

# CLARIOS Privacy Notice

revApril2026

CLARIOS, LLC and its affiliated companies (collectively "**CLARIOS**", "**we**", "**us**" or "**our**") care about your privacy and are committed to protecting your Personal Information in accordance with fair information practices and applicable data privacy laws.

## SECTIONS

1. Scope
2. Identity of the Data Controller
3. Categories of Personal Information
4. Legal Bases for Processing
5. Purposes of Processing
6. Recipients of Personal Information
7. International Transfers
8. Retention
9. Technical and Organizational Measures
10. Our Sites
11. Your rights
12. Consent and Withdrawal of Consent
13. How to exercise your Rights
14. Complaints
15. Automated Decision-Making
16. How to Contact Us
17. Data Protection Authority
18. Modifications to our Privacy Notice
19. Local Addenda for certain Countries/States

## 1. SCOPE

This Privacy Notice explains how we collect and use your Personal Information and what rights you have with respect to such processing of your data.

We collect Personal Information in various contexts through our business activities, including from our websites, customer portals, and mobile applications where Clarios' Terms of Use appear or are otherwise referenced (collectively, the "**Sites**").

This includes, for example, when you place orders or purchase products or services from us, enter into agreements or communicate with us, apply for an open job opportunity at Clarios, or use our Sites.

## TRANSLATIONS

This Privacy Notice is available in different languages. Please find all versions here: [Privacy Policy | Clarios](#)

## REGIONAL REQUIREMENTS

We have extended this global Privacy Notice with specific information for certain countries or regions. Please find such complementary information at the end of this document (see: Addenda section).

## SPECIFIC TERMS

Certain services, apps or portals that Clarios (or a Clarios group company) offers to a specific target group may be subject to a separate Privacy Notice. In such cases we will provide that specific Notice to the respective users separately.

We may also receive your Personal Information from our customers to perform services on their behalf.

Please note that “**Personal Information**” means any information relating to an identified or identifiable natural person; one who can be identified, directly or indirectly, by reference to an identifier such as name, username and password, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

## 2. IDENTITY OF THE DATA CONTROLLER

**Clarios, LLC.**, Florist Tower, 5757 N. Green Bay Ave., Glendale, WI 53209-4408, USA, is the provider of the website [www.clarios.com](http://www.clarios.com) and responsible for the processing of Personal Information in connection with the use of that website.

To identify the CLARIOS entity(ies) responsible for the processing of your Personal Information for other matters, please check the information provided on our specific Site, ask your CLARIOS business contact, consult the list of our locations on the CLARIOS public website ([www.CLARIOS.com](http://www.CLARIOS.com)), or contact our Privacy Office at [privacyoffice@clarios.com](mailto:privacyoffice@clarios.com).

## 3. CATEGORIES OF PERSONAL INFORMATION

Personal Information that we may collect and process includes:

- **Contact Information** that allows us to communicate with you, such as your name, job title, age and prefix, username and password, mailing address, telephone numbers, email address or other addresses that allow us to send you messages, company information and registration information you provide on our Sites.
- Personal information when you **apply for employment** and/or participate in our recruitment processes through our job application portal, external portals, HR consultants or direct communication. This data may include the following categories of your data: contact, demographic, communications, educational, professional, employment, social media/website, network/device, recruiting system usage/interaction, security and preference information.
- **Relationship Information** that helps us do business with you or provide you with product information, such as the types of products and services that may interest you, contact and product preferences, languages, creditworthiness, marketing preferences and demographic data.
- **Transactional Information** about how you interact with us, including purchases, inquiries, customer account information, order and contract information, delivery details, data collected for our e-warranty program (if offered in your region), billing and financial data, details for taxes, transaction and correspondence history, and information about how you use and interact with our Sites.
- **Security and Compliance Information** that helps us to secure our interests, including information for conflict checks, fraud prevention and internal verification, as well as information necessary for the security of our premises, such as visual recordings.
- **Behavioural Information** that helps us and our partners create inferred or assumed details relating to your behaviour and interests, based on your online and/or social media activity. This is often collated and grouped into “segments” (e.g., there may be a segment for people living in London and aged under 25, who like sports), and is often associated with certain elements of your Technical Information (see below)).
- **Technical Information** about your systems and devices. Such technical information is information that does not, by itself, identify a specific individual but which could be used to indirectly identify you. Our servers may automatically record this information, which may include your Internet Protocol (“IP”) address, browser type, browser language, time zone setting and location, and the date and time of your request. Gathering your information helps us ensure our Sites work correctly and support our customer analytic efforts. This is often collected by, and associated with, the Cookies and other technologies further explained in Section 10 “Our Sites”.

