



VIRGINIA - GEORGIA TRANSFORMER
ONE SOURCE—ONE COMMITMENT

Virginia Transformer Corporation
220 Glade View Drive Roanoke, VA 24012

Privacy and Cookie Notice

1. Introduction

This Privacy and Cookie Notice ("Notice") applies to the Virginia Transformer Corporation (VTC) of companies, which means each entity in which VTC, directly or indirectly, has a majority holding or owns or controls the majority of voting rights. VTC is responsible for the processing of your personal data and other information related to you (such as cookies) and controls how it is used, in accordance with this Notice.

At VTC, respecting your data protection rights is a top priority. This Notice explains how we use personal data and other information about you, how we process such data, and what rights you have regarding your personal data.

2. Who is responsible for the processing of your personal data?

Virginia Transformer Corp. and its subsidiary