



Gates Canada Privacy Policy

POLICY STATEMENT

This Gates Canada Privacy Policy ("Policy") applies to the following Gates entities (collectively, "Gates", "we", "us" or "our"):

- (1) Gates Canada Inc., having its business addresses at 225 Henry Street, Building #8, Brantford, Ontario, Canada N35 7R4 and 3303 St. Etienne Blvd. Windsor, Ontario N8W 5B1.
- (2) Atlas Hydraulics Inc., having its business address at 369 Elgin Street, Brantford, Ontario, Canada N35 7P5.

Gates is committed to protecting and respecting any personal information you share with us. Gates will be acting as a "data controller" for the processing activities described in this Policy, which means that we control and are accountable for your personal information.

This Policy applies to our business activities in Canada and describes what types of information we collect from you, how it is used by us, how we share it with others, how you can manage the information we hold, and how you can contact us. If you are accessing our sites and services from outside of Canada, this Policy does not apply.

The contents of this Policy may change so please check this page from time to time. When required, we will also contact you directly to notify you of any substantial changes.

This version of our Policy is effective as of August 25, 2026.

WHAT INFORMATION DO WE COLLECT?

We collect information about you when you engage with our website, applications or authorised distribution network. We only collect information which is necessary, relevant and adequate for the purpose for which you are providing it to us.

We collect information about you when you use Gates websites, applications and customer service centres. Some of this information does not identify you personally but provides us with information about how you use our services and engage with us (we use this information to improve our services and make them more useful to you).

The information we collect includes some or all of the following:

1. Where you engage us in a business context, we may collect your job title, company contact details (including email addresses), and company details (some of which we may obtain from an online or public business directories);



2. The date and time you used our services;
3. The pages you visited on our website and how long you visited them;
4. Your IP address;
5. The internet browser and devices you are using;
6. Cookies, Pixels or Beacon information (for more information please see our Cookie Policy);
7. The website address from which you accessed our website;
8. Voice recordings of calls you make to our customer service centre; and
9. Any information within correspondence you send to us.

HOW DO WE USE THIS INFORMATION?

Gates will only process information that is necessary for the purpose for which it has been collected. You will always have the option to choose not to receive marketing communications from us (and you can withdraw any previous consent or object at any time).

There are various ways in which we may use or process your personal information. We list these below:

Contractual performance

We may use and process your personal information where this is necessary to perform a contract with you and to fulfil and complete your orders, purchases and other transactions entered into with us (or one of our authorised repairers or selected partners).

Marketing

We may use and process your information to:

1. Contact you from time to time about promotions, events, products, services or information which we think may be of interest to you (don't worry, we won't bombard you);
2. The placement of non-essential cookies when you visit our website (see Cookie Policy for more information).

You can withdraw your consent to receive marketing messages by using the unsubscribe option included in those messages, or by contacting us as described below.

Legitimate business purposes

We may use and process your personal information as set out below where it is necessary for us to carry out activities for which it is in our legitimate interests as a business to do so.



Processing necessary for us to support customers with sales and other enquiries:

1. To respond to correspondence you send to us and fulfill the requests you make to us (for example: service requests, brochure requests or information about specific products);
2. To analyse, evaluate and improve our products and services so that your visit and use of our website, applications, customer service centre and authorised distribution network are more useful and enjoyable (we will generally use data amalgamated from many people so that it doesn't identify you personally); and to provide service, maintenance and warranty information and reminders, unless you object;
3. To undertake market analyses and research (including contacting you with customer surveys) so that we can better understand you as a customer and provide tailored offers, products and services in which we think you will be interested; and
4. For product development purposes (for example, to improve product quality, performance and safety).

Processing necessary for us to promote our business, brands and products and measure the reach and effectiveness of our campaigns:

5. To contact our existing clients from time to time with marketing information (unless you object). In relation to any such information we send by email or SMS, we will include an option allowing you to object to receiving future messages by unsubscribing;
6. To identify and record when you have received, opened or engaged with our website or electronic communications (please see our Cookie Policy for more information);
7. To administer competitions and promotions that you enter with us from time to time and to distribute prizes;
8. To verify the accuracy of information that we hold about you and create a better understanding of you as a customer;
9. For network and information security purposes – i.e., in order for us to take steps to protect your information against loss, damage, theft or unauthorised access;
10. To comply with a request from you in connection with the exercise of your rights (for example, where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request); and



11. To inform you of updates to our terms and conditions and policies.

Legal obligation

We may process your personal information to comply with our legal requirements.

Vital interest

Sometimes we will need to process your personal information to contact you if there is an urgent safety or product recall notice and we need to tell you about it.

HOW DO WE SHARE THIS INFORMATION?

We do not sell your information to third parties, but we may share personal information with our authorised distribution network and with third party suppliers who fulfill business activities for us (e.g. marketing, events and market research, etc.).

We may share your personal information with other Gates entities who perform services on our behalf, or where necessary to provide a product, service or information that you request. We may also engage subcontractors ("processors"), who will only process your personal information as per our instructions for one or more of the purposes mentioned in this Policy. We, other Gates entities, and subcontractors may process your personal information outside of Canada. We will take steps to ensure that personal information processed outside of Canada receives a comparable level of data protection.

We may also disclose your personal information where we are permitted or required by law, for example, to comply with a subpoena or court order, or lawful request or demand for information. We may also share your personal information in connection with the sale, financing or other transaction involving all or part of our business or assets.

HOW LONG DO WE KEEP YOUR INFORMATION?

We will not hold your personal information in an identifiable format for any longer than is necessary. If you are a customer or otherwise have a relationship with us, we will hold personal information about you for a longer period than if we have obtained your details in connection with a prospective relationship.

Gates has published a data retention and data retention schedules policy. In case you have any further questions on the data retention periods relevant for your personal information, you can always contact us at: privacy@gates.com.



Gates has implemented reasonable physical, organizational and technological security measures to safeguard the personal information in our custody or control against loss or theft, and unauthorized access, use or disclosure. We limit access to personal information to authorized Gates personnel who require access for the purposes described in this Policy.

HOW CAN YOU MANAGE THE INFORMATION WE HOLD ABOUT YOU?

You have the right as an individual to access your personal information we hold about you and make corrections, if necessary. You also have the right to withdraw any consent you have previously given us and ask us to erase information we hold about you.

You have a number of rights in relation to your personal information under data protection law. In relation to most rights, we will ask you for information to confirm your identity and, where applicable, to help us search for your personal information. Except in rare cases, we will respond to you within 30 days after we have received any request (including any identification documents requested).

You have the right to:

1. Ask for access to the information that we hold about you, and ask for information about how we have processed it;
2. Correct and update your information;
3. Withdraw your consent;
4. Erase your information (or restrict the use of it), provided we do not have any continuing lawful reason to continue to use and process that information; and
5. Transfer personal information that you have provided to us to another person or to you, in a structured data file (in a commonly used and machine-readable format).

These rights are subject to contractual and legal restrictions.

You can exercise the above rights, manage your information, or make a complaint about our personal information handling practices, by contacting our Data Privacy Team via email at privacy@gates.com.