

## **ESTERLINE TECHNOLOGIES CORPORATION** **PRIVACY AND COOKIES STATEMENT**

This Privacy and Cookies Statement ("**Privacy Statement**") describes how Esterline Technologies Corporation and its subsidiaries (listed [here](#)) (collectively, "**Esterline**") collects, uses, shares, and otherwise processes individually identifiable information about visitors to our websites, as well as contact persons of our corporate customers, vendors, and suppliers ("**Personal Data**"). This Privacy Statement applies to Personal Data that we collect through our Internet sites as well as through trade shows, seminars, conferences, and other offline means.

### **SUMMARY OF KEY POINTS**

<b>Collection</b>	As a business-to-business (" <b>B2B</b> ") organization, we collect name, contact details, and other Personal Data related to our commercial relationships. <a href="#">Click here to learn more.</a>
<b>Use</b>	We use Personal Data to perform transactions and respond to inquiries, to manage accounts and maintain business operations, to provide relevant marketing, and to fulfill other business and compliance purposes. <a href="#">Click here to learn more.</a>
<b>Sharing</b>	We share Personal Data as necessary to perform transactions, respond to requests, and to fulfill other business and compliance purposes. <a href="#">Click here to learn more.</a>
<b>Marketing choices</b>	You have control over how we use Personal Data for direct marketing. <a href="#">Click here to learn more.</a>
<b>Cookies</b>	We use cookies on our website, and provide choices on use of cookies, including third party targeting and advertising. <a href="#">Click here to learn more.</a>
<b>Data subject rights</b>	You have certain rights to request access, rectification, deletion, or other actions regarding your Personal Data where required by applicable law. <a href="#">Click here to learn more.</a>
<b>Information security</b>	We maintain reasonable technical and organizational measures to protect Personal Data from loss, misuse, alteration, or unintentional destruction. <a href="#">Click here to learn more.</a>
<b>Cross-border transfers</b>	We provide appropriate protections for cross-border transfers where specified by law. <a href="#">Click here to learn more.</a>
<b>Other issues</b>	We provide other information in this Privacy Statement about: (i) the legal basis for collecting and processing Personal Data, (ii) the consequences for not providing Personal Data, (iii) automated decision-making, (iv) do-not-track (DNT) signals, (v) data retention, (vi) links to third party websites, (vii) employee and contractor issues; and (viii) changes to this Privacy Statement. <a href="#">Click here to learn more.</a>
<b>Contact us</b>	Please contact us as detailed below with any questions. <a href="#">Click here to learn</a>

[more.](#)

**1. COLLECTION OF PERSONAL DATA.** We collect the following categories of Personal Data:

- **Basic Information:** Name, title, company, region, job responsibilities, phone number, mailing address, email address, contact details, and any other Personal Data that you submit to us during the course of correspondence with us.
- **Registration Information:** Newsletter and/or other alert requests, subscriptions, downloads, and registration to seminars, courses, or conferences.
- **Marketing Information:** Data about individual participation in trade shows, seminars, and conferences, credentials, associations, product interests, query information, and preferences.
- **Job Applicant Information:** Data provided by job applicants or others on our website or offline means in connection with employment opportunities. Additional notice will be provided via separate privacy statement(s) where applicable.
- **Compliance Information:** Government identifiers and other trade compliance and due diligence data, to the extent required and permitted by applicable law.
- **Transaction Information:** Transaction history, payment details, and performance data.
- **Device Information:** Computer Internet Protocol (IP) address, unique device identifier (UDID), cookies and other data linked to a device, and data about usage of our website (Usage Information). Note, however, we do not consider Device Information to be Personal Data except where we can link it to you as an individual or where applicable law provides otherwise.

**2. USE OF PERSONAL DATA.** We use the above categories of Personal Data for the following purposes:

Purpose of Use	Categories of Personal Data
Perform transactions and respond to your inquiries	Basic Information, Registration Information, Transaction Information, and Device Information
Manage your accounts and maintain our business operations	Basic Information, Registration Information, Transaction Information, and Device Information
Make our website more intuitive and easy to use and conduct research regarding opinion of customer services	Device Information, Basic Information, Registration Information
Protect the security and effective functioning of our website and information technology systems	Basic Information, Registration Information, Transaction Information, and Device Information
Provide relevant marketing	Basic Information, Registration Information, Device Information, Transaction Information, and Marketing Information
Address our compliance and legal obligations and exercise our legal rights	Basic Information, Registration Information, Compliance Information, Transaction Information, and Device Information
Consider individuals for employment and contractor opportunities and manage on-boarding procedures	Job Applicant Information

