



General Data Protection Notice for Customers and Business Partners

I. Introduction and scope

This General Data Protection Notice (the "Notice") applies to the processing of personal data by ZF Friedrichshafen AG and its EU-based affiliates as part of the worldwide ZF Group ("ZF Group"). For purposes of this Notice, affiliates means any company with respect to which ZF Friedrichshafen AG owns, directly or indirectly, more than 50% of the shares, together ZF ("ZF").

ZF considers protecting the personal data of all customers and business partners to be an important priority. This includes consumers as end-use customers and employees of our business partners in their role as contact persons and representatives in the context of a business relationship.

ZF is committed to processing Personal Data responsibly and in compliance with the applicable data protection laws in all countries in which ZF operates. This Notice describes the types of Personal Data ZF collects, how ZF uses that Personal Data, with whom ZF shares your Personal Data, and the rights you, as a Data Subject, have regarding ZF's use of the Personal Data. This Notice also describes the measures ZF takes to protect the security of the data and how you can contact us about our data protection practices.

II. Contact details of the Data Controllers

The legal entities responsible for the collection and use of your Personal Data (the "Data Controllers") in your home country for the purposes described in this Notice are contained in the attached Annex 1.

III. Contact details of the Data Protection Officer

A Data Protection Officer ("DPO") is designated for each legal entity where required by applicable law. The DPO is involved in all issues related to the protection of your Personal Data. In particular, the DPO is in charge of monitoring and ensuring compliance with this Notice and the applicable data protection laws. For any comments or questions you may have regarding this Notice, please contact the ZF Group Coordinator for data protection, who is also the DPO of ZF Friedrichshafen AG, Ms. Silke Wolf, at the following address:

Silke Wolf
ZF Friedrichshafen AG
Corporate Headquarters / ZF Forum
Löwentaler Straße 20
88046 Friedrichshafen
Germany



You may also contact the ZF Group Coordinator for data protection by e-mail under dataprotection@zf.com.

IV. Categories of Personal Data processed

We process the following Personal Data for a number of business purposes that we list further below:

- Contact information of customers and business partners' contact persons, such as first name, family name, address, email address, phone number, fax number, company name, job title, function, department, management level, line manager;
- Contract information of consumers (provided they are end-use customers) including financial data such as bank account information, creditworthiness, terms of payment and financing; and
- Data from an end-use customer's vehicle consisting of the vehicle identification number (VIN), the license plate number, as well as transmission records related to individual driving.

The Personal Data processed is limited to the data necessary for carrying out the business purpose for which such Personal Data is collected. ZF will maintain Personal Data in a manner that ensures it is accurate, complete and up-to-date.

ZF will collect the Personal Data as a general rule directly from the Data Subject. However, in line with legal provisions, data may also be collected from third parties. In particular, this applies to data regarding an end-use customer's vehicle in the event that automotive manufacturers return to ZF products that have been sold to them to be incorporated in their vehicles.

V. Purposes of data processing and legal bases

ZF processes Personal Data in accordance with applicable data protection laws and regulations and only for limited, explicit and legitimate purposes. ZF will not use Personal Data for any purpose that is incompatible with the original purpose for which it was collected unless you provide your prior explicit consent for further use.

Personal Data relating to customers and business partners may be processed for the purposes of:

- Managing commercial relationships and strategies with current and potential customers as well as business partners such as vendors and suppliers;
- Carrying out promotional and marketing operations;
- Managing ZF's external accounting, tax and treasury systems;



- Managing ZF's IT customer relationship and service operations;
- Conducting quality audits, assessments and complaint management;
- Managing product research and development ("R&D"); and
- Product support and maintenance, failure diagnostic and identification of fault patterns.

The legal bases for the purposes listed above are the underlying contract with a customer or business partner, the request of a Data Subject in a pre-contractual situation allowing ZF to take steps prior to entering into a contract, or applicable legal provisions, e.g. the Tax Code or the Product Liability Act. Further, Personal Data of our customers and business partners (including their contact persons and sales representatives) will be processed for the purposes of ZF's legitimate business interests consisting of customer relationship management, quality assurance, complaints management, marketing and promotional activities and only as long as ZF's legitimate interests are not overridden by the Data Subject's interests or fundamental rights and freedoms or if Data Subjects have given their consent to do so.

