



**VIRGINIA - GEORGIA TRANSFORMER**  
**ONE SOURCE-ONE COMMITMENT**

Virginia Transformer Corporation  
220 Glade View Drive Roanoke, VA 24012

# Privacy and Cookie Notice

## 1. Introduction

This Privacy and Cookie Notice ("**Notice**") applies to the Virginia Transformer Corp of companies, which means each entity in which VTC, directly or indirectly, has a majority holding or owns or controls the majority of voting rights. VTC is responsible for the processing of your personal data and other information related to you (such as cookies) and controls how it is used, in accordance with this Notice.

At VTC, respecting your data protection rights is a top priority. This Notice explains how we use personal data and other information about you, how we process such data, and what rights you have regarding your personal data.

## 2. Who is responsible for the processing of your personal data?

Virginia Transformer Corp. and its subsidiary companies are responsible for your personal data. For applicable privacy and data protection laws, the primary controller of your data is VTC which is communicating with you. Other subsidiary companies of VTC may also receive and process your personal data, either in the capacity of controller or processor and this Notice applies equally to them.

## 3. The types of information we collect and use?

VTC collects and uses personal data that concerns you in connection with the use of our products. VTC may collect the following categories of personal data and other information related to you (such as cookies):

- **Identification data and business contact information, you share with us** such as first name, last name, job/position/title, business email address, business address, telephone number, mobile telephone number, telefax number, private telephone number, gender, date of birth, login credentials.
- **Additional information you provide to us in the course of your use of the platform, register for an account and providing the service requested** such as interests in our products, subscription preferences, personal preferences, profile information (cv), posts on digital channels, comments, opinions, images and videos, credit card and other payment information.
- **Electronic identification data and information collected by the communications systems, IT applications and website browser** such as information technology usage (system access, IT and

internet usage), device identifier (mobile device ID, IP address, browser type, browser settings, time and URL accessed, cookies), registration and login credentials, login data and log files, analytics ID, searches, website registration and sound recordings (e.g. voice mail/phone recordings, Skype recordings).

In case you would like to be provided with information about a specific personal data processing activity, you can request that by submitting a request at [support@vatransformer.com](mailto:support@vatransformer.com).

#### **4. Why we use your personal data?**

We may use your personal data and other information as described above for the following purposes:

- to understand your interests and preferences in relation to our products;
- to register an account, grant you access to and authenticate you;
- to subscribe and in the course of the subscription to follow comments, posts, articles, authors, news and updates about our products and services;
- in the course of creation of and publishing media and press releases, to create brochures, news, media assets (such as images, videos), newsletters etc.;
- in order to create articles that will be published on our internal and external sites;
- to provide you the possibility to create your profile on our digital channels for example to create posts, make comments, follow posts and discussions and sign-up for newsletters etc.;
- to allow you making posts, comments, upload content, participate quizzes and publishing opinions on our digital channels;
- in the course of sharing job ads on our digital channels;
- to provide customer support and process, evaluate and respond to requests and inquiries;
- to collect your image and your personal data in the course of an event to show impressions of an event; and
- to create lists of contact persons for specific topics.

VTC only collects the personal data from you that we need for the above purposes. For statistical purposes, improvement of our services and testing of our IT systems we use as much as reasonably possible anonymized data. This means that these data can no longer (in)directly identify you or single you out as an individual.

VTC may offer certain digital channels where you can post information on the site which will then be available to other visitors of the site. Examples are discussion forums and comments on blogs. When you post, basic information identifying you as the poster will be made available to other visitors together with your posted information. This information includes your name or alias, and where relevant, may include other information such as your country or the name of the company or organization you work for. You have control over this data in your user profile and can control what will be shown in your posts.

We may also display statistical, reputational and other similar information related to your user account. Examples are the number of forum posts you have posted or a rating showing how useful other visitors have rated your posts.

## **5. What happens if you do not provide us with the information, we had asked you for or if you ask us to stop processing your information**

Where it concerns processing, and operations related to our digital channels (as described above), VTC will not be able to adequately establish, conduct or terminate a business relationship with you or your company and generally perform the purposes described above without certain personal data. Although we cannot obligate you to share your personal data with us, please note that this then may have consequences which could affect the use of the platform in a negative manner, such as not being able to provide the requested service, take requested pre-contractual measures to enter into a contract with you or to establish and continue the business.

## **6. The legal basis we rely on**

We use your personal data and other information related to you for the purposes described in this notice based on one of the following legal bases, as applicable:

- We may process your personal data for the fulfilment of contractual obligations resulting from contracts with you or your company, or as part of pre-contractual measures we take;
- We will ask your consent for the activities described in this privacy notice when required by applicable law, for example when we process your data for carrying out analytics by the use of first-and third-party cookies; or
- In some cases, we rely on our **legitimate interests** to process your personal data insofar as this is not overridden by your own privacy interests. Such interests may include:
  - Better understand users' behavior to further improve our offerings
  - Purposes of ensuring network and information security (for example to prevent malicious use such as hacking and denial of service attacks)
  - Offering a personalized service and communications
  - Analytics and profiling for business intelligence
  - Allowing interaction on products and services offered by us

## **7. Parties we share your personal data with (in and outside the country where our company that controls your data is located)**

We only share your personal data with other Virginia Transformer Corp affiliates or third parties as necessary for the purposes described in the table below. In certain services we offer, your group membership and user profile may be visible to other users in the same group and such user data is also visible to you. Where we share your personal data with an affiliate or third party so that it is transferred to or becomes accessible from outside the country where the VTC company that controls your data is located, we always put adequate safeguards in place to protect your personal data.

