

## PRIVACY POLICY

This policy is issued by Woodward, Inc. (“Woodward”) on behalf of itself, its branches and its affiliates identified as controllers in the section “Controllers” below. Woodward is committed to protecting the personally identifiable information (“Personal Data”) of its members, individuals, customers, and suppliers. It is Woodward's intention to comply with the data privacy regulations of the countries in which it does business, including the EU General Data Protection Regulation (EU) 2016/679 and the Swiss Federal Act on Data Protection (“FADP”).

### Purpose

Woodward collects and processes personal data of its employees (“Members”), customers and supplier for the purpose of the performance of its contractual obligations, to further its legitimate interests, and to comply with all applicable laws to which Woodward and the affected Members, customers and suppliers in the EU, Switzerland and the U.S. are subject. Woodward uses personal data only for the purpose for which the data were originally collected.

### Processing of Member Personal Data

The Personal Data Woodward processes from its Members may include among other things, subject to statutory permission or consent as set out below: Member Number; Member Contact Information (name, phone#, email, and address); Current Position (job code); Title; Employment History (Woodward and previous employment); Education History, Department Number (past and present); Supervisor (past and present); Gender; Citizenship; Nationality; Pay Rate, Bonus Information; Date of Hire; Service Years; Date of Birth; Benefit Information; Performance Reviews; Emergency Contact Details; Photographs, Passports and Green Cards, Social Security Number, contact details of family members and dependents; Personal Bank Account Data, and Electronic Identifying Data such as activity logs, unique device identifiers, and geolocation data.

The data obtained from Members may be used if and as far as necessary for business purposes such as: Global Headcount Reporting; Staffing; Performance Management; Compensation Reviews; Payroll; Internal Audits; Internal Investigations; Trade and Regulatory Compliance; Ethics Investigations; Mergers, Acquisitions and Divestitures; Budgeting; Workforce Management; International Assignments; Reporting for Business/Management Review and Decision-Making; Environmental Health and Safety; Member Recognition; Disaster Recovery and Emergency Response Planning; Building Security; the Member Directory for internal company use; Succession Planning; Member Development; and Member Surveys.

### Special Categories of Personal Data

Except as required or permitted by law, Woodward does not process sensitive Personal Data about a Member's medical or health conditions; racial or ethnic origin; political opinions;

---

religious or philosophical beliefs; trade union membership; sexual orientation; or gender identity.

### **Legal Basis for Use of Member Privacy Data**

Personal Data of Members is processed if necessary to enable Woodward to initiate, to perform or to terminate employment contracts, compliance with legal and regulatory obligations, if and as far as applicable to further legitimate interests as a controller and or by a third party processor acting on behalf of Woodward (to the extent such legitimate interests are not overridden by our Members, customers or supplier's interests, fundamental rights or freedoms), and, or pursuant to prior consent in relation to Personal Data that is entirely voluntary and not necessary or required to be given under another legal basis. If Personal Data is processed on such consent, the Member has the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

### **Questions and Reports of Possible Policy Violations**

Concerns, complaints, or disputes regarding Personal Data protection of a Woodward Member should be directed to the Member's local Human Resources Department, or to the data protection officer, if applicable.

Concerns, complaints or disputes that cannot be resolved by contacting a local Woodward Human Resources Department, can be submitted to:

Woodward's Ethics Helpline:

<https://secure.ethicspoint.com/domain/media/en/gui/19830/index.html>  
+1-888-325-7915

For Non-U.S. locations please see:

<https://secure.ethicspoint.com/domain/media/en/gui/19830/phone.html>)

Woodward's Legal & Compliance Department:

Woodward GmbH, Handwerkstraße 29, 70565 Stuttgart, Germany, +49 (711)  
78954-0, or

Woodward, Inc., 1081 Woodward Way, Fort Collins, Colorado 80524, USA, +1 (970)  
482-5811;

or by e-mail to [Dataprotection@woodward.com](mailto:Dataprotection@woodward.com).