ZF ensures that our internal governance procedures clearly specify the reasons behind decisions to use Personal Data for alternative processing purposes. Prior to using your personal data for a purpose other than the one for which it was initially collected, you will be informed about such new purpose.

VI. Data Security

ZF has implemented appropriate technical and organizational measures to ensure a level of security appropriate to the risk, such risk analysis includes an analysis of the risk of compromising the rights of the Data Subject, costs of implementation, and the nature, scope, context and purposes for data processing.

The measures include

- (i) encryption of personal data where applicable/appropriate;
- (ii) the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- (iii) 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
- (iv) a process for regularly testing, assessing and evaluating the effectiveness of technical and organizational measures for ensuring the security of the processing.



VII. Recipients of Personal Data

ZF Friedrichshafen AG is the corporate headquarter of the ZF Group. Due to shared corporate IT systems within the ZF Group and because of the international nature of our business, Personal Data collected and processed by ZF Friedrichshafen AG and its subsidiaries ("ZF legal entities") can be shared with or accessed by other ZF legal entities of the ZF Group for the purposes above. A data transfer to ZF legal entities outside of the EU will only occur under the provisions for international data transfers laid out in Section VIII of this Notice (see below). An overview of the ZF legal entities that are part of the ZF Group can be found at:

<https://www.zf.com/locations>

Collected Personal Data will only be transferred to carefully selected data processors acting on the basis of ZF's instructions to comply with the applicable legal and contractual obligations. ZF will only grant access to Personal Data on a need-to-know basis, and such access will be limited to the Personal Data that is necessary to perform the function for which such access is granted. Authorization to access Personal Data will always be linked to the function so that no authorization will be extended to access Personal Data on a personal basis. Service providers and other data processors will only receive Personal Data according to the purposes of the service agreement with ZF.

VIII. International data transfers

International data transfers refer to transfers of Personal Data outside of the European Economic Area ("EEA"). The international footprint of ZF involves the transfer of Personal Data to and from other group companies or third parties, which may be located outside the EEA, including the United States of America. ZF will ensure that Personal Data is transferred to countries that have adequate data protection standards as per the European Commission's specifications. Alternatively, data will only be transferred after implementation of appropriate safeguards to adequately protect the Personal Data and secure that such data transfers are in compliance with applicable data protection laws. ZF has implemented Data Transfer agreements based on EU model clauses to cover international data transfers. A copy of these agreements can be obtained by contacting the ZF Group Coordinator for Data Protection (see Section III. above).

IX. Retention of Personal Data

ZF will not retain your Personal Data for longer than is allowed under the applicable data protection laws and regulations or for longer than is justified for the purposes for which it was originally collected. As a general rule, collected data will be deleted as soon as there no longer exists a business relationship with the customer/business partner or in the event of communication inactivity for the duration of a period of 2 years. However, collected data may be subject to retention requirements



pursuant to applicable legal provisions. In other cases, Personal Data may be stored and retained for as long as the statutory period of limitations with regards to legal claims against ZF has not expired.

X. Data protection rights

Under applicable data protection laws, you will benefit from the following rights. You can exercise these rights at any time by contacting the ZF Group Coordinator for data protection (see Section III. above):

- Right to access to, rectification and erasure of Personal Data;
- Right to restriction of processing;
- Right of data portability to the extent applicable;
- Right to withdraw consent where the processing is based on consent;
- Right to lodge a complaint with the supervisory authority and
- Right to **object to processing**.

XI. Notice Compliance and Contact Information

Monitoring and ensuring compliance of the Personal Data processing within ZF with this Notice and applicable data protection laws and regulations is the responsibility of the ZF Group Coordinator for data protection and of your local DPO, where applicable.

You may contact the ZF Group Coordinator for data protection with regard to any issue related to processing of your Personal Data and to exercise your rights as mentioned above.

XII. Miscellaneous

This Notice will be effective as of 25 May 2018 and will be applicable to ZF (see Section I. above for a precise definition of the scope).

This Notice may be revised and amended from time to time and appropriate notice about any amendments will be given.

