

PRIVACY POLICY

QR CODE INTERACTIVE MENU

This privacy policy applies to the QR code Interactive Menu located in Adobe Experience Manager and tracked in Google Analytics and in TESA 360– provided by Federal-Mogul Global Aftermarket BV (“DRiV” or “Federal-Mogul”).

DRiV may engage one or more third-party technology suppliers as data processors or sub-processors to support the technical operation of the QR Code Menu.

When you use the QR code menu, your personal data (hereinafter referred to as "data") is processed. The data may include, for example, Your name, address, e-mail address and other personal details.

This Privacy Policy explains how and why such data is processed in accordance with the GDPR and applicable data-protection laws.

Purposes and legal basis of our data processing

1. Information we collect:

Depending on how the QR Code Menu is used, DRiV may process the following categories of Personal Data:

- Usage and interaction data such as date and time of access, menu interactions and technical status information;
- Device and connection data, such as browser type, operating system and IP-based location, and language settings;
- Contact data such as email address or telephone number;
- Content voluntarily provided by the User, such as messages or images submitted when reporting an issue or requesting support.

The above gives us information on the general interests and preferences of our visitors. The data is not person-related, but only of a general, statistical nature. We are therefore unable to determine which users have called up what data. DRiV does not seek to identify Users by name unless the User voluntarily provides identifying information (e.g. when contacting customer support).

The above listed data will be processed for the following purposes:

- To provide and maintain our QR code program, including to monitor the usage of the QR code program.
- For the performance of a contract: the development, compliance and undertaking of the purchase contract for the products, items or services you have purchased or of any other contract with DRiV through the Service.
- To manage Users requests: To attend and manage Users requests to DRiV.
- For other purposes: DRiV may use User’s information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional

campaigns and to evaluate and improve our Service, products, services, marketing and User's experience.

DRiV processes your data only for the purposes stated unless User has expressly given us his consent for any other purposes. Where processing is based on consent, Users may withdraw their consent at any time with effect for the future.

The legal basis for the processing of the data is Art. 6 (1) s. 1 b) GDPR and Art. 6 (1) s. 1 f) GDPR.

2. Contact and Support functions

When Users contact DRiV via the QR Code Menu (by email or contact form), the transmitted personal data, in particular the e-mail address itself, is stored and processed exclusively for the purpose of handling the request. Use of personal data: We do not transfer, sell or rent the user's personal data collected to any third parties, except as expressly described below.

DRiV may share Data with carefully selected service providers who process data on DRiV's behalf, solely to the extent necessary to process and respond to the request.

Such service providers receive only the Data necessary to perform their services and are prohibited from processing the data for their own purposes.

3. Device information

Use of certain features of the QR Code Menu may require access to device functions, such as

- Device attributes: Information such as the operating system, hardware and software versions, browser type,
- Data from device settings: Information that you allow us to obtain through the device settings you have enabled, such as access to your GPS location and camera;
- Network and connections: Information such as the name of your mobile or internet service provider, language, time zone, IP address.

The legitimate interest in processing the data lies in the best possible optimization of our products for the specific user. Deviating from this, the consent of the user to the individual features is the basis for the processing activities.

4. Location-based information

We use location-based information - such as your current location, to give you access to the list of our warranty conditions depending on the country the User is located. Location-based information may be based on things like exact device location (if you have allowed us to collect it) and IP addresses. The user must consent to the feature in advance.

5. Camera

If you want to be able to open the QR code Menu, we need you to open your camera on your smartphone and scan the QR code on the packaging. The users decide this action when choosing to scan a code. The menu will not work without using the camera on your mobile.

6. IT security

Finally, we also process data in your and our interest to ensure the integrity, confidentiality and availability of the data processing systems, i.e. in particular the security and availability of your data in the interactive QR code menu. It is not possible to use our QR code menu without processing data for this purpose. The legitimate interest is the maintenance and secure provision of our services.

Data transfer beyond the borders of the EU

The data we collect is stored exclusively on servers in the European Union. Data will not be transferred to companies outside the European Union without your express consent. The data are not transferred to third countries or international organizations

This also applies to service providers commissioned by us for data processing.

Data recipient

Based on our contract with you or based on your consent, we will only transmit your data via a secure connection to the recipients selected by you or receive it from them.

To enable us to offer you all the functions in the QR code menu, we may also use selected service providers who process data on our behalf and in our name. We only pass on data to service providers carefully selected by us and commissioned in writing within the framework of legally permissible order processing. These only receive the data that is necessary for the fulfilment of the order.

This includes the following categories of contractors: software developers, server hostess, newsletter senders, customer support, web analytics service.

Duration of data storage

We generally delete personal data if there is no need for further storage. A requirement can exist in particular if the data is still required to fulfil contractual services, to check warranty and, if applicable, guarantee claims and to be able to grant or defend them. Where statutory retention obligations apply, Data is retained for the legally required period and deleted thereafter.

Use of cookies

Cookies are small text files which may be stored on the hard drive of a visitor to a website. The information contained in the cookies facilitates the navigation of the website and enables you to have personal settings on the website. For these reasons, we currently use cookies on our site. They have a time limit. Naturally, you can prevent the cookies being saved on your hard drive by changing your browser settings. You can find out how to do this for your browser in the user instructions of your browser manufacturer.

Data security

DRiV and its processors implement appropriate technical and organisational measures to protect Personal Data against unauthorised access, loss, or alteration, in accordance with applicable legal requirements.

Your rights and complaint options

If your data is processed, you are a data subject within the meaning of GDPR and you have the following rights:

- Right to information: you have the right to receive information from the controller about your stored personal data. You can assert this right of access at any time and free of charge.
- Right to rectification or erasure: You have the right to request the controller to rectify or complete your personal data without delay. Furthermore, you may have the right to request the erasure of your personal data from the controller.
- Right to restriction of processing: You may have the right to request the controller to restrict the processing of your personal data.
- Right to withdraw your consent: You may withdraw any consent you have given for the processing of your personal data by the controller at any time.
- Right to object to processing: You may object to the processing of your personal data at any time on grounds relating to your particular situation. Your data will then no longer be processed.
- Right to data portability: You have the right to receive provided personal data in a structured, common and machine-readable format. Furthermore, you can request the transfer of your personal data to another controller.

You can exercise all of these rights by contacting us at support@gurusoncall.tech

You also have the right to complain to a data protection supervisory authority about our processing of your personal data.

Responsible party

The responsible party for data processing within the meaning of data protection law is:

Company: Federal-Mogul Aftermarket EMEA BV – A Tenneco Group company Address: Prins Boudewijnlaan 5 - 2550 Kontich, Belgium Telephone: +32 3 450 83 10

E-mail: info@driv.com

Changes to the Privacy Policy

DRiV reserves the right to revise or amend the Privacy Policy from time to time at its discretion. The user shall be responsible for regularly checking the QR code menu homepage for an updated Privacy Policy which becomes effective once it has been drawn up. By continuing to use the QR Code menu the user agrees to the revised or amended Privacy Policy.