



## Lochinvar Website Privacy Policy

Lochinvar appreciates your interest in our products and our company and is committed to protecting your privacy. This Privacy Policy explains our global information practices. By using this Site or any application provided through this Site, you are agreeing to the terms of use laid out in this Privacy Policy.

### SCOPE

This Privacy Policy applies to Lochinvar LLC and Lochinvar Ltd., subsidiaries of A. O. Smith Corporation, [www.lochinvar.ltd.uk](http://www.lochinvar.ltd.uk), [www.lochinvar.com](http://www.lochinvar.com), and any other affiliated websites (including mobile accessible sites, social media and apps) which may be operated by our group companies (all of which are referred to as the “Site” in this policy).

The Site is owned and operated by Lochinvar’s parent entity, A. O. Smith Corporation, a Delaware corporation of 11270 West Park Place, Suite 170, Milwaukee, WI 53224, USA. We refer to Lochinvar, together with A. O. Smith Corporation and its other group companies, as “Lochinvar”, A. O. Smith”, “we”, “us” or “our” in this Privacy Policy. You can find out more about all of the A. O. Smith group entities worldwide by reviewing our corporate filings here <http://investor.aosmith.com/> and by looking at the details of our global facilities here <http://www.aosmith.com/about/>.

### WHAT INFORMATION IS COLLECTED?

Lochinvar does not collect personally identifiable information from individuals unless they provide it to us voluntarily and knowingly. However, we collect a limited amount of personal information from you in certain areas of the Site for various reasons, such as when you enter in information to use certain areas of the Site, or when you contact customer support services, or, when you make an online purchase. The details below describe the information we may collect.

**Information Provided by User:** Most of the information we collect is information provided directly by you, including:

- “contact us” submissions – any information that you submit through the How To Contact Us functionality on the Site;
- contact information such as name, job title, company name, department, email address, physical mailing address and telephone number;
- professional information such as your employment background, job description and related information;
- transaction information including your contact information, the products you are interested in, your purchasing requirements, your financial information including credit card or other payment information; or
- responses to surveys – any information you provide in responding to a survey on the website, via an app or email, on the telephone or otherwise.

**Information Based on Behavior and Navigation on Sites:** We may also collect and process information obtained through the Site or the device you are using, including:

- location information (including GPS signals sent by a mobile device, location information gathered from social media networks or sensor or IP address data from your device);



- information from cookies, web beacons or from the internet, including your IP address, browser type, operating system, domain name, access times, which pages you visit within our website, duration of visits to each page, any error codes on the Site, and referring website addresses. You can find out more about how we do that in the section below entitled “Cookies”;
- if you ask us to connect with other sites (for example if you ask us to connect with your Facebook account) we may get information that way too; or
- we may record any telephone calls for quality assurance and training purposes.

We may use publicly accessible information to verify information we are provided with and to manage and expand our business.

**Information Provided through Recruiting Efforts:** If you use the Site to apply to work with us, we will use the information you supply to process your application and to monitor recruitment statistics. As a global business, we may transfer your details outside of your home country and to other companies in our group. We may also use third parties to help with that. To enable us to respond to your interest, we will share your personal information in an appropriate manner among our people involved in the recruitment and hiring process or who are involved in recruitment authorization or decision-making. As a global business, this may involve people in a range of A. O. Smith group companies in different countries around the world. This will include our people in those countries where your preferred employment opportunities are located and, in addition, if we consider that an appropriate opportunity for you may exist outside those preferences, we may share your information with other A. O. Smith group companies in other countries.

Information about candidates who are not hired may be held for up to 12 months, and occasionally longer where necessary, after the recruitment exercise has been completed. We retain de-personalized statistical information about applicants to help inform our recruitment activities, but individuals should not be identifiable from that data. Once a person has taken up employment with us, we will compile a file relating to their employment. At that stage we will give more details about how we hold employee data and we will expect the employee to sign up to additional privacy terms as part of their employment. Successful candidates would be expected to agree to our internal privacy policies which are binding on all of our employees.

**Information Provided through Our Integrity Helpline Site:** We also have in place an integrity helpline to enable employees and others to report any concerns. This helpline is provided for us by NAVEX Global, Inc. Their privacy policy can be found here: <http://www.navexglobal.com/en-uk/privacy-statement> and there are special privacy terms in place if you use this service.