ZF is allowed to adapt the text of this Notice only in order to be compliant with local legislation by means of an addendum attached to this Notice. In case of any discrepancies between this Notice and a specific local addendum made in accordance with local law, the terms of the latter will prevail.



Annex 1

Name	Address	Telephone Number
Alfaro Brakes S.L.U.	Poligono Industrial del Pilar Calli Azagra No. 2 26540 Alfaro Spain	+34 941 184596
Autocruise S.A.S.	ZAC Technolpole Brest Iroise Secteur de la Pointe de Diable 29280 Plouzané France	+33 2 98 45 43 68
Automotive Holdings (Spain) S.L.U.	Camino del Caramuxo 35 36213 Vigo Spain	+34 986 29 31 29
Automotive Holdings (UK) Limited	Stratford Road Technical Centre, West Midlands B90 4AX Shirley United Kingdom	+44 121 5065085
Compagnie Financière de ZF SAS	Boulevard Pierre Desgranges 4 42166 Andrézieux-Bouthéon France	+33 4 77 36 33 33
Dalphi Metal Espana, S.A.	Parque Tecnológico de Boecillo Avda. Francisco Valles, Parcela 206 47151 Boecillo (Valladolid) Spain	+34 986 29 31 29
Eurofren Systems S.L.U.	Calle A Poligono Industrial 31192 Mutliva Baja Spain	+34 948 291300
fka Forschungsgesellschaft Kraftfahrwesen mit beschränkter Haftung, Aachen	Steinbachstraße 7 52074 Aachen Germany	+49 2418 8610
FORINA GmbH & Co. KG	Emil-Riedl-Weg 6 82049 Pullach i. Isartal Germany	+44 121 5065085
FTU Beteiligungsverwaltung GmbH	Cherrystraße	+49 9643 18 0



	91275 Auerbach Germany	
GAT - Gesellschaft für Antriebstechnik mbH	Konrad-Zuse-Straße 3 52477 Alsdorf Germany	+49 2404 98750
ID Information Systems Limited	Stratford Road Technical Centre, West Midlands B90 4AX Shirley United Kingdom	+44 121 5065085
Ing. Tsetinis Beratungs GmbH	Kellau 151 5431 Kuchl Austria	+43 6244 202 55
Lemförder Electronic GmbH	Von dem Bussche-Münch- Straße 12 32339 Espelkamp Germany	+49 5772 5672000
Lommelpark NV	Molsekiezel 95 3920 Lommel Belgium	+32 11 63 9548
Lucas Automotive GmbH	Carl-Spaeter-Straße 8 56070 Koblenz Germany	+49 261 8950
Lucas Automotive Grundstücksverwaltungs AG & Co. KG	Carl-Spaeter-Straße 8 56070 Koblenz Germany	+49 261 8950
Lucas Industries Limited	Stratford Road Technical Centre, West Midlands B90 4AX Shirley United Kingdom	+44 121 5065085
Lucas Varity GmbH	Carl-Spaeter-Straße 8 56070 Koblenz Germany	+49 261 8950
Lucas Varity Grundstücksverwaltungs AG & Co. KG	Carl-Spaeter-Straße 8 56070 Koblenz Germany	+49 261 8950
LucasVarity	Stratford Road Technical Centre, West Midlands	+44 121 5065085



	B90 4AX Shirley United Kingdom	
Midwest Lemförder Limited	PO Box 35 Wednesbury, West Midlands WS10 8BH Darlaston United Kingdom	+44 121 526 4441
Openmatics s.r.o.	Poděbradova 2842/1 301 00 Pilsen Czech Republic	+420 371 150 000
Roadster Automotive B.V.	Office 9.08 , Kingsfordweg 151, 1043 GR Amsterdam Netherlands	+31 20 491 9151
Safebag - Industria Componentes de Seguranca Automovel S.A.	Casal dos Santos-Fornelos 4990-625 Ponte de Lima Portugal	+351 258 900 840
Safe-Life-Industria de Componentes de Seguranca Automovel S.A.	Zona Industrial da Gemieira 4990-625 Ponte de Lima Portugal	+351 258 900 450
Société de Gestion Brézin SARL	Boulevard Pierre Desgranges 4 42166 Andrézieux-Bouthéon France	+33 4 77 36 33 33
TRW Airbag Systems GmbH	Wernher-von-Braun-Straße 1 84544 Aschau am Inn Germany	+49 8638 965144
TRW Airbag Systems Grundstücksverwaltungs AG & Co. KG	Wernher-von-Braun-Straße 1 84544 Aschau am Inn Germany	+49 8638 965144
TRW Airbag Systems SRL	Strada Stefan cel Mare Street 258 Constructia C1 611040 Romesmarkt Romania	+40 752 722 010
TRW Auto B.V.	Office 9.08 , Kingsfordweg 151, 1043 GR Amsterdam Netherlands	+31 20 491 9151
TRW Automotive (Slovakia) s.r.o.	Trencianska 2571/16 915 01 Nove Mesto nad Vahom Slovakia	+421 32 3236202
TRW Automotive Bonneval S.A.S.	Le Clos Aux Moines 3	+33 237 444800