If you download our **mobile applications** from your **app stores** certain data is transmitted to the app store operator (e.g. username, email address, payment/purchase data, device identification number and static identifiers). Please note that the responsibility for the processing of that data lies with the app store operator. Different data collection practices may apply depending on the operating system you are using (such as Android or iOS).

- Our **products**, including our connected batteries, may collect **status, system and event information** relating to their setup, configuration, and operation, as well as information collected by our products in their ordinary course of operation. The nature and extent of the information collected by our products will vary based on the type and function of the product and the type of services for which they are used, subject to applicable laws. Such data may include the related vehicle identification number, vehicle licence plate, vehicle driver contact data, geolocation/GPS data, and battery usage data.

Please note that in addition to Personal Information we collect from you directly, we may also receive certain of the Personal Information outlined above from third-party sources and combine Personal and non-personal Information, collected online and offline. For example, a business partner may share your Contact Information with us if you have expressed interest in learning specifically about our products or services, or the types of products or services we offer. We also obtain your Personal Information from other third parties, such as the technical and behavioural information we receive from our marketing/advertising partners, publicly available sources, public relation service providers and data providers/brokers (subject to applicable laws).

#### 4. LEGAL BASES FOR PROCESSING

We are only processing your Personal Information if we have a legal basis for that. Depending on the necessity of the relevant processing activity and its related Purpose (see Section 5 “Purposes of Processing”) for which we use your Personal Information either of the following legal bases will apply:

- The **performance of a contract** we have with you, or to take steps requested by you before entering into a contract (e.g., a contract to provide you with our services/products).
- Compliance with our **legal obligations** under applicable law.
- Your **consent** to the processing of your data for the specific purpose (where required, and subject to the applicable law).
- The **legitimate interests** pursued by CLARIOS or by a third party, unless overridden by your interests or fundamental rights and freedoms.
- To **protect the vital interests** of you or another person.
- To perform a task carried out in the **public interest**.

If you want to be informed about the specific legal basis we rely on to process your Personal Information for a particular purpose, you may ask your CLARIOS business contact or contact our Privacy Office ([privacyoffice@clarios.com](mailto:privacyoffice@clarios.com)).

#### What happens when you do not provide the necessary Personal (where needed)?

In certain circumstances, we need to process your Personal Information either to comply with our legal obligations under applicable law, or to perform the terms of the contract we have (or are trying to enter into) with you. In these circumstances, where you fail to provide that necessary Personal Information when requested, we may not be able to perform the contract we have (or are trying to enter into) with you so that you will not be able to receive our products or services.

#### 5. PURPOSES OF PROCESSING

We are processing your Personal Information for the following purposes:

