa.eu/justice/data-protection/international-transfers/transfer/index_en.html. If you have any questions or wish to be provided with a copy, please contact us (details below). Please note commercially sensitive information may be removed/blanked out from copies supplied to you.

The categories of Personal Data we may collect, the purpose and the lawful basis

Personal Data collected from you include the following:

Categories of Personal Data	Purpose	Lawful basis
Application data (e.g. name, CV)	Processing of this Personal Data is required to enable Modine to administer the recruiting process, including the set-up of an electronic job applicant HR file, managing your application, organizing interviews.	Processing is necessary for us to entering into a contract with you.
Contact information (e.g. full name, postal address, e-mail address, employer/business and professional information, job titles, telephone and fax numbers)	Managing and responding to your queries. Management and execution of pre-contractual obligations or request of information. Registering for and managing a warranty and related claims.	Performance of contract and legitimate interests - it's important that we can respond to your inquiries.
Contact information (e.g. full name, postal address, e-mail address, employer/business and professional information, job titles, telephone and fax numbers)	Customer and Technical Support: Modine uses email and customer relationship software as an avenue through which to provide customer service and technical support. We may contact the customer using Personal Data in an attempt to resolve an issue. We may also use Personal Data to proactively notify customers of technical issues which may affect them.	Performance of contract
Contact information (e.g. full name, postal address, e-mail address, employer/business and professional information, job titles, telephone and fax numbers); business information (e.g. fiscal and tax data; bank accounts, etc.)	Transactions: Modine processes Personal Data, including contact and billing information collected from individuals who wish to conduct a transaction (e.g. via email order). Information collected for transactions may include a payment card number and security code, although Modine does not store such data. Modine uses this Personal Data information to check purchasers' qualifications and verify their identity, as well as for billing and shipping purposes, to provide the services and/or products the purchasers have requested	Performance of contract
Browsing information (IP address,	Monitoring and producing	Legitimate interests - we need to

browser information)	statistical information regarding the use of our platforms, and analyzing and improving their functionality.	perform limited routine monitoring to make sure our website works properly, to diagnose any problems with our server and administer our Site.
All information	<p>Establishing and enforcing our legal rights and obligations and monitoring to identify and record fraudulent activity.</p> <p>Complying with instructions from law enforcement agencies, any court or otherwise as required by law.</p> <p>Respond to any reported ethics or compliance matter.</p> <p>Maintaining general record-keeping and customer relationship management.</p> <p>Managing the proposed sale, restructuring or merging of any or all part(s) of our business, including to respond to queries from the prospective buyer or merging organization.</p> <p>Resolving any complaints from, or disputes with you.</p>	Legitimate interest (see column on left)

In summary, we need certain categories of Personal Data in order to administer any contract with you (where relevant). Certain other Personal Data is processed for our legitimate interests in cases where this does not result in prejudice to you. Please note that if the Personal Data we collect from you is necessary to entering into a contract with you, or to manage the business relationship with you or to fulfill a mandatory requirement, the failure to provide such data may not enable us to put in place the aforementioned related process.

For California Residents

The personal data (or personal information) that we collect includes information within the below categories of data. These categories also represent the categories of personal information that we have collected over the past 12 months. **Note that the categories listed below are defined by California state law. Inclusion of a category in the list below indicates only that, depending on the services and products we provide you, we may collect some information within that category.** It does not necessarily mean that we collect all information listed in a particular category for all of our customers.

We do not sell personal information about you, as defined under California state law, nor do we intend to do so. We also have not done so for the last 12 months. In addition, we do not share personal data with third parties for their direct marketing purposes.