	28800 Bonneval France	
TRW Automotive Czech s.r.o	Na Roli 26 466 21 Jablonec nad Nisou Czech Republic	+42 042 8354111
TRW Automotive Distribution France S.A.S.	Rue du General Leclerc 1 Le Linea 92800 Puteaux France	+33 1 58 584500
TRW Automotive Electronics & Components Grundstücksverwaltungs AG & Co. KG	Freiligrathstraße Jan 00 Schalke-Nord 45881 Gelsenkirchen Germany	+49 209 8002251
TRW Automotive Espana S.L.U.	Termino del Ombatillo Corella Spain	+34 91 5152270
TRW Automotive GmbH	Industriestraße 20 73553 Alfdorf Germany	+49 7172 3020
TRW Automotive Grundstücksverwaltungs AG & Co. KG	Industriestraße 20 73553 Alfdorf Germany	+49 7172 3020
TRW Automotive Holding GmbH & Co. KG	Industriestraße 20 73553 Alfdorf Germany	+49 7172 3020
TRW Automotive Holding Italia S.r.l.	Strada del Portone 159 10095 Turin Italy	+39 0121 348295
TRW Automotive Holding Verwaltungs GmbH	Industriestraße 20 73553 Alfdorf Germany	+49 7172 3020
TRW Automotive Holdings (France) SAS	Rue du General Leclerc 1 Le Linea 92800 Puteaux France	+33 1 58 584500
TRW Automotive Italia s.r.l.	Via Donizetti 11 20090 Assago (Milan) Italy	+39 02 66088500
TRW Automotive Portugal Lda	Centro Empresarial de Talaíde Estrada Octávio Pato	+351 214 228300



	2785-723 Lisbon Portugal	
TRW Automotive Safety Systems GmbH	Hefner-Alteneck Straße 11 63743 Aschaffenburg Germany	+49 6021 3140
TRW Automotive Safety Systems Grundstücksverwaltungs AG & Co. KG	Hefner-Alteneck Straße 11 63743 Aschaffenburg Germany	+49 6021 3140
TRW Automotive Safety Systems SRL	Strada Macin 16 300137 Temeswar Romania	+40 256 400 000
TRW Automotive Sweden AB	Kikkejaur 1 933 99 Arvidsjaur Sweden	+46 960 57800
TRW Braking Systems Polska Sp. z o.o.	Ulica Leonarda da Vinci 7 44-121 Gliwice Poland	+48 32 338 20 75
TRW Coöperatief W.A.	Office 9.08 , Kingsfordweg 151, 1043 GR Amsterdam Netherlands	+31 20 491 9151
TRW Deutschland Holding GmbH	Carl-Spaeter-Straße 8 56070 Koblenz Germany	+49 261 8950
TRW International Holdings B.V.	Office 9.08 , Kingsfordweg 151, 1043 GR Amsterdam Netherlands	+31 20 491 9151
TRW KFZ Ausrüstung GmbH	Rudolf-Diesel-Straße 7 56566 Neuwied Germany	+49 2631 9120
TRW Limited	Stratford Road Technical Centre, West Midlands B90 4AX Shirley United Kingdom	+44 121 5065085
TRW Logistic Services GmbH	Im Häsfeld 1 66802 Überherrn Germany	+49 6836 96960
TRW LucasVarity Limited	Stratford Road Technical Centre, West Midlands	+44 121 5065085



