

Effective date of this Privacy Statement March 28, 2025

PRIVACY STATEMENT

CP Witter Ltd, located at C/O Dyke Yaxley Limited, 1 Brassey Road, Old Potts Way Shrewsbury, SY3 7FY, UK, and its affiliates ("**Witter Towbars**" or "**We**" or the "**Company**") values the protection of your privacy and the security of personal data. This Privacy Statement ("**Statement**") provides information on the processing of personal data by CP Witter Ltd.

This notice addresses, in the order below, the following issues:

- (a) how we collect your personal data;
- (b) to who this Statement applies;
- (c) the categories of data we process, the purposes for which we process that data and lawful basis;
- (d) to whom we disclose data;
- (e) retention period;
- (f) your rights and information on how to exercise them;
- (g) amendments to this Statement; and
- (h) how to contact us.

HOW WE COLLECT PERSONAL DATA

Information included in this Statement applies to all processing of personal data carried out by CP Witter Ltd unless expressly provided otherwise (e.g. in the case of campaign or promotional regulations, websites dedicated to product launches, etc.). We may collect personal data in variety of ways, including:

- [Witter-towbars.co.uk](https://www.witter-towbars.co.uk) and any other website operated by us from which you are accessing this Statement ("**Websites**"), e.g. the processing of personal data via a contact form or to register for a newsletter;
- The software applications made available by us for use on or through computers and mobile devices ("**Apps**");
- Our social media pages that we control ("**Social Media Sites**"); Websites, Apps and Social Media Sites are hereafter collectively referred to as the "**Services**".
- Cookies and other tracking tools that allow us to analyse the use of our website, to improve it, or to improve your experience interacting with our website (for more information, please see the Cookie Policy)
- Offline: We may collect personal data from you offline, such as when you visit stores to purchase our products, attend one of our trade shows, place an order over the phone or contact customer service;

WHEN THIS STATEMENT APPLIES

This Statement applies to the processing of personal data related to you by the Company.

This Statement does not apply in relation to services or products offered by other companies or

individuals, including those posted on our websites or about which we otherwise inform. This Statement does not cover the activity of other companies or individuals who advertise our services or products.

PURPOSE OF PROCESSING. TYPES OF PERSONAL DATA. LAWFUL BASIS.

Purpose of processing	Types of personal	Lawful basis
Customer support services – answering questions and resolving issues or complaints regarding the execution of agreements and providing the Services.	Email address, name, company name, telephone, address, city, country	The lawful basis we rely on to process your personal data for the purpose is performance of a contract and our legitimate interest to conduct business in responsible manner. If you do not provide the information that we request, we may not be able to provide you with the requested services.
Sending administrative information – e.g. information regarding the Services, product tests, surveys and changes to our terms, conditions and policies.		The lawful basis we rely on to process your personal data for the purpose is performance of a contract.
E-marketing purposes – sending you promotional emails and newsletters		The lawful basis we rely on to process your personal data for the purpose is consent.
Offline marketing purposes – participating in instore promotions and loyalty programmes, collecting data through registration at events and trade shows		We process your data for this processing activity upon your consent.
Participating in contests and campaigns – sending you additional information about the contest or a prize if you are the winner of the contest. Unless we mention otherwise when collecting your information, we will use this data solely for the purpose of managing and administering competitions or promotions	The data collected through a contest may include, for example, your name, e-mail address, and/or phone number. If you are the winner of a prize, we	Your consent for participation in the campaign. Performance of the contract between you and us regarding the delivery of the prize to the winner Fulfilment of a legal obligation (tax legislation)

	may also request your full address in order to send you the prize where a physical prize is provided. Country of residence can be collected due to contest's geolocation limitation.	(concerning the winner's data). Legitimate interest of the Controller to defend its rights concerning any complaint or claim (data related to participants).
Data analysis and targeted advertisement - enhancing, improving or modifying our Services and providing personalised product recommendations by using AI-driven or manually curated suggestions.		The lawful basis we rely on to process your personal data for the purpose is consent.

SHARING YOUR PERSONAL DATA WITH OTHERS

The following third parties have access to your personal data where relevant (and only to the extent strictly necessary):

- CP Witter Ltd affiliates for the purposes described in this Statement;
- To our third-party service providers who provide services, including website hosting, data analysis, information technology and related infrastructure provision, customer service, email delivery, auditing and other services;
- To third parties, to permit them to send you marketing communications, consistent with your choices;
- To third-party sponsors of sweepstakes, contests and similar promotions;
- To public authorities based on our legal obligation and in accordance with applicable laws.

