



PRIVACY POLICY

A  **TOPCON** and  **DIIVITECH** joint venture company

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Privacy Policy

General Terms

Tierra S.p.A. intends to protect values such as confidentiality and personal data protection rights, in compliance with applicable laws.

This Privacy Policy relates to our use of any personal information you provide to us.

In order to provide you with the full range of Tierra S.p.A. services, we are sometimes required to collect information about you.

This privacy policy explains the following:

- what information Tierra S.p.A. may collect about you;
- how Tierra S.p.A. will use information we collect about you;
- whether Tierra S.p.A. will disclose your details to anyone else;
- when Tierra S.p.A. may use your details to contact you;
- your choices regarding the personal information you have provided to us;

As set out above, Tierra S.p.A. is committed to safeguarding your personal information. Whenever you provide such information, we are legally obliged to use your information in line with all laws concerning the protection of personal information, including the Data Protection Act 1998 (these laws are referred to collectively in this Privacy Policy as the "data protection laws").

Our websites may contain hyperlinks to websites owned and operated by third parties. These third party websites have their own privacy policies, including cookies, and we urge you to review them. They will govern the use of personal information, which you submit or which is collected by cookies whilst visiting these websites. We do not accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

Scope

This Policy applies to Tierra the directors, officers and employees of such entities as well as those acting for or on behalf of such entities.

Purpose

It is Tierra's policy to protect the confidentiality of personal data in compliance with applicable law.

Tierra may use this information for purposes such as:

- personalizing your experience at our websites;
- selectively sending you information that may be of interest to you;
- contests and sweepstakes;
- market research and on-line surveys;
- contacting you about warranty, service and sales issues; and
- automatic monitoring of statistical information to determine how Topcon's web sites are being used.

In addition to the above, Tierra will provide your personal information to the extent required in, or in connection with, any legal proceeding. Tierra also releases account and other personal information when we believe such release is appropriate in conjunction with Tierra's website Terms of Use and other agreements or to protect the rights, property or safety of Tierra's websites, our users or others. This includes exchanging information with others for fraud protection and credit risk reduction.



Information collected by Tierra

Tierra and its Joint Venture shall process the personal data belonging to employees, contractors, suppliers, customers and any other persons with whom a relationship of any kind is in place, in compliance with any applicable laws in force in the countries where Tierra and its Joint Venture are operating, as well as in order to create a “protected environment” in order to enable, when necessary, the transfer of the personal data between the companies operating in different countries, to the extent permitted and in compliance with security standards provided for by the applicable laws.

When you sign up to participate in or receive a service from Tierra S.p.A., such as services provided by Tierra, newsletters, competitions, magazine subscriptions, ordering products, readers' offers, live chats, message boards, surveys or online registration we may ask for personal information about you. This can consist of information such as your name, e-mail address, postal address, telephone or mobile number or date of birth. Different services or webpages may ask for different personal information. Personal data will be kept up to date and for no longer than it is necessary for the purposes for which the data was collected.

By entering your details in the fields requested, you enable Tierra S.p.A. and its service providers to provide you with the services you select.

Please note that sometimes on particular services (e.g. chat forums) you may be asked to provide or you may volunteer additional personal information and sometimes sensitive personal information (e.g. your political opinions, religious beliefs, sex life or health).

We may also use your IP address for some of our website services (please see our Cookies policy).

Privacy Principles

Tierra S.p.A. will use your personal information for a number of purposes including the following:

- Personal data shall be processed for legitimate purposes and in relation with business objectives (including, but not limited to, activities related to the recruiting of employees or marketing actions) in compliance with the principles of relevance, pertinence, and utilizing processing methods adequate to such objectives, as set out in section 5: When will Tierra S.p.A. contact me? below (e.g. to provide you with password reminders or to notify you that a particular service has been suspended for maintenance);
- Personal data processing shall be performed in compliance with processes and procedures provided for by the Group's system protection of company data, according to which all data is classified in order to determine and perform any and all necessary security measures;
- Sensitive data (including, without limitation, data that could allow the disclosure of political opinions, sexual orientation, racial origin, health condition, etc.) and “judicial data” processing operations shall occur only when strictly necessary to pursue Group business objectives and always in compliance with applicable laws, within the limits permitted by the applicable laws and, when necessary, upon the consent of the interested person;
- Each interested person is notified regarding the purposes of each processing operation of his/her personal data;
- For service administration purposes, which means that Tierra S.p.A. may contact you for reasons related to the service you have signed up for;
- The interested person's rights, such as, among others, the right to access his/her own personal data, the right to obtain the updating, rectification or integration of data, the right to cancel the data in cases provided for by the applicable laws, etc., shall be respected;
- When required by applicable laws, personal data may be disclosed to third parties, if necessary, in relation to processing purposes and subject to the interested person's consent.