Category	Source	Purpose of Collecting Information	Disclosed for a business purpose in last 12 months?	Types of Third Parties Shared With
<p><u>Personal Identifiers:</u></p> <p>Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier Internet Protocol address, email</p>	A subset of this information is collected directly from you, our service providers or through the use	A subset of this data is processed in connection with a number of our operational functions, including to process payments, verify purchasers and ship orders, to provide notices about your account, to	Yes	Affiliates and service providers

address, account name, social security number, driver's license number, passport number, or other similar identifiers.	of cookies and similar technologies.	audit our interactions, and to respond to your queries, or to take steps necessary to enter into a contract with you. It may also be used for warranty purposes, and for marketing purposes, including offering you products that may interest you.		
<u>Information about you:</u> Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, your name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.	A <u>subset</u> of this information is collected directly from you, from our service providers or through the use of cookies and similar technologies.	A <u>subset</u> of this data is processed in connection with a number of our operational functions, including to process payments, verify purchasers and ship orders, to provide notices about your account, to audit our interactions, and to respond to your queries, or to take steps necessary to enter into a contract with you. It may also be used for warranty purposes, and for marketing purposes, including offering you products that may interest you.	Yes	Affiliates and service providers
<u>Commercial information:</u> Information including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	This information is collected directly from you or our service providers	This data is processed in connection with a number of our operational functions, including to verify purchasers and ship orders, to provide notices about your account, to audit our interactions, and to respond to your queries, or to take steps necessary to enter into a contract with you.	Yes	Affiliates and service providers
<u>Usage Information:</u> Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.	This information is collected directly from you, our service providers, or through the use of cookies and similar technologies.	A <u>subset</u> of this data is collected and processed in connection with a number of our operational functions, including to optimize performance of our websites, provide products and services, and to audit our interactions. It is also processed to detect security incidents, protect against malicious, deceptive, fraudulent or illegal activity, and for data analytics.	Yes	Affiliates and service providers
<u>Recordings:</u> Audio, electronic, visual, thermal, olfactory, or similar	A <u>subset</u> of this information is collected directly from	A subset of this data is processed in connection with a number of our operational functions, including recording	Yes	Affiliates and service

information.	you or our customers.	sales calls and other calls.		providers
<u>Professional or employment-related information.</u>	This information is collected directly from you or our service providers (including recruiting agencies).	This data is processed in connection with a number of our operational functions, including setting up an electronic job applicant HR file, managing your application, and organizing interviews.	Yes	Affiliates and service providers

Keeping you informed, direct marketing and business development

Our lawful basis for processing Personal Data under Article 6 of the General Data Protection Regulation (GDPR) varies according to circumstances: it may be contractual, consensual or on the basis of legitimate interest. Where relevant some of our business units will keep your name, address and contact details (including telephone numbers and email addresses) in our databases and may, from time to time, use that information to make you aware of our own related products and services as well as updates on developments in our industry sector generally which may be of interest to you. Where legitimate interest is the basis for processing Personal Data, our sole purpose is to raise awareness of products and services that may benefit professionals involved in the sectors our business units operate in. We may contact you in writing, by telephone, fax or email for this. If at any time you decide that you do not want your contact details used for these purposes, please tell us (see “**Contact us**” below).

Cookies

We use cookies on our Site. Cookies are small text files that your web browser leaves on your hard drive to recognize you as a repeat user of our Site and track your use of our Site. This allows for personalization of certain aspects of your visit to our Site. The following cookies are used:

- **Essential Cookies (Functional/Strictly necessary):** These cookies are essential to the functioning of Modine's websites and are automatically activated when visiting our websites. The visitor's consent preference is stored in a cookie for future visits (Opt-in / Opt-out Cookie)
- **Performance Cookies (Marketing):** The use of these cookies enables us to optimize our websites performance and content. This offers visitors an optimal user-experience.
- **Online Behavioral Cookies (Marketing/Interest):** These cookies are used for customer profiling purposes. Online engagement software uses this information to generate visitor profiles so these visitors can be offered personalized relevant information tailored to their interest.

You can disable cookies using your Internet browser settings. Please consult your browser's help function for information on how to disable cookies. Note that if you disable cookies, certain features of our Site may not function properly.