## **8. How long we keep your personal data**

Based on mandatory legislation, VTC must keep certain personal data for a minimum period of time. We only keep your personal data for as long as necessary for the purposes described in this privacy notice. After this time, we will securely delete your personal data, unless we are required to keep it in order to meet legal or regulatory obligations, or to resolve potential disputes. Note, VTC will to the

extent necessary delete posts, articles, press releases or destroy brochures, where your image was used; and will remove it from all databases to avoid further usage.

At the same time, applicable data protection laws require that we do not keep personal data in an identifiable form for any longer than is necessary for the purpose for which the personal data is being processed. Through the setting of IT applications and policies we ensure that our keeping of your personal data is deleted when we no longer need it.

## 9. Your data privacy rights

Depending on the jurisdiction in which you are located and in which your personal data is processed, you may have the following rights:

<b>Data privacy rights</b>	<b>What it means</b>
The right to access your data	You are entitled to ask VTC for an overview of or to obtain a copy of the personal data we hold about you.
The right to have your data corrected	You may request immediate correction of inaccurate or incomplete personal data we hold about you.
The right to have your data erased	You may request personal data to be erased when it is no longer needed, where applicable law obliges us to delete the data or the processing of it is unlawful.
The right to restrict data processing	You have the right to restrict the processing of your personal data in specific circumstances.
The right to data portability	You have the right to receive your personal data in a structured, machine-readable format for your own purposes, or to request us to transfer it to a third party.
The right to object to data processing	You have the right to object to our processing of your personal data where we rely on our legitimate interests as the basis for our processing, where your data protection rights outweigh our reasoning for legitimate interests.
The right to withdraw consent	Where VTC has asked for your consent to process personal data, you may withdraw your consent at any time. The withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.

Please note that the rights described above are not absolute, and that your request cannot always be met entirely. For example, sometimes we cannot delete or restrict the processing of your personal data as we may have legal obligations or contractual obligations to keep certain such personal data.

## 10. Contact and further information

If you want to access your personal data, make use of any of your other rights mentioned above or if you have any questions or concerns about how VTC processes your personal data, please contact us at 540-345-9892 or sales@vatransformer.com.

Should you not be satisfied with our response or believe we are processing your personal data against the law, you may also have the right to file a complaint with the Data Privacy Authority in your country of residence or work, or seek a remedy through the courts where you believe an infringement of data privacy laws may have taken place.

## 11. Links

The external sites linked to from the VTC web sites are developed by people over whom VTC exercises no control. These other sites may place their own cookies on your computer, collect data or solicit personal information. Please refer to the privacy notice on each site for more information.

## 12. Cookie Policy

A cookie is a small text file that a website stores on your computer or mobile device when you visit the site. We use cookies to improve the quality of our service and to better understand how people use our websites. We do this by storing user preferences in cookies and by tracking user trends and patterns of how people navigate our sites. We use cookies to distinguish visitors from each other by assigning a random anonymous identifier to each visitor. We may collect information about your browsing habits on our website (such as pages visited, links clicked on, length of time spent on certain pages etc.).

### Cookies specific to the VTC website

VTC's website uses both "first party" cookies (cookies set by the VTC website) and "third party" cookies (cookies set by a third-party website that is providing a service for the VTC website). We use first party cookies for keeping the website running, improving user experience, creating a profile of your interest to provide you tailored information according to your expressed interests storing preferences, tracking user trends and patterns with the help of web statistics providers and for storing data needed throughout your visit on the site (for example, contents of your shopping cart). We use third party cookies for analytics purposes.

Our website may use cookies of the following kinds:

- **Strictly necessary cookies:** Used for purposes such as to route the information over the network and detect transmission errors, control of electronic communication channels and traffic load, etc. These cookies are necessary for the website to function and cannot be switched off in our systems.
- **Functional cookies:** Used for purposes such as to remember your settings and preferences, history of your visit on the site, user authentication (logging in), increase the security, allow social networks users to share contents and when needed to play back video or audio content. These cookies are necessary to provide specific functionalities to you as a part of the services you have requested on the VTC digital channels.

- **Social plug-in tracking cookies:** Used by third party social network sites for purposes such as analytics when we embed content from their website on ours.
- **First and third-party analytics cookies:** Used for VTC's purposes such as to measure the traffic, performance and usage patterns of our website, test improvements of the website, detect search engine keywords that lead to a webpage or to track down website navigation issues. In the case of third-party analytics cookies, the data is anonymized.

In general, cookie data are stored for the duration of up to 24 months.

We may provide links to third party integrations. Third party integrations are websites or platforms that synchronize with our Site to provide you with additional functionality, tools, or services such as a direction, collecting resumes, sharing documents or videos, or sending announcements. You acknowledge and agree we are not responsible for the availability of such sites or resources and do not endorse and are not responsible or liable for any content, advertising, goods, services or other materials on, available through, or provided by such sites or resources. We are not responsible for the privacy or other practices of such sites and cannot guarantee the security of any of your personal information that you provide or is collected by such sites. We encourage you to review the privacy policies and terms and conditions on those linked sites.

### **How to manage cookies**

You can set your browser to refuse all cookies or to indicate when a cookie is being sent. However, some features or services on our sites may not function properly without cookies.

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