### **Processing of Customer, Supplier and Other Third-Party Privacy Data**

The Personal Data Woodward processes from its customers and suppliers may include among other things: Contact Information (name, titles, business address, business phone#, business fax# and business email); Customer/Supplier Status; Shipping Information; e-

---

Business; Web ID's and Web Preferences; Supplier Ownership Information; Supplier Accounts Payable Information; business Bank Account numbers; and Tax Information.

Personal Data obtained from customers and suppliers is used for purposes such as: Contacting Customers/Suppliers; Accounting/Accounts Receivable; Sales Agreements; Purchasing Agreements; Determining Applicable Discounts; Trade and Regulatory Compliance; Accessing e-Business Sites; Marketing; Addressing Quality Issues; Training, Operation of Physical Plants and Equipment, Facility Security, IT Operations and Security, Audit, Risk Management, Product Improvements, Exercising and Defending Legal Rights and Product Shipment.

### **Cookies and Third Party Tracking**

We may use cookies and clear GIFs on our website. "Cookies" are small pieces of information that a website sends to your device while you are viewing a website. We may use both session cookies (which expire after you close your browser) as well as persistent cookies (which will be saved on your device to provide us with data regarding your interests and to improve our marketing efforts. Such cookies also include cookies for behavior-based advertising. This means that a third party may use technology (e.g., a cookie) to collect information about your use of our website so that they can provide advertising about products and services tailored to your interests. Persistent cookies may be removed by following instructions provided by your browser.

Please find information on our use of Cookies and third party tracking in our [Cookie and Social Media Disclosure](#).

### **Legal basis for Use of Customer, Supplier and Other Third-Party Privacy Data**

Personal Data is processed to enable Woodward's performance of its business contracts, compliance with a legal and regulatory obligations, to further legitimate interests as a controller and or by a third party processor acting on behalf of Woodward (to the extent such legitimate interests are not overridden by our employees, customers or supplier's interests, fundamental rights or freedoms), and pursuant to consent in relation to Personal Data that is entirely voluntary and not necessary or required to be given under another legal basis.

Any concerns, complaints, or disputes regarding Personal Data for Woodward's customers or suppliers should be forwarded to Woodward's local Supplier/Customer contact or manager or to the data protection officer, if applicable.

Concerns, complaints or disputes that cannot be resolved by contacting a local Woodward Supplier/Customer contact or manager, can be submitted to:

Woodward's Ethics Helpline:

<https://secure.ethicspoint.com/domain/media/en/gui/19830/index.html>, +1-888-325-7915

For Non-U.S. locations please see:

<https://secure.ethicspoint.com/domain/media/en/gui/19830/phone.html>)

Woodward's Legal & Compliance Department:

Woodward GmbH, Handwerkstraße 29, 70565 Stuttgart, Germany, +49 (711) 78954-0, or

Woodward, Inc., 1081 Woodward Way, Fort Collins, Colorado 80524, USA, +1 (970) 482-5811;

or by e-mail: [Dataprotection@woodward.com](mailto:Dataprotection@woodward.com).

Woodward will cooperate with the EU Data Protection Authorities or Swiss Federal Data Protection and Information Commissioner, as applicable, in addressing disputes that cannot be resolved directly. Any data subject may have the right to file a complaint with any regulatory agency within their jurisdiction.

### **Data Quality, Proportionality, and Retention**

Woodward only processes Personal Data relevant for its proposed use. Reasonable measures are taken to ensure that the information is reliable for its intended use, accurate, complete and current. Woodward will adhere to this Principle of Data Quality and Proportionality for as long as the Personal Data is retained by Woodward.

All Personal Data will be retained by Woodward only as long as necessary to fulfill the purpose for which it was collected, and is subject to minimum retention schedules as may be mandated by law.

### **Disclosure of Personal Data**

Woodward may disclose Personal Data to the following third parties:

- you, and where appropriate, your family and agents,
- our agents and third party service providers,
- to government authorities in response to a lawful request, including to meet national security or law enforcement requirements, if required by law,
- service providers
- credit reference services
- corporate affiliates
- accountants, auditors, financial advisors, lawyers, accreditation bodies
- entities that acquire, or intend to acquire, Woodward or the assets of Woodward.