- Providing you with product information, recommending products and services that might be of interest to you, sending you marketing and advertising messages such as newsletters, announcements, or special offers or notifying you about our upcoming events or trainings.
- Fulfilling your orders for products or services and related activities, such as product and service delivery, customer service, account and billing management, support and training, product update and safety related notices, and to provide other services related to your purchase.
- Managing our contractual obligations and your ongoing relationship with us, including interacting with you, analyzing and improving the products and services we offer or purchase, informing you about related products or services, as well as special offers and promotions.
- Reviewing your job application data to assess whether you qualify as a potential CLARIOS employee for a specific position. We may use your job candidate Personal Information for the purposes of (i) tracking interactions with our recruiting system; (ii) carrying out, analyzing and improving our application and recruitment process, including assessing you and your application and conducting employment, background and reference checks; (iii) establishing an employment relationship or entering into an employment contract with you; (iv) complying with our legal, regulatory and corporate governance obligations; (v) recordkeeping; and (vi) as otherwise required or permitted by applicable law. In case you allow us (through consent) to

process your job application data for future positions, too, we will keep your data in our talent pool in line with the applicable storage periods so that we may consider you for such positions at CLARIOS, too.

- o Ensuring the security of our Sites, services, property and premises, as well as protecting us against fraud.
- o Managing our everyday business needs, such as payment processing and financial account management, product development, contract management, marketing/advertising, Site and e-communication administration, corporate governance, audit, reporting, fraud prevention and legal compliance.

## 6. RECIPIENTS OF PERSONAL INFORMATION

Depending on the processing activity and related purpose we may be sharing your Personal Information with other parties.

- o **Affiliates:** CLARIOS is a global company group comprising different brands, affiliates and subsidiaries in many regions of the world. We may transfer to and share your Personal Information with CLARIOS affiliates where needed, in compliance with the applicable laws and our intragroup data transfer and processing terms.
- o **As Required by Law:** We may also make Personal Information concerning individuals available to public or judicial authorities, law enforcement personnel and agencies to the extent required by mandatory law and including to agencies and courts in the countries where your information is stored, which may be outside your home country. Where permitted by law, we may also disclose such information to third parties (including legal counsel) when necessary for the establishment, exercise, or defence of legal claims or to otherwise enforce our rights, protect our property or the rights, property or safety of others, or as needed to support external audit, compliance and corporate governance functions. We may also disclose Personal Information in the event of an emergency that threatens an individual's life, health, or security.
- o **Job candidate data:** CLARIOS may share your candidate Personal Information with (i) internal personnel who have a need to know such information in order to perform their related tasks, including individuals of our HR, finance and legal teams, and who may be working at different CLARIOS affiliates in different countries due to our matrix organization; and (ii) CLARIOS's service providers, including providers of background checks, staffing services, and cloud services.
- o **Vendor / service providers:** We may share Personal Information with third-party vendors and service providers that work with CLARIOS. We may share Personal Information with these vendors and service providers to support us in the processing of data as described in this Privacy Notice and to help us provide a product or service to you. This may include the sharing of your data with workshops and retailers of CLARIOS products in your region to allow them to assess the age and status of your product or verify your warranty claim. Any processing of that Personal Information will be on our instructions and compatible with the original purposes.
- o **Mergers & Acquisitions:** CLARIOS may buy or sell/divest/transfer your Personal Information including your name or email address in the course of corporate divestitures, mergers, acquisitions, bankruptcies, dissolutions, reorganizations, liquidations, or general business transactions or proceedings.

## 7. INTERNATIONAL TRANSFERS

The third parties, subsidiaries, and affiliates to which your Personal Information can be disclosed may be located throughout the world; therefore, information may be transferred to countries/states having different privacy protection standards than your country/state of residence, including but not limited to the USA where our global headquarters and other major group companies are located.

To protect your Personal Information, we will only transfer data to countries who provide an adequate level of Personal Information protection. If the data is transferred to countries without adequate protection, we will use additional safeguards to ensure your data is protected.

In case of transfer of Personal Information from the European Economic Area (EEA) to such third countries we typically apply the EU Commission approved Standard Contractual Clauses (**SCC**) to protect your Personal Information, unless other GDPR compliant safeguards apply. If you wish to receive a copy of these Standard Contractual Clauses, you can ask your CLARIOS business contact or contact our Privacy Office ([privacyoffice@clarrios.com](mailto:privacyoffice@clarrios.com)).