Google Analytics

With your consent, we use Google Analytics, a web analysis service of the Google Inc. (“Google”). Google uses Cookies that are transferred to and being saved on their servers located in the United States of America. In case of activating the IP-anonymization on this out website, your IP address is being shortened within the EU/EEA. Only in exceptional cases will your entire IP address be sent to the servers in the USA and will be shortened there. On our behalf, Google will use this information to evaluate your usage of our website, to assemble reports on the website activity and to execute further related services.

The IP address that is transferred from your browser to Google will not be merged with other data of Google.

As we have pointed out for the regular cookies, you can disable cookies using your Internet browser settings. Please consult your browser's help function for information on how to disable cookies. Note that if you disable cookies, certain features of our Site may not function properly. For this purpose, you may also use and install a plug-in that is provided by Google: <https://tools.google.com/dlpage/gaoptout?hl=en>

We use Google Analytics with the extension „_anonymizeIp()“. In that result, only shortened IP addresses are being processed to prevent the affiliation to people. Therefore, personalized data will be deleted immediately.

We use Google Analytics to analyze and improve our website. With the gathered statistics, we can improve our services for you. For the exceptional cases, where personal data is being transferred to the USA, Google has accepted the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>. Legal basis for the processing of your data is your consent under Art. 6 (1) lit. a GDPR.

Information about the third-party provider: Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001. Terms and Conditions: <https://marketingplatform.google.com/about/analytics/terms/gb/>, Overview of data privacy at Google: https://privacy.google.com/businesses/compliance/#!?modal_active=none, Privacy Policy: <https://policies.google.com/privacy?hl=en-US>.

Do Not Track

Some web browsers permit you to broadcast a signal to websites and online services indicating a preference that they “do not track” your online activities. At this time, we do not honor such signals and we do not modify what information we collect or how we use that information based upon whether such a signal is broadcast or received by us.

Disclosure of your Personal Data to third parties

We may disclose your Personal Data to third parties, including but not limited to as follows:

1. Within our group of companies for the purposes of use described in this Privacy Statement;
2. To third parties who supply services to us and who help us and our group of companies to operate our business. For example, sometimes a third party may have access to your Personal Data in order to support our information technology or to handle mailings on our behalf;
3. To our legal and other professional advisers;
4. As necessary in order to comply with a legal requirement (including, where appropriate, any imposed on our group companies in the United States), for the administration of justice, to protect vital interests, to protect the security or integrity of our databases or this Site, to take precautions against legal liability;
5. To regulatory authorities, courts and governmental agencies to comply with legal orders, legal or regulatory requirements and government requests; and
6. Modine may engage third parties to manage the Site and provide other services in connection with the Site, such as the collection and analysis of data. Such third parties may have access to certain personal information you provide as necessary for the provision of such services on behalf of Modine; provided, however, all such third parties shall be required to protect such personal information in accordance with this Privacy Statement.

Security of Personal Data

We endeavor to maintain security measures designed to protect Personal Data which is transmitted, stored or otherwise processed by us, from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access, in connection with our Site. These measures include computer safeguards and secured files and facilities. Our service providers are also selected carefully and required to use appropriate protective measures. In certain areas, Modine uses industry-standard SSL-encryption to protect data transmissions. Most current browsers support the level of security needed to use these areas.

In particular, we endeavor to maintain measures to ensure a level of security appropriate to the risk, including as appropriate: (a) pseudonymization (such as where data is separated from direct identifiers so that linkage to an identity is not possible without additional information that is held separately) and encryption, (b) ensuring the ongoing confidentiality, integrity, availability and resilience of systems and services used to process your Personal Data, (c) ensuring 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 (d) ensuring a process for regularly testing, assessing and evaluating the effectiveness of technical and organizational security measures.

Retention period or criteria used to determine the retention period

We keep your Personal Data for as long as it is necessary to do so to fulfill the purposes for which it was collected as described above.