**3. SHARING OF PERSONAL DATA.** We may share Personal Data with the following categories of recipients:

- **Esterline:** We share Personal Data within the Esterline group of affiliates and subsidiaries as necessary for the purposes identified above. As noted above, the list of affiliates and subsidiaries within the Esterline group is provided [here](#).
- **Suppliers and service providers:** We share Personal Data with suppliers and service providers, acting as data processors, to enable such parties to perform functions on our behalf and under our instructions in order to carry out the purposes identified above (e.g., information technology services, human resources management services, statistical analysis). We require such parties by contract to provide reasonable security for Personal Data and to use and process such Personal Data only on our behalf. A limited number of service providers will act as data controllers (e.g., carriers) and will be contractually obligated to comply with applicable data protection laws, rules, and regulations.
- **Auditors, advisors, and financial institutions:** We share Personal Data with auditors for the performance of audit functions, and with advisors for the provision of legal and other advice, and with financial institutions in connection with payment and other transactions.
- **Business reorganization:** We share Personal Data with any corporate purchaser or prospect to the extent permitted by law as part of any merger, acquisition, sale of company assets, or transition of service to another provider, as well as in the event of insolvency, bankruptcy, or receivership in which Personal Data would be transferred as an asset of Esterline.
- **Mandatory disclosures and legal rights:** We share Personal Data in order to comply with any subpoena, court order or other legal process, or other governmental request. We also share Personal Data to establish or protect our legal rights, property, or safety, or the rights, property, or safety of others, or to defend against legal claims or prevent fraud.

If you have questions about the parties with which we share Personal Data, please contact us as specified below.

**4. MARKETING CHOICES.** You have control regarding our use of your Personal Data for direct marketing. If you no longer wish to receive any marketing communications, remain on a mailing list to which you previously subscribed, or receive any other marketing communication, you can choose to not receive such communications at any time. Please follow the unsubscribe link in the relevant communication or contact us as detailed below.

**5. COOKIES.** We use and allow certain third parties to use cookies, web beacons, and similar tracking technologies (collectively, "**cookies**") on our website.

*What are cookies?*

Cookies are small amounts of data that are stored on your browser, device, or the page you are viewing. Some cookies are deleted once you close your browser, while other cookies are retained even after you close your browser so that you can be recognized when you return to a website. More information about cookies and how they work is available at [www.allaboutcookies.org](http://www.allaboutcookies.org).

*How do we use cookies?*

We use cookies to provide the website and services, gather information about your usage patterns when you navigate this website in order to enhance your personalized experience,

and to understand usage patterns to improve our website, products, and services. We also allow certain third parties to place cookies on our website in order to collect information about your online activities on our website over time and across different websites that you visit. This information is used to provide advertising tailored to your interests on websites you visit, also known as interest-based advertising, and to analyze the effectiveness of such advertising.

Cookies on our website are generally divided into the following categories:

- **Strictly Necessary Cookies:** These are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas. These cookies are session cookies that are erased when you close your browser.
- **Analytical/Performance Cookies:** These allow us to recognize and count the number of users of our website and understand how such users navigate through our website. This helps to improve how our website works, for example, by ensuring that users can find what they are looking for easily. These cookies are session cookies which are erased when you close your browser. We use Google Analytics, and you can see below for how to control the use of cookies by Google Analytics.
- **Functional Cookies:** These improve the functional performance of our website and make it easier for you to use. For example, cookies are used to remember that you have previously visited the website and asked to remain logged into it. These cookies qualify as persistent cookies, because they remain on your device for us to use during your next visit to our website. You can delete these cookies via your browser settings.
- **Targeting Cookies:** These record your visit to our website and the pages you have visited and the links you have followed to recognize you as a previous visitor and to track your activity on the website and other websites you visit. These cookies qualify as persistent cookies, because they remain on your device for us to use during your next visit to our website. You can delete these cookies via your browser settings. See below for further details on how you can control third party targeting cookies.

*What are your options if you do not want cookies on your device?*

You can review your Internet browser settings, typically under the sections "Help" or "Internet Options," to exercise choices you have for certain cookies. If you disable or delete certain cookies in your Internet browser settings, you might not be able to access or use important functions or features of this website, and you may be required to re-enter your log-in details.

To learn more about the use of cookies for Google analytics and to exercise choice regarding such cookies, please visit <https://tools.google.com/dlpage/gaoptout>.

To learn more about certain cookies used for interest-based advertising by third parties, including through cross-device tracking, and to exercise certain choices regarding such cookies, please visit the [Digital Advertising Alliance](#), [Network Advertising Initiative](#), [Digital Advertising Alliance-Canada](#), [European Interactive Digital Advertising Alliance](#) or your device settings if you have the DAA or other mobile application.

**6. DATA SUBJECT RIGHTS.** If you are in the European Economic Area (EEA) you have the following rights:

- **Access.** Subject to certain exceptions, you have the right to request a copy of the Personal Data we are processing about you, which we will provide to you in electronic form. At our discretion we may require you to prove your identity before providing the requested information.