Circumstances in which we may transfer your Personal Information to an overseas recipient include:

Recipient of Personal Information	Type of Personal Information	Purpose of Processing	Method of Processing	Contact Information
Clarios, LLC (USA)	<ul style="list-style-type: none"> <li>Name,</li> <li>location</li> <li>email address, date of birthday</li> <li>certificates, working experience, education information, candidate picture</li> </ul>	<p>Process job applications.</p> <p>Build the company's talent pool, globally.</p>	Store candidate information in the talent pool and allow the company to retrieve such Personal Information when there is a hiring need.	<a href="mailto:privacyoffice@clarios.com">privacyoffice@clarios.com</a>
Clarios, LLC (USA)	<ul style="list-style-type: none"> <li>Name,</li> <li>employer name</li> <li>job title</li> <li>business contact data (address, email, phone)</li> </ul>	<p>Manage and administer the CLARIOS business-to-business direct and indirect customer relation data in a central tool.</p> <p>Manage customer product information, training and marketing campaigns.</p>	Store direct and indirect customer contact data in a central data base.	<a href="mailto:privacyoffice@clarios.com">privacyoffice@clarios.com</a>
Clarios, LLC (USA)  <i>(not applicable to data of individuals located in China)</i>	<ul style="list-style-type: none"> <li>Name</li> <li>contact data (address, email, phone)</li> <li>battery and vehicle data</li> </ul>	<p>Manage and administer the CLARIOS business-to-consumer relation data in a central tool.</p> <p>Manage customer product information, e-warranty data and marketing campaigns.</p>	Store customer contact data in a central data base.	<a href="mailto:privacyoffice@clarios.com">privacyoffice@clarios.com</a>

## 8. RETENTION

We will retain your Personal Information as long as reasonably necessary to achieve the purpose for which it was collected. Usually, this storage period lasts for the duration of any contractual relationship and for any period thereafter as legally required or permitted by applicable law following which your data will be erased. In case processing of your data is based on your consent, your data will also be erased in case of a withdrawal of your consent.

## 9. TECHNICAL AND ORGANIZATIONAL MEASURES

We maintain a comprehensive information security program that is proportionate to the risks associated with the processing. The program is continuously adapted to mitigate operational risks and to protect Personal Information, considering industry-accepted practices.

Accordingly, we apply appropriate technical, physical and organizational measures that are reasonably designed to protect Personal Information against accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access, and against other unlawful forms of processing. Access to Personal Information is restricted to authorized recipients on a need-to-know basis. We will also use enhanced security measures when processing any sensitive Personal Information.

In some instances, we process Personal Information on behalf of our customers as their service provider (in a data processor capacity). We collect and process such Personal Information only as instructed by our customer and will not use or disclose it for our own purposes. We maintain information security controls to protect such data and will only disclose or transfer the Personal Information as instructed by the customer and to provide the requested service. Unless otherwise instructed by the customer, we are treating such Personal Information in line with our commitments on disclosure, transfer and security as set forth in this Privacy Notice.

Please understand, however, that the above-mentioned security measures cannot prevent all loss, misuse or alteration of Personal Information and that, to the fullest extent permitted by law, we are not responsible for any damages or liabilities relating to any such incidents that occur despite of the security measures we have taken. Where required under the applicable law, we will notify you of any loss, misuse or alteration of Personal Information in case you may be affected so that you can take the appropriate actions for the due protection of your data and your rights. CLARIOS also reviews its security procedures periodically to consider appropriate new technology and updated methods.

## 10. OUR SITES

### o **Cookies, usage data and similar tools**

When you visit our Sites we may process/collect certain information by automated means, using cookies, pixel tags, browser analysis tools and similar technologies (hereinafter referred to as "**Cookies**"), some of which are provided by third parties, to enable website features and functionality; measure, analyze, and improve site performance; enhance user experience; record user sessions and interactions; personalize content; and support our advertising and marketing. We and our third-party vendors may monitor, record, and access information and data, including device data, IP address and online identifiers, referring URLs and other browsing information, for these and similar purposes.