If Personal Data is being transferred to a third party for processing purposes on our behalf, such third parties will be subject to binding contractual obligations to only process the Personal Data in accordance with Woodward's prior instructions and use measures to protect the confidentiality and security of the Personal Data and in compliance with any additional requirements under applicable law.

---

## **International transfer of Personal Data**

Woodward conducts business on an international basis, and therefore may be required to transfer Personal Data between Woodward's international business operations, affiliated companies, customers, suppliers, to governments of other countries. Where we transfer Personal Data to other countries, Woodward will do so on the basis of adequacy decisions, Standard Clauses approved by EU Data Protection Agencies, or other valid transfer mechanism.

## **Data Security**

Woodward takes reasonable and appropriate security measures to safeguard the Personal Data of Members, suppliers and customers. Woodward has initiated processes and procedures designed to help protect the confidentiality, integrity and recoverability of Personal Data from loss, misuse, unauthorized access, disclosure, alteration and destruction. Woodward takes reasonable measures to prevent data corruption and unauthorized access to information maintained in its database. Persons who have access to Human Resource Information System ("HRIS") and customer/supplier databases containing Personal Data only have permissions to view the information they need to do their jobs. The system administrator and Human Resources control access to personal electronic information via user permissions.

## **Access to Your Personal Data**

You may have the right to request access to your personal information and information regarding the nature, processing and disclosure of such personal information. If required by law, upon request we will grant reasonable access to the personal information that we hold about a Member, customer, or supplier, as set out in Art.15 GDPR.

## **Deletion of Your Personal Data**

You may have the right to request that we delete your personal information, on legitimate grounds, as set out in Art. 17 GDPR. We may also decide to delete your data if we believe that the data is incomplete, inaccurate, or that our continued use and storage are contrary to our obligations to other individuals or third parties. When we delete personal information it will be removed from our active database, but it may remain in archives where it is not practical or possible to delete it. In addition, we may keep your personal information as needed to comply with our legal obligations, resolve disputes, and/or enforce any of our agreements.

## **Changes to Your Personal Information**

You may have the right to request a correction of your Personal Data, as set out in Art. 16 GDPR.

---

## **Restriction of Processing**

You may have the right to request restriction of the data processing, where one of the grounds set out in Art. 18 GDPR applies.

## **Right to Object**

You may have the right to object as set out in Art. 21 GDPR, on grounds relating to your particular situation, to the processing of your Personal Data at any time, if we process your personal data on the legal base of legitimate interest. Woodward will not process your Personal Data, unless Woodward can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedom or the processing is required for the establishment, exercise or defense of legal claims.

## **Data Transferability**

You may have the right to have your Personal Data that Woodward processes or controls transferred to yourself or another controller, as set out in Art. 20 GDPR, to the extent applicable.

## **Exercising your rights**

Members can exercise their rights through their local HR Department; customers and suppliers can exercise their rights through their local Woodward contact. If applicable, rights can be exercised through Woodward's data protection officer.

## **Lodging Complaints with Data Protection Authorities**

You may have the right to raise complaints with Data Protection Authorities regarding the processing of your Personal Data by Woodward or on Woodward's behalf (Art. 77 GDPR). You may execute this right at a Data Protection Authority in the member state of your place of residence, your job or the place of the presumed offence.

## **Direct Marketing**

All potential and existing customers will only receive product marketing via e-mail communications if we obtained their prior consent. If you are an existing customer we may send you product marketing e-mails if we obtained your electronic contact details, in the context of the sale of a product or a service for similar products or services provided that you clearly and distinctly were given the opportunity to object to such direct marketing when your contact details were collected and on the occasion of each message in case you have not initially refused such use. Therefore all potential and existing customers have the option to opt-out of product marketing telephone and e-mail communications and call lists at any time and any contact occasion.

If local laws require an opt-in for marketing communications, Woodward is committed to respecting the customer's preferences, as set out in the customers consent declaration.

---

## Enforcement

Woodward conducts internal compliance reviews as part of an internal self-audit process and provides appropriate training to Members that have access to the Personal Data of Members, customers, or suppliers.

Any Member who violates Woodward's privacy or security policies is subject to disciplinary action, up to and including termination where permitted by applicable law. If a Member, customer, or supplier believes Woodward or a Woodward representative is not observing the principles stated within this policy, they should contact Woodward directly.