UNDER WHAT CONDITIONS WE MAY TRANSFER DATA YOUR TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS

CP Witter Ltd is a global company and your personal data may be transferred to CP Witter Ltd's affiliates or third parties. When we transfer personal data from the European Economic Area to the third parties in countries not recognized by the European Commission as providing an adequate level of data protection, such transfers are governed by the Standard Contractual Clauses or the appropriate transfer mechanism as provided by Chapter V GDPR.

RETENTION PERIOD

We will retain your personal data for as long as required or permitted for the purposes for which it was obtained or used. The criteria used to determine our retention periods include: (i) the length of

time for which we have an ongoing business relationship with you; (ii) whether there is a legal obligation we are subject to; or (iii) whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

YOUR RIGHTS

You have a number of rights under applicable data protection law in respect of our processing of your personal data. These include:

- The right to request access to your personal data;
- The right to request rectification of any personal data that we hold;
- Subject to certain conditions:
 - o The right to request erasure of your personal data;
 - o The right to request restriction of processing of your personal data;
 - o The right to have your personal data transferred to another controller.
- Where we rely on your consent for processing, the right to withdraw such consent;
- Where we rely on legitimate interest for processing, the right to object to such processing.

Should you wish to exercise any of these rights and/or if you have any questions about the way in which we process your personal data, you can let us know via ea-ger-info@horizonglobal.com. We are happy to help you.

You have the right to submit a complaint make a complaint to the Information Commissioner's Office (ICO) or get advice from the ICO.

Telephone: 0303 123 1113

Textphone: 18001 0303 123 1113

Information Commissioner's Office

Wycliffe House Water Lane, Wilmslow, Cheshire ,SK9 5AF

ABOUT THIRD-PARTY DATA

If you provide us with personal data concerning other persons (e.g. your family members, dependants, etc.), you must ensure that you have informed them about this and have directed to this them information about how the Controller processes personal data.

We will inform those individuals in an appropriate manner about how we process their data, where appropriate.

ABOUT MINOR'S DATA

This website as well as all products and services available on it are intended exclusively for persons of legal age. From the platform's perspective, minors will be considered to be persons under the age of 18 (regardless of whether that person is over the age of 16 and is able, under the GDPR, to independently consent to the processing of personal data). We reserve the right to delete any account and to remove or delete any personal data that we believe or suspect may be personal data

of minors. We reserve the right to hold liable any person who provides personal data or attempts to use the platform other than in accordance with the terms and conditions of use and this policy.

OTHER POLICIES WE SUGGEST YOU READ

While this Statement contains the information you need about how we collect and use your personal data, there is information that we encourage you to read that can be found elsewhere.

COOKIE POLICY

When you use our website, information may be collected through cookies to distinguish from other website users and other products and services. We have a separate cookie which policy explains our use of cookies and the purposes for which we use them.

TERMS AND CONDITIONS

Our terms and conditions indicate the terms under which you may use our website and should be read together with this privacy notice.

CONNECTED PLATFORMS

Our platform may, from time to time, contain links to the digital platforms of our partner networks, third party service providers integrated into the platform (e.g. WhatsApp link to contact instructors). If you follow a link to any of these websites, please note that these websites have their own personal data processing policies as well as different terms and conditions of use and that we accept no responsibility or liability for these policies or for the manner in which any independent third party carries out the processing of your personal data or for the purposes and ways in which they use or make available those websites or platforms. Please check these policies before submitting any personal data to or engaging in any interaction with these websites or platforms

NO AUTOMATED DECISION-MAKING PROCESS

We do not make decisions based solely on the automated processing of data your (including profiling) that produce legal effects in relation to you or you similarly affect to a significant extent.

CHANGES TO THIS STATEMENT

The services that CP Witter Ltd provides are always evolving and may change from time to time without prior notice to you. For this reason, we reserve the right to change or add to this Statement accordingly.

We will post a prominent notice on our Websites to notify you of any significant changes to this Statement, and will indicate at the top of the notice when it was most recently updated. We encourage you to check back often to review the latest version.

HOW TO CONTACT US

If you have any questions about this Statement, please contact us at Alyona.bayardo@lumileds.com.