**Categories:** These Cookies can be categorized as follows:

- o **Essential Cookies** are required to activate the core functionality of the respective Site. These Cookies cannot be denied or de-activated.
- o **Functional Cookies** enable us to analyze usage behavior in order to measure and improve performance.
- o **Marketing Cookies** are used by advertisers to serve ads that may be relevant to your interests.

**Consent Management:** Please note that our Sites provide for a consent management platform (hereinafter referred to as "**Cookie Banner**") which allows you to deny or accept Functional Cookies and Marketing Cookies. Our Cookie Banner also provides you with information about each of the individual Cookies used on that Site, as well links to our Privacy Notice and the Terms of Use of that Site. In case our Cookie Banner does not pop-up when you open our Site, please click the privacy button on that Site, or delete your browser history and refresh our Site.

Some **web browsers** also provide you with the option to block Cookies or browse without sharing your data when using your browser's anonymous usage setting. Please refer to your browser instructions to learn more about how to adjust or modify your browser settings. Please note that if you disable your web browser's Cookies and other technologies, certain features of our Sites and services may be disabled, and the functionality we would like to provide when you visit our Site may be limited.

- o **Google Analytics:** We may use Google Analytics services provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, California 94043, USA, on our website to collect information about your online activity on our websites, such as the web pages you visit, the links you click, and the searches you conduct on our websites. We may use the information to compile reports and to help us improve the website. The Cookies used for that service collect information in an anonymous form, including the number of visitors to the website, where visitors have come to the site from and the pages they visited. The information generated by those Cookies and your current IP-address will be transmitted by your browser to and will be stored by Google on servers in the United States and other countries. Google will use this information on our behalf for the purpose of evaluating your use of our website as described above. The IP address collected through Google Analytics will not be associated with any other data held by Google. For more information about the information gathered using Google Analytics please visit [Safeguarding your data - Analytics Help](#).

You can prevent these Cookies by selecting the appropriate settings on your browser and/or the Cookie Banner of our respective Site. You may download and install the Google Analytics opt-out browser add-on available here: [Google Analytics Opt-out Browser Add-on Download Page](#).

- o **Google Remarketing Technology:** Our websites may use Google's remarketing technology. This technology enables users who have already visited our online services and shown interest in our services to see targeted advertising on the websites of the Google partner network. Likewise, users that are similar to the visitors of our website can be addressed. I.e., using Cookies, the user behavior on a website can be analyzed and subsequently utilized to provide targeted product recommendations and advertising based on the user's interests. The

information generated about the website use will be transmitted to and stored on servers in the United States by Google. Where the IP address is transferred, it will be reduced by the last 3 digits.

If you would prefer to not receive any targeted advertising, you may deactivate the use of Cookies for these purposes through Google by visiting their website: [Ad Settings](#). Please note that Google has its own data privacy policy which is independent of our own. We assume no responsibility or liability for their policies and procedures. Please read Google's privacy policy before using our Sites [Privacy Policy – Privacy & Terms – Google](#).

- **Meta Conversion Tracking:** Our Sites may utilize the Conversion Tracking Pixel service of Meta Platforms, Inc., 1 Meta Way, Menlo Park, CA 94024, USA ("**Meta**"). This tool allows us to follow the actions of users after they are redirected to a provider's website by clicking on a Meta advertisement. We are thus able to record the efficacy of Meta advertisements for statistical and market research purposes. The collected data remain anonymous. This means that we cannot see the Personal Information of any individual user. However, the collected data are saved and processed by Meta. Meta is able to connect the data with your Meta account and use the data for their own advertising purposes, in accordance with Meta's Data Use Policy to be found in Meta's privacy center: [Meta | Privacy Center](#). Meta Conversion Tracking also allows Meta and its partners to show you targeted advertisements on and outside Meta. In addition, a Cookie will be saved onto your device for these purposes.
- **Identity Based Marketing (Google Customer Match; Meta Custom Audience):** For the marketing of certain of our products/services in certain regions we may be using identity-based marketing services offered by Google and/or Meta (*please find the full company name and address data of those two providers above*), such as Google Customer Match and Facebook Custom Audience. When using those services, we are sharing our customer contact data with those providers so that they reach and re-engage with our customers and similar target groups on the providers' sites (i.e. Google sites, Meta sites (including Facebook and Instagram)) through targeted marketing. Please note that your data will be protected during transfer and processing through encryption and hashing. Those providers will only use Personal Information of individuals whose contact data matches the data of their own customers (i.e. individuals having a Google or Meta account).