	B90 4AX Shirley United Kingdom	
TRW PARIS SAS	Rue du General Leclerc 1 Le Linea 92800 Puteaux France	+33 1 58 584500
TRW Polska Sp. z o.o.	Ulica Rolnicza 33 42-200 Czestochowa Poland	+48 343 625100
TRW Receivables Finance GmbH	Frankfurter Straße 21-25 65760 Eschborn Germany	+49 6196 50970
TRW Steering Systems Poland Sp. z o.o.	Ulica Slowackiego 33 43-502 Czechowice-Dziedzice Poland	+48 32 2158245
TRW Systemes de Freinage S.A.S.	Avenue de la Gare 1 57320 Bouzonville France	+33 3 87 78 21 11
TRW Systems Limited	Stratford Road Technical Centre, West Midlands B90 4AX Shirley United Kingdom	+49 6196 50970
TRW U.K. Limited	Stratford Road Technical Centre, West Midlands B90 4AX Shirley United Kingdom	+44 121 5065085
TRW-Carr s.r.o.	Hlavenec 161 29474 Hlavenec Czech Republic	+420 202 810222
Tsetinis Tooling GmbH	Hertzstraße 12 76187 Karlsruhe Germany	+49 721 915112-10
ZF Asia B.V.	Office 9.08 , Kingsfordweg 151, 1043 GR Amsterdam Netherlands	+31 20 491 9151
ZF Asia-Pacific Holding GmbH	Löwentaler Straße 20 88046 Friedrichshafen	+49 7541 77 0



	Germany	
ZF Aurelia GmbH	Löwentaler Straße 20 88046 Friedrichshafen Germany	+49 7541 77 0
ZF Auslandsverwaltungs GmbH	Löwentaler Straße 20 88046 Friedrichshafen Germany	+49 7541 77 0
ZF Bouthéon SAS	Boulevard Pierre Desgranges 4 42166 Andrézieux-Bouthéon France	+33 4 77 36 33 33
ZF Cassiopeia GmbH	Löwentaler Straße 20 88046 Friedrichshafen Germany	+49 7541 77 0
ZF Chassis Systems Žatec s. r. o.	Bedricha Smetany 167/2 Innere Stadt 301 00 Pilsen Czech Republic	+420 737 182 404
ZF Danmark ApS	Taastrupgaardsvej 8-10 2630 Tåstrup Denmark	+45 7022 6243
ZF Electronics Klášterec s.r.o.	Osvobozená 780 431 51 Klášterec nad Ohří Czech Republic	+420 474 359 111
ZF Engineering Plzeň s.r.o.	Univerzitní 1159/53 301 00 Pilsen Czech Republic	+420 373 736 311
ZF Europa Beteiligungs GmbH	Löwentaler Straße 20 88046 Friedrichshafen Germany	+49 7541 77 0
ZF Europe B.V.	Office 9.08 , Kingsfordweg 151, 1043 GR Amsterdam Netherlands	+31 20 491 9151
ZF Friedrichshafen AG	Löwentaler Straße 20 88046 Friedrichshafen Germany	+49 7541 77 0
ZF Gastronomie Service GmbH	Ehlersstraße 50 88046 Friedrichshafen Germany	+49 7541 77 0
ZF Getriebe Brandenburg GmbH	Caasmannstraße 9 14770 Brandenburg	+49 3381 370