**Information Provided through Refer a Friend Programs:** On some of our Sites, we have Refer a Friend Programs in place. If you are using one of these programs, you must have your friend’s permission before submitting their details and there may be special privacy terms in place if you use this service.

#### **HOW DOES LOCHINVAR USE THE INFORMATION?**

Our primary purpose in collecting the information described in this Privacy Policy, including your personal data, is to provide you with the services you requested and those which we believe will optimize your use of the Site. We may use the information for the following purposes:

- to provide the information, services or support you request and related after-sales services;



- to identify you, and to contact you from time to time with product or service updates;
- to send other messages that are useful to the service we provide;
- to manage our relationship with you and to carry out any related administration;
- to promote our services, or the services of our partners, including by email and via social media platforms;
- to compare information for accuracy, and verify it with third parties;
- to detect, investigate and prevent activity we think may be potentially illegal, unlawful or harmful and to enforce our Privacy Policy and/or our Terms and Conditions or any other purpose referenced there; or
- to carry out research, including market research, statistical research on site traffic, sales and other commercial information to assist us in improving the services we provide to you and tailor the Site.

### **WILL LOCHINVAR SHARE OR TRANSFER THE INFORMATION?**

Where necessary, Lochinvar may share your information with third parties who help deliver our products and services to you. Examples include hosting our web servers, analysing data, providing marketing assistance, providing product installation and service, processing of credit card transactions, and providing customer service. We also sometimes share data with others for comparison purposes – for example, to benchmark consumer research and marketing results. These companies will have access to your personal information as necessary to perform their functions, but they should not use that data for any other purpose. We may also share your personal data with companies in our group and/or our affiliates; or with any third party you have asked us to share your personal data with – such as Facebook or any other social media site if you have asked us to connect with your account.

Lochinvar may disclose your personal data to enforce our obligations or in the interests of security, public interest or law enforcement in any country where we have an interest. For example, we may respond to a request by a law enforcement agency or regulatory or governmental authority. We may also disclose data in connection with actual or proposed litigation, or to protect our property, security, people and other rights or interests.

If we or any part of our group is sold, or some of its assets transferred to a third party, your personal information, as an asset, may also be transferred to the acquirer, even if they are not in the same line of business as us. Our customer database could be sold separately from the rest of the business, in whole or in a number of parts. Potential purchasers and their advisors may have limited access to data as part of the sale process. However, use of your personal information will remain subject to this Privacy Policy. Similarly, your personal information may be passed on to a successor in interest in the unlikely event of a liquidation, bankruptcy or administration.

Lochinvar may need to transfer your personal data outside of your location, including to the United States and other countries where A. O. Smith and its group companies operate. We may also need to transfer your personal data to other countries where our service providers have facilities. Some of these countries are located outside the European Economic Area.

Please remember that when you share information publicly on the Site, for example a comment on a blog post, it may be indexable by search engines, including Google, which may mean that the information is made public.



### **HOW LONG DOES LOCHINVAR KEEP INFORMATION?**

Lochinvar will retain your personal data only as long as is necessary for the purposes set out in this Privacy Policy, or as is required by applicable law, and then we will delete it.

### **HOW DOES LOCHINVAR PROTECT THE INFORMATION?**

We take what we consider to be appropriate technical and organizational measures to guard against unauthorized or unlawful processing of your personal data and against accidental loss or destruction of, or damage to, your personal data. While no system is completely secure, we believe the measures implemented by the Site reduce our vulnerability to security problems to a level appropriate to the type of data involved. We have security measures in place designed to protect our user database and access to this database is restricted internally. However, it remains your responsibility to do the following:

1. Where you have a user account for the Site:
  - to log off or exit from Site when not using it;
  - to ensure no-one else uses the Site while your device is logged on to the Site (including by logging on to your device through a mobile, Wi-Fi or shared access connection you are using); and
  - to keep your password or other access information secret. Your password and log in details are personal to you and should not be given to anyone else or used to provide shared access for example over a network. You should use a password which is unique to your use of the Site – do not use the same password as you use for another site or email account.
  