We are using those service in accordance with the applicable privacy laws which, depending on where you are located, may require us to: obtain your explicit consent before sharing your data with those providers; and/or allow you to opt-out of such sharing of your data; and/or sign a data processing agreement with those providers before data sharing; and/or share your data with Meta in Europe only (i.e. Meta Platforms Ireland Limited, Merrion Road, Dublin 4, D04 X2K5, Ireland).

For more details, please see this information provided by Google and Meta:

- [Facebook](#)
- [How Google uses Customer Match data - Google Ads Help](#)

- **Linked sites:** We may provide links to third parties' websites ("**linked sites**") from our Sites. Each linked site may have its own terms of use and privacy notice, and users must be familiar and comply with all such terms when using linked sites. We are not responsible for the policies and practices of any linked site, or any additional links contained in them. These links do not imply our endorsement of the linked sites or any company or service, and we encourage users to read these linked sites' terms and notices prior to using them. In addition, you may have visited our Sites through a link or a banner advertisement from another site. In such cases, the site you linked from may collect information from people who click on the banner or link. You may want to refer to the privacy policies on those sites to see how they collect and use this information.
- **Children:** Our Sites are not directed at children, and we do not use our Sites to knowingly solicit Personal Information from or market to children. If we learn that a child has provided Personal Information through one of our Sites, we will remove that information from our systems. Adults who interact with CLARIOS should take care not to provide any information about children.

## 11. YOUR RIGHTS

You are entitled to use the following rights with respect to your Personal Information that is processed by us. (Certain additional conditions or limitations may apply depending on the specific applicable law. Please also see the local Addenda section at the end of this document.):

- Request **access** to your Personal Information. This enables you to obtain confirmation from Clarios as to whether Personal Information concerning you is being processed by us, and, if so,

to access that Personal Information and obtain additional information allowing you to check whether we are lawfully processing that data.

- Request **rectification** of the Personal Information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected by us.
- Request **erasure** of your Personal Information. This enables you to ask us to delete or remove Personal Information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Information where you have exercised your right to object to processing (see Section 12 “Consent”).
- Request the **restriction of processing** of your Personal Information. This enables you to ask us to suspend the processing of Personal Information about you, for example if you want us to establish its accuracy, lawfulness or the reason for processing it.
- Request the **transfer of your Personal Information**. You may request us to provide to you, or to a third party you have chosen, your Personal Information in a structured, machine-readable format. Please note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

## 12. CONSENT AND WITHDRAWAL OF CONSENT

By providing Personal Information to us, you understand and agree to the collection, processing, international transfer and use of such information as set forth in this Privacy Notice. Where required by applicable law we will ask for your explicit consent.

You may always object to the use of your Personal Information for direct marketing purposes or withdraw any consent previously granted for a specific purpose, free of charge by clicking on relevant links on our Sites (where available), following the directions contained in an email, or by contacting our Privacy Office at [privacyoffice@clarios.com](mailto:privacyoffice@clarios.com).

## 13. HOW TO EXERCISE YOUR RIGHTS

If you want to exercise any of the rights described above, please contact [privacyoffice@clarios.com](mailto:privacyoffice@clarios.com).