	Germany	
ZF Gusstechnologie GmbH	Nopitschstraße 171 90441 Nürnberg Germany	+49 911 41500
ZF Holding Austria GmbH	Schönauerstraße 5 4400 Steyr Austria	+43 7252 5800
ZF Holdings B.V.	Office 9.08 , Kingsfordweg 151, 1043 GR Amsterdam Netherlands	+31 20 491 9151
ZF Hungária Ipari és Kereskedelmi Korlátolt Felelősségű Társaság	Kistályai út 2 3300 Eger Hungary	+36 36 520 100
ZF Industrieantriebe Witten GmbH	Mannesmannstraße 29 58455 Witten Germany	+49 2302 877 0
ZF Insurance Management GmbH	Ehlersstraße 50 88046 Friedrichshafen Germany	+49 7541 77 0
ZF International B.V.	Distributieweg 7 2645 EG Delfgauw Netherlands	+31 15 270 2350
ZF Italia S.r.l.	Via Donizetti 11 20090 Assago Italy	+39 02 66088500
ZF Lemförder Achssysteme Ges.m.b.H.	Parkring 1 8403 Lebring Austria	+43 3182 49095300
ZF Lemförder Facility Management GmbH	Alter Bahndamm 12 49448 Lemförde Germany	+49 5474 600
ZF Lemförder Métal France S.A.S.	Rue Pascal 1 Zone Industrielle Sainte Agathe 57190 Florange France	+33 3 82 59 12 82
ZF Lemförder TVA, S.A.U.	Zeharkalea Ctra. Mallabia, Polígono Industrial Urtía 48260 Ermua Spain	+34 943 17 21 50



ZF Lemforder UK Limited	PO Box 35 Wednesbury, West Midlands WS10 8BH Darlaston United Kingdom	+44 121 526 4441
ZF Luftfahrttechnik GmbH	Flugplatzstraße 34379 Calden Germany	+49 5674 7010
ZF Marine Krimpen BV	Zaag 27 2931 LD Krimpen aan de Lek Netherlands	+31 18 033 1000
ZF NewCO II GmbH	Löwentaler Straße 20 88046 Friedrichshafen Germany	+49 7541 77 0
ZF Nürnberg Trading and Asset GmbH & Co. KG	Nopitschstraße 71 90441 Nürnberg Germany	+49 911 41500
ZF Österreich Gesellschaft m.b.H.	Carlberggasse 70 1230 Wien Austria	+43 1 865450000
ZF Padova S.r.l.	Via Penghe 48 Caselle 35030 Selvazzano Dentro Italy	+39 049 8299 311
ZF RACE ENGINEERING GmbH	Ernst-Sachs-Straße 62 Tor 1 97424 Schweinfurt Germany	+49 972 1475 0
ZF Sachs España S.A. (Sociedad Unipersonal)	Barrio Aretxalde 130 48196 Lezama Spain	+34 944 55 50 50
ZF Sachs Italia S.p.A.	Via Sestriere 28/2 10060 Candiolo Italy	+39 011 092 2311
ZF Services Belgium N.V.- SA	Antoon Van Osslaan 1 B26 Industriezone Galilei 1120 Brüssel Belgium	+32 240 16112
ZF Services España, S.L.U.	Calle Sant Esteve 29 08173 Sant Cugat del Vallès	+34 936 750954



	Spain	
ZF Services France S.A.S.	Rue Henri Poincaré 3-11 92160 Antony France	+33 1 70 74 78 00
ZF Services Nederland B.V.	Distributieweg 7 2645 EG Delfgauw Netherlands	+31 15 270 2350
ZF Services Portugal, Unipessoal Lda.	Quinta do Carmo Lote 55 2685-129 Sacavém Portugal	+351 21 9497410
ZF Services UK Limited	Abbeyfield Road Lenton Industrial Estate NG7 2SX Nottingham United Kingdom	+44 333 240 1123
ZF Slovakia a.s.	Strojársená 2 91702 Trnava Slovakia	+421 33 5959 111
ZF South America Holdings B.V.	Office 9.08 , Kingsfordweg 151, 1043 GR Amsterdam Netherlands	+31 20 491 9151
ZF Staňkov s.r.o.	Ohucov 25 345 61 Stankov Czech Republic	+420 379 410 811
ZF Steyr Ges.m.b.H.	Schönauerstraße 5 4400 Steyr Austria	+43 7252 5800
ZF Steyr Präzisionstechnik GmbH	Schönauerstraße 5 4400 Steyr Austria	+43 7252 5800
ZF Wind Power Antwerpen NV	Gerard Mercatorstraat 40 3920 Lommel Belgium	+32 11 34 97 00
Zukunft Mobility GmbH	Ruppertswies 14 85092 Kösching Germany	+49 841 14902000
Zukunft Ventures GmbH	Graf-von-Soden-Platz 1 Empfang 88046 Friedrichshafen Germany	+49 7541 77 0