The criteria we use to determine data retention periods for Personal Data includes the following: (i) **Retention in case of queries.** We will retain it for a reasonable period after the relationship between us has ceased (up to 6 months) in case of queries from you; (ii) **Retention in case of claims.** We will retain it for the period in which you might legally bring claims against us if and to the extent we have entered into any contract with you; (iii) **Retention in accordance with legal and regulatory requirements.** We will consider whether we need to retain it after the period described in (ii) because of a legal or regulatory requirement.

If your application for employment is successful and you commence employment with Modine, your Personal Data will be transferred to your personnel file and will be processed for employment purposes. If your application for employment is not successful, we will keep your Personal Data for a period of 6 months upon notification that your application was not successful.

If you would like further information about our data retention practices, please contact us (see “**Contact Us**” below).

Your rights under data privacy laws

You have various rights under data privacy laws in your country. These may include (as relevant): the right to request access to the Personal Data we hold about you; the right to rectification including the requirement for us to correct inaccurate Personal Data; the right to request restriction of processing Personal Data concerning you, or to object to processing of your Personal Data, the right to request the erasure of your Personal Data where it is no longer necessary for us to retain it; the right to data portability including to obtain Personal Data in a commonly used machine readable format in certain circumstances such as where our processing of it is based on a consent; the right to object to automated decision making including profiling (if any) that has a legal or significant effect on you as an individual; and the right to withdraw your consent to any processing for which you have previously given that consent. You can also lodge a complaint with a supervisory authority.

Please see “**Contact Us**” if you wish to exercise any of these rights (as relevant).

Please note that under California law, we are only obligated to respond to personal information requests from the same consumer up to two times in a 12-month period. Under EU law, if an individual makes unfounded, repetitive, or excessive requests (as determined in our reasonable discretion) to access Personal Data, a controller may charge a fee subject to a maximum set by law.

Before providing information you request in accordance with these rights, we must be able to verify your identity. In order to verify your identity, you may need to submit information about yourself, including, to the extent applicable, providing answers to security questions, your name, government identification number, date of birth, contact information, or other personal identifying information. We will match this information against information we have previously collected about you to verify your identity and your request. If we are unable to verify your identity as part of your request, we will not be able to satisfy your request. We are not obligated to collect additional information in order to enable you to verify your identity. For deletion requests, you will be required to submit a verifiable request for deletion and then to confirm separately that you want personal information about you deleted.

If you would like to appoint an authorized agent to make a request on your behalf, you must provide the agent with written, signed permission to submit privacy right requests on your behalf, or provide a letter from your attorney. The agent or attorney must provide this authorization at the time of request.

Information collected for purposes of verifying your request will only be used for verification.

If you chose to exercise any of these rights, to the extent that they apply, U.S. state law prohibits us from discriminating against you on the basis of choosing to exercise your privacy rights. We may, however, charge a different rate or provide a different level of service to the extent permitted by law.

Children

Our Website is not intended for children under 17 years of age. No one under age 17 may provide any information to the Website. We do not knowingly collect Personal Data from children under 17. If you are under 17, do not use or provide any information on our Website or on or through any of its features/register on the Website, make any purchases through the Website, use any of the interactive or public comment features of our Website or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received Personal Data from a child under 17 without verification of parental consent, we will delete that information. If you believe we might have any

information from a child under 17, please contact us in any manner set forth below in the “[Contact Us](#)” Section of this Privacy Policy.

Links to Other Websites

This Site may contain hyperlinks to websites that are not operated by us. These hyperlinks are provided for your reference and convenience only and do not imply any endorsement of the activities of these third-party websites or any association with their operators. We do not control these websites and are not responsible for their data or privacy practices. We urge you to review any privacy policy/statement posted on any site you visit before using the site or providing any Personal Data.

Updates and changes to this Privacy Statement

We may decide to change this Privacy Statement. Such a change may be fundamental or may significantly affect you. We encourage you to review the content of this Privacy Statement regularly. The date of the last update is indicated at the bottom of this Privacy Statement.