Typically, you will not have to pay a fee to access your Personal Information (or to exercise any of the other rights). However, except in relation to Withdrawal of Consent (see Section 12, above), we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive, or, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Information (or to exercise any of your other rights). This is a security measure to ensure that Personal Information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to verify or enhance our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 14. COMPLAINTS

If you would like to make a complaint regarding this Privacy Notice or our practices in relation to your Personal Information, please contact [privacyoffice@clarios.com](mailto:privacyoffice@clarios.com). All complaints will be evaluated, and a reply will be sent as soon as appropriate.

Independent from that, or if you feel that your complaint has not been adequately resolved, please note that you may contact your local data protection supervisory authority (please see Section 17 “Data Protection Authority”).

## 15. AUTOMATED DECISION-MAKING

Please note that we do not currently make any decisions about you based solely on automated processing (a term which includes profiling techniques) which produce legal (or similarly significant) effects concerning you.

CLARIOS respects your rights under law regarding automated decision-making. So, if we do start engaging in such automated decision-making processes, we will update this Privacy Notice, accordingly, as well as any additional privacy information for the specific processing activity and respect your right to object to being subject to automated individual decision-making.

## 16. HOW TO CONTACT US

If you would like to communicate with us regarding privacy issues or have questions, comments or complaints, please contact our Privacy Office at [privacyoffice@clarios.com](mailto:privacyoffice@clarios.com).

## 17. DATA PROTECTION AUTHORITY

The following supervisory authorities are responsible for monitoring data protection by Clarios, LLC., located in Glendale, WI, USA (our global headquarters):

- o **on Federal level:** the Federal Trade Commission (FTC) - enforcing privacy and data security under consumer protection laws.
- o **on State level:** the Wisconsin Attorney General, under state consumer protection statute.

Due to the global presence of CLARIOS in multiple countries and jurisdictions we cannot provide you with the specific authority contacts for all other Clarios affiliates and group companies here. Please contact us (per the Section above) in case you need the contact data of the competent data protection authority in charge of your questions or concerns.

## 18. MODIFICATIONS TO OUR PRIVACY NOTICE

We reserve the right to change, modify, and update this Privacy Notice at any time. Please check periodically to ensure that you have reviewed the most current notice.

## 19. LOCAL ADDENDA FOR CERTAIN COUNTRIES/STATES

Specific additional rights and obligations may apply in case you are located in a specific country or region. Accordingly, we have extended this Privacy Notice with specific information for such countries/regions in accordance with the applicable laws.

**Below** please find our respective regional **Addenda** to this Privacy Notice.

Apart from that, certain services or Sites that Clarios (or a Clarios group company) offers to a specific target group may be subject to a separate Privacy Notice due it is specific way of processing Personal Data. In such cases we will directly provide the respective users with the dedicated privacy notice.

### A. CALIFORNIA

Under the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA), residents of the US State of California have certain rights with respect to their Personal Information that is processed by Clarios. If you are a California resident, you may exercise the following rights regarding your Personal Information, subject to certain exceptions and limitations:

- o **Right to give you access**, in a portable and (if technically feasible) readily usable form, to the specific pieces and categories of Personal Information we have collected about you, and to obtain information about how we collect this information, our purpose in collecting it, and the types of parties we may have disclosed it to;
- o **Right to** have the Personal Information we have collected from you **deleted** under certain circumstances; and
- o **Right to opt-out** of our sale(s) of your Personal Information, if applicable (“do not sell my data”).

As a Californian resident, you will not receive discriminatory treatment for exercising your privacy rights. Specifically, if you exercise your rights, we will not deny your services, charge you different prices for services, or provide you with a different level or quality of services. Please note that you must verify your identity before further action is taken.

You may also designate an authorized agent to make a privacy request on your behalf.

### B. MEXICO

In accordance with the Federal Law on Protection of Personal Data Held by Private Parties (“Ley Federal de Protección de Datos Personales en Posesión de los Particulares”) and its regulations, CLARIOS acknowledges and safeguards your rights as a data subject in Mexico. This Addendum complements our global Privacy Notice by outlining how your personal data is managed in compliance with Mexican law.