- To personalize or improve the way Tierra S.p.A. content and advertising is presented to you online:
 - Tierra S.p.A. may collect your IP address (an IP address is a number that can uniquely identify a specific computer or other network device on the internet) and place cookies (see our Cookies Policy) for the purpose of improving our sites and enhancing your user experience, sometimes including the display of selected ads which are appropriate to your browsing pattern. This information is not used to develop a personal profile of you;
 - IP addresses may also be used to identify the location of users, the number of visits from different countries and also to block disruptive use;
 - to analyze and improve the services offered by a Tierra S.p.A. website, e.g. to provide you with the most user-friendly navigation experience;
- To manage our competitions and contact the winners;
- To meet product orders or requests for services or information; to process payments; and to keep our records up to date;
- Where you have specifically consented to be contacted for these purposes, to send you direct marketing by telephone, post or email about special offers and current or new products that you may be interested in;
- Where Tierra S.p.A. proposes using your personal information for any other uses we will ensure that we notify you first. You will also be given the opportunity to withhold or withdraw your consent for your use other than as listed above.

To whom will we pass on the data?

Generally, we will only use your information within the Tierra S.p.A. and its Joint Venture in order to provide the service/product you have requested. We will not pass your information to other members of the Tierra S.p.A. and its Joint Venture for marketing purposes unless you have consented to this.

We will only disclose your data to third party data processors with your consent or where we need to do so in order to provide a service. The data processors to whom we may pass your data will be Tierra S.p.A. and its Joint Venture companies and appropriately contracted third parties. Otherwise, we will keep your information confidential except where disclosure is required or permitted by law (for example to government bodies and law enforcement agencies).

Tierra S.p.A. will require all third party data processors to whom your information is disclosed to comply strictly with its instructions and Tierra S.p.A. will require that they do not use your personal information for their own business purposes.

Where we share your information with Joint Venture or affiliates and third party companies which are situated outside the UE countries we will ensure they treat your information with the same protection we do.

Discretion

Tierra S.p.A. may contact you:

- in relation to the functioning of any service you have signed up for in order to ensure that Tierra S.p.A. can deliver the services to you;
- in relation to any contribution you have made to any Tierra S.p.A. website, message board or other service;
- where you have opted to receive newsletters or other correspondence;
- to invite you to participate in surveys about Tierra S.p.A. services (participation is always voluntary);
- to carry out obligations arising from any contracts entered into between you and Tierra; and



- for marketing purposes where you have specifically agreed to this (see section 6: Will I be contacted for marketing purposes? below).

Our websites will give you detailed information about how Tierra S.p.A. will contact you in relation to specific services.

Marketing purposes

Tierra S.p.A. won't contact you for marketing purposes, or promote new services to you unless you agree to be contacted for these purposes.

Offensive or inappropriate content

If you post or send offensive, inappropriate or objectionable content anywhere on a Tierra S.p.A. website, or otherwise engage in any disruptive behaviour, Tierra S.p.A. may use your personal information to stop such behaviour.

Where Tierra S.p.A. reasonably believes that you are or may be in breach of the law (e.g. because content you have posted may be defamatory), Tierra S.p.A. may use your personal information to inform relevant third parties such as your employer, school e-mail/Internet provider or law enforcement agencies about the content and your behaviour.

Usage by user aged 16 or under

If you are aged under 18, please get your parent/guardian's permission before you provide personal information to Tierra Sp.A. Users without this consent are not allowed to provide us with personal information.

Personal information retention

We will hold your personal information on our systems for as long as is necessary for the relevant service, or as long as is set out in any relevant contract you hold with Tierra S.p.A. and its Joint Venture retention schedule. If you wish to cancel your registration with any of Tierra's websites, you may do so by following the "unsubscribe" instructions on the relevant website. If you change your profile to opt-out of receiving communications, your record may stay on the system so we can ensure that we do not contact you in the future.

Where you contribute to a Tierra S.p.A. service or website, Tierra S.p.A. will generally only keep your content for as long as is reasonably required for the purpose(s) for which it was submitted.

Personal information held by Tierra S.p.A.

Under the Data Protection Act you have the right to request a copy of the personal information Tierra S.p.A. holds about you and to have any inaccuracies corrected. We will use reasonable efforts to supply, correct or delete personal information about you on our files.

If you have any requests or questions about this or any other question about this Privacy Policy please see section 12: Contacting Tierra S.p.A. about this Privacy Policy at the bottom of this document or contact privacy@tierratelematics.com

Changes to Privacy Policy

This privacy policy may be updated from time to time so you may wish to check it each time you submit personal information to any Tierra S.p.A. service.

Contacting Tierra S.p.A. about this Privacy Policy

If you have any questions or comments about this Privacy Policy please contact: privacy@tierratelematics.com



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