- **Rectification.** You have the right to require that any incomplete or inaccurate Personal Data that we process about you is amended.
- **Deletion.** You have the right to request that we delete Personal Data that we process about you, unless we are required to retain such data in order to comply with a legal obligation or to establish, exercise or defend legal claims.
- **Restriction.** You have the right to request that we restrict our processing of your Personal Data where:
  - you believe such data to be inaccurate;
  - our processing is unlawful; or
  - we no longer need to process such data for a particular purpose, but where we are not able to delete the data due to a legal or other obligation or because you do not want us to delete it.
- **Portability.** You have the right to request that we transmit the Personal Data we hold with respect to you to another data controller, where this is:
  - personal information which you have provided to us; and
  - we are processing that data on the basis of your consent or in order to perform our obligations under contract to you (such as to provide legal services).
- **Objection.** Where the legal justification for our processing of your Personal Data is our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless we have compelling legitimate grounds for the processing which override your interests and rights, or if we need to continue to process the data for the establishment, exercise or defence of a legal claim.
- **Withdrawing Consent.** If you have consented to our processing of your Personal Data, you have the right to withdraw your consent at any time, free of charge. This includes cases where you wish to opt out from marketing messages that you receive from us.

If you are in the EEA you also have the right to lodge a complaint with the local data protection authority if you believe that we have not complied with applicable data protection laws. [Access a list of local data protection authorities in EEA countries.](#)

**7. INFORMATION SECURITY.** We maintain reasonable technical and organizational measures to protect Personal Data from loss, misuse, alteration, or unintentional destruction. However, no security measure can guarantee against compromise. You also have an important role in protecting your Personal Data. You should not share your username and password with anyone, and you should not re-use passwords across more than one website. If you have any reason to believe that your username or password has been compromised, please contact us as detailed below.

**8. CROSS-BORDER TRANSFERS.** We transfer Personal Data to various jurisdictions as necessary for the purposes described above, including to jurisdictions that may not provide the same level of data protection as your home country. We provide appropriate protections for cross-border transfers as required by applicable law for international data transfers. With respect to transfers originating from the European Economic Area ("**EEA**"), we implement standard contractual clauses approved by the European Commission, and other appropriate solutions to address cross-border transfers as required by applicable law. Where required by such laws, you may request a copy of the suitable mechanisms we have in place by contacting us as detailed below.

## **9. OTHER ISSUES.**

*(i) What is the legal basis of processing?*

Some jurisdictions require an explanation of the legal basis for collecting and processing Personal Data. We have several different legal grounds on which we collect and process Personal Data, including: (i) as necessary to perform a transaction (such as when we respond to your requests); (ii) as necessary to comply with a legal obligation (such as when we use Personal Data for recordkeeping to substantiate tax liability); (iii) consent (where you have provided consent as appropriate under applicable law, such as for direct marketing or certain cookies); and (iv) necessary for legitimate interests (such as when we act to maintain our business generally). With respect to legitimate interests, given that we are a B2B company, we typically collect and process limited Personal Data about customer contacts and other individuals acting in their business capacities, as part of our overall effort to reduce the privacy impact on individuals.

*(ii) What are the consequences of not providing Personal Data?*

You are not required to provide all Personal Data identified in this Privacy Statement to use our website or to interact with us offline, but certain functionality will not be available if you do not provide certain Personal Data. If you do not provide certain Personal Data, we may not be able to respond to your requests, perform a transaction with you, or provide you with marketing that we believe you would find valuable.

*(iii) Do we engage in automated decision-making without human intervention?*

We do not use automated decision-making without human intervention, including profiling, in a way that produces legal effects concerning you or otherwise significantly affects you.

*(iv) Does the website honor do not track ("DNT") signals sent via browsers?*

Given the divergent practices of organizations that offer browsers and the lack of a standard in the marketplace, we do not respond to DNT signals at this time.

*(v) How long do we retain Personal Information?*

We typically retain Personal Data related to marketing activities for as long as you accept marketing communications from us and upon request, we will securely delete such data in accordance with applicable law. For Personal Data that we collect and process for other purposes, as described above, we typically retain such Personal Data for no longer than the period necessary to fulfill the purposes outlined in this Privacy Statement, and as otherwise needed to address tax, corporate, compliance, employment, litigation, and other legal rights and obligations.

*(vi) Are third party websites governed by this Privacy Statement?*

This website contains links and references to other websites (e.g., social media buttons) administered by unaffiliated third parties. This Privacy Statement does not apply to such third party websites. When you click a link to visit a third party website, you will be subject to that website's privacy practices. We encourage you to familiarize yourself with the privacy and security practices of any linked third party websites before providing any Personal Data on those websites.

*(vii) How does Esterline handle employee and contractor privacy issues?*

Personal Data about our employees and contractors are addressed through internal company policies and procedures, and are outside the scope of this Privacy Statement.

*(viii) How will we handle any changes to this Privacy Statement?*

We may update this Privacy Statement from time-to-time as our services and privacy practices change, or as required by law. The effective date of our Privacy Statement is posted below, and we encourage you to visit our website periodically to stay informed about our privacy practices. We will post the updated version of the Privacy Statement on our website, and ask for your consent to the changes if legally required.

**10. CONTACT US.** If you have questions or comments regarding this Privacy Statement or our privacy practices, please contact us at:

Esterline Corporation

Attn: Legal Department

500 108<sup>th</sup> Avenue NE

Bellevue, WA 98004

[DataPrivacy@Esterline.com](mailto:DataPrivacy@Esterline.com).

Effective Date: August 14, 2018