- a) CLARIOS, as the responsible entity (“**Responsible**”), collects and processes personal data for purposes outlined in the main Privacy Notice, including providing services, responding to inquiries, and meeting legal requirements. Personal data may comprise identification, contact, financial, and sensitive information, as needed.

- b) Since we generally do not require your financial or sensitive personal data, we will rely on your tacit **consent**, having made available this privacy notice you. Sensitive personal data is only collected and processed when strictly necessary, with your express consent and always in line with the law.
- c) You have the right to object to the processing of your personal data when it is subject to **automated processing** that produces undesired legal effects and is intended to evaluate, without human intervention, certain personal aspects of the data subject. We will also provide you with a mechanism that may allow you to manifest your refusal to the processing of your personal information for any secondary purpose of processing.

You have the right to **access, rectify, cancel, or oppose (“ARCO” rights)** the processing of your personal information, and to withdraw your consent at any time. To exercise these rights, please reach out to our Privacy Office at [privacyoffice@clarios.com](mailto:privacyoffice@clarios.com). Requests should include sufficient details to identify you and specify the rights you wish to exercise. CLARIOS will respond within the period established by Mexican law.

If your request is particularly complex or if you have submitted multiple requests, we may extend this period once for an additional twenty (20) days, provided that we notify you of the reasons for the extension within the original response period, in accordance with Mexican law.

If you believe your rights have been violated, you may file a complaint with Mexico’s new data protection authority, the Secretariat for Anti-Corruption and Good Governance.

d) **LTH Tecnico MobileApp:**

Our LTH Tecnico MobileApp may collect and process your location data, including:

- i. **precise location** (GPS); and
- ii. **approximate location** (network/Wi-Fi based),

when needed to provide delivery technician features.

**How We Use Location Data:** We use your location data to:

- i. assign and optimize nearby service jobs;
- ii. support technician workflow during active and ongoing services;
- iii. improve operational performance, security, and fraud prevention; and
- iv. troubleshoot service and app issues.

**Background Location:** If you grant “Always” location permission, the app may access location in the background to support service assignment and ongoing delivery/service operations even when the app is not open.

**Legal Basis / Consent:** We process location data based on your permission/consent and our legitimate business interest in providing core app functionality. You can withdraw consent at any time by changing device permissions.

**Sharing of Location Data:** We may share location data with service providers that help us operate the app (for example, cloud hosting, analytics, mapping, and operational systems), under contractual confidentiality and data protection obligations. We do not sell your location data.

**Retention:** We retain location data only as long as necessary for the purposes described in this policy and to comply with legal obligations, then delete or de-identify it.

**Your Choices:** You can manage location permissions at any time in your device settings:

- i. iOS: Settings > Privacy & Security > Location Services > LTH Tecnico
- ii. Android: Settings > Apps > LTH Tecnico > Permissions > Location

If you deny location access, some app features may not work properly.

**Security:** We apply reasonable technical and organizational safeguards, including encryption in transit where applicable, to protect location data.

**Contact Us:** For privacy questions or requests, contact: [privacyoffice@clarios.com](mailto:privacyoffice@clarios.com).

**Data Controller:** Clarios, LLC., address: Florist Tower, 5757 N. Green Bay Ave., Glendale, WI 53209-4408, USA

- e) CLARIOS will inform you of any significant changes to this Privacy Notice or its addenda through our website or other communication channels. We remain committed to

maintaining the highest standards of data protection and transparency required under Mexican law.

### **C. JAPAN**

Details of the CLARIOS entity collecting personal data in Japan:

CLARIOS Japan GK  
Izumi-kan Kioicho Building, 4-3, Kioicho, Chiyoda-ku, Tokyo  
Authorized signatory: Chris Courts, Executive Manager

version: April2026