2. To maintain good internet security. For example if your email account or Facebook account is compromised this could allow access to your account with us if you have given us those details and/or permitted access through those accounts. If your email account is compromised it could be used to ask us to reset a password and gain access to your account with us. You should keep all of your account details secure. If you think that any of your accounts has been compromised you should change your account credentials with us, and in particular make sure any compromised account does not allow access to your account with us. You should also tell us as soon as you can so that we can try to help you keep your account secure and if necessary warn anyone else who could be affected.

We do not knowingly collect or process data from anyone under the age of thirteen (13) years old.

### **YOUR CHOICES**

Please make sure that you maintain the accuracy and validity of any data you provide to us. Where you have online access, you may correct, update or delete the personal information that you have provided to us by going to our website, entering your login information and password and editing information provided previously.

In some countries you may have the right to see the information we maintain. If you wish to inquire about this service, then please contact us. We may charge a small fee for this service where permitted by local law. In some countries, you may have a right to change or request the deletion of information we hold about you. This could include changing your contact details or your payment details or cancelling your account.

If you have given permission, we may contact you by mail, telephone, SMS, text/picture/video message, fax, email and social media about products, services, promotions, special offers, charitable causes that may be of interest to you. If you prefer not to receive any direct marketing communications from us, you can opt out at any time.

If you wish to exercise your rights described in this section, you should:

- put your request in writing (an email sent to [InfoSecpolicy@aosmith.com](mailto:InfoSecpolicy@aosmith.com) with a header that says 'Unsubscribe' is acceptable);
- provide us with enough information to identify you (e.g. account number, username, registration details); and
- if your objection is not to direct marketing in general, but to direct marketing by a particular channel (e.g. email or telephone), please specify the channel you are objecting to.

## COOKIES

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used to make websites work, or work more efficiently as well as to provide information to the owners of the website. Most web browsers allow some control of most cookies through the browser settings. Lochinvar uses cookies and other online tracking devices such as web beacons and single-pixel gifs on the Site to:

- recognise you whenever you visit this website (this speeds up your access to the website as you do not have to log on each time);
- obtain information about your preferences, online movements and use of the internet;
- carry out research and statistical analysis to help improve our content, products and services and to help us better understand our visitor and customer requirements and interests;
- target our marketing and advertising campaigns and those of our partners more effectively by providing interest-based advertisements that are personalised to your interests; and
- make your online experience more efficient and enjoyable.

If you visit our website when your browser is set to accept cookies, we will interpret this as an indication that you consent to our use of cookies and other similar technologies as described in this Privacy Policy. If you change your mind in the future about letting us use cookies, you can modify the settings of your browser to reject cookies or disable cookies completely.

**Third-party cookies:** We work with third-party suppliers who may also set cookies on our website, for example Google, Facebook, Twitter and YouTube (which we use to display video content). These third-party suppliers are responsible for the cookies they set on our site. If you want further information please go to the website for the relevant third party.

**How to turn off cookies:** If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the



functionality of this website. For further information about cookies and how to disable them please go to: [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

For more information about Lochinvar's use of cookies, please contact us.

### **THIRD PARTY LINKS AND SERVICES**

The Site may contain links to third parties' websites. We are not responsible for the privacy practices or the content of those websites. Therefore, please read carefully any privacy policies on those links or websites before either agreeing to their terms or using those websites. Lochinvar may also use Google Analytics to gather statistics on site usage. This may involve the use of cookies. There are more details in Google's own privacy policy. Google may aggregate data they collect from their various services including Google Analytics, Google Translate, Google Maps and YouTube. You acknowledge and accept that we have no control over Google's data collection. If you have asked us to share data with third party sites (such as social media sites), their servers may not be secure.

Note that, despite the measures taken by us and the third parties we engage, the internet is not secure. As a result others may nevertheless unlawfully intercept or access private transmissions or data.

### **CHANGES TO THIS POLICY**

We may occasionally amend this Privacy Policy. This Privacy Policy was last updated on August 15, 2016 and applies from that date. Any new policy will automatically be effective when it is published on the Site. You should therefore return here regularly to view our most up-to-date Privacy Policy. If you would like to keep a permanent record of this Privacy Policy, please print a copy now.

### **CONTACT**

If you have any questions about this Privacy Policy, the practices of this Site, Lochinvar's handling of your information, or your dealings with this Site, please contact us at [InfoSecpolicy@aosmith.com](mailto:InfoSecpolicy@aosmith.com).