Concerns, complaints or disputes that cannot be resolved by contacting a local Woodward Human Resources Department, can be submitted to:

Woodward's Ethics Helpline:

<https://secure.ethicspoint.com/domain/media/en/gui/19830/index.html>, +1-888-325-7915

For Non-U.S. locations please see:

<https://secure.ethicspoint.com/domain/media/en/gui/19830/phone.html>)

Woodward's Legal & Compliance Department:

Woodward GmbH, Handwerkstraße 29, 70565 Stuttgart, Germany, +49 (711) 78954-0, or

Woodward, Inc., 1081 Woodward Way, Fort Collins, Colorado 80524, USA, +1 (970) 482-5811;

or by e-mail to: [Dataprotection@woodward.com](mailto:Dataprotection@woodward.com).

## Notification of Change

Woodward reserves the right to amend this policy at any time. Any changes made to this privacy policy will be posted to the internet, intranet, and other places Woodward deems appropriate.

## Controllers

For the purposes of this policy the relevant controllers are:

Woodward, Inc., 1081 Woodward Way, Fort Collins, Colorado 80524, USA,

Woodward HRT, Inc., 25200 West Rye Canyon Road, Santa Clarita, California 91355 USA

Woodward MPC, Inc., 6300 West Howard Street, Niles, Illinois 60714, USA

Woodward FST, Inc., 700 North Centennial Street, Zeeland, Michigan 49464, US

Woodward GmbH, Handwerkstraße 29, D-70565 Stuttgart, Germany  
Data Protection Officer: Von Zur Mühlen'sche GmbH, BdSI, Alte Heerstraße 1, 53121  
Bonn, Germany, e-mail: [extdsb@vzm.de](mailto:extdsb@vzm.de), +49 228 96293-0

Woodward Kempen GmbH, Krefelder Weg 47, D-47906 Kempen, Germany  
Data Protection Officer: Von Zur Mühlen'sche GmbH, BdSI, Alte Heerstraße 1, 53121  
Bonn, Germany, e-mail: [extdsb@vzm.de](mailto:extdsb@vzm.de), +49 228 96293-0

Woodward Power Solutions GmbH, Krefelder Weg 47, D-47906 Kempen, Germany  
Data Protection Officer: Von Zur Mühlen'sche GmbH, BdSI, Alte Heerstraße 1, 53121  
Bonn, Germany, e-mail: [extdsb@vzm.de](mailto:extdsb@vzm.de), +49 228 96293-0

Woodward Aken GmbH, Köthener Chaussee 46, D-06385 Aken (Elbe), Germany  
Data Protection Officer: Von Zur Mühlen'sche GmbH, BdSI, Alte Heerstraße 1, 53121  
Bonn, Germany, e-mail: [extdsb@vzm.de](mailto:extdsb@vzm.de), +49 228 96293-0

L'Orange GmbH, Porsche Straße 8, 70435 Stuttgart, Germany  
Data Protection Officer: Alexander Lewandowski, e-mail:  
[alexander.lewandowski@lorange.com](mailto:alexander.lewandowski@lorange.com), +49 (0) 711 82609 4110

Woodward Nederland B. V., South Point Building B, Scorpius 120-122, 2132 LR Hoofddorp

Woodward Poland Sp. z o. o., Ul. Skarbowa 32, 32-005 Niepolomice, Poland

Woodward Bulgaria EOOD, 64 Hristofor Kolumb Blvd., Sofia Airport Center, Logistics  
Building B03, 1592 Sofia, Bulgaria

Woodward International, Inc., 5 Shawfarm Road, Prestwick, KA 9 2TR, United Kingdom

Woodward International, Inc., Lancaster Centre, Meteor Business Park, Cheltenham Road  
East, Gloucester, GL 2 9QL, United Kingdom

Woodward's Corporate Vice President, General Counsel & Chief Compliance Officer must  
approve all changes to this policy and/or privacy practices. Any changes made to our  
privacy practices will be prominently posted on our Web Site.



Thomas A. Gendron  
Chairman of the Board,  
Chief Executive Officer  
and President