Contact Us

If you wish to exercise your data protection rights, you may submit a request via our website, or you may contact Modine in the following ways:

Modine Company and Controller	Contact Details
Airedale International Air Conditioning Ltd	Airedale International Air Conditioning Ltd. Leed’s Road LS19 6JY Leeds United Kingdom Attention: Director Human Resources privacycontact@eu.modine.com
Barkell Limited	Unit 22, No.1 Industrial Estate Consett, County Durham DH8 6SZ United Kingdom Attention: Director Human Resources privacycontact@eu.modine.com
Modine Europe GmbH	Modine Europe GmbH Arthur B. Modine Strasse 1 D-70794 Filderstadt Germany Attention: Director Human Resources and EHS – Europe Datenschutzbeauftragter-DE@eu.modine.com
Modine Austrai GmbH	Modine Austria GmbH Arthur B. Modine Strabe 1-3 A-2542 Kottlingbrunn Austria Attention: Director Human Resources and EHS – Europe privacycontact@eu.modine.com1
Modine Pliezhausen GmbH	Modine Pliezhausen GmbH Daimlerstrasse 3 D-72124 Pliezhausen Germany Attention: Director Human Resources and EHS – Europe Datenschutzbeauftragter-DE@eu.modine.com

Modine Neuenkirchen GmbH	<p>Modine Neuenkirchen GmbH Burgsteinfurter Camm 92-98 D-48485 NeuenKirchen Germany Attention: Director Human Resources and EHS – Europe Datenschutzbeauftragter-DE@eu.modine.com</p>
Modine Hungaria Gep.K.f.t.	<p>Modine Hungaria K.f.t. Lovoi uit 35 HU-3400 Mezokovesd Hungary Attention: Director Human Resources and EHS – Europe privacycontact@eu.modine.com</p>
Modine Pontevico S.r.l.	<p>Modine Pontevico S.r.l. Viale Europa 1 I-25026 Pontevico Italy Attention: Director Human Resources EMEA privacycontact@eu.modine.com</p>
Modine CIS Italy S.r.l.	<p>Modine CIS Italy S.r.l. Via Giulio Locatelli 22 33050 Pocenia (UD), Italy Attention: Director Human Resources EMEA privacycontact@eu.modine.com</p>
Modine CIS Guadalajara SAU	<p>Modine CIS Guadalajara SAU Cristobal Colon, Parcela 309 Pol. Industrial del Henares Guadalajara 1900 Castilla La Manchatel Espana Attention: Director Human Resources EMEA privacycontact@eu.modine.com</p>
Modine Söderköping AB	<p>Modine Söderköping AB Industrgatan 2 SE-61481 Söderköping Sweden Attention: Director Human Resources EMEA privacycontact@eu.modine.com</p>
Modine Uden B.V.	<p>Modine Uden B.V. Kuiperstraat 2 NL-5405 BB Uden The Netherlands Attention: Director Human Resources and EHS – Europe privacycontact@eu.modine.com</p>
Modine SRB d.o.o. Sremska Mitrovica	<p>Modine SRB d.o.o. Sremska Mitrovica Rumski drum 1 2200 Sremska Mitrovica Serbia Attention: Director Human Resources EMEA privacycontact@eu.modine.com</p>
Modine Manufacturing Company	<p>Modine Manufacturing Company 1500 DeKoven Avenue Racine, WI 53403 United States of America Attention: Director Human Resources Americas privacycontact@na.modine.com</p>

Other ways of contacting us:

1-833-471-0004 (Toll-Free Number)

Or

SAR@modine.com

Our Helpline (which is available 24 hours/365 days/year via the internet or telephone (as instructed on this website)):

<http://www.modine.com/web/en/ethics-programreporting.htm#>

Be sure to include your email address and telephone number with your correspondence.

Last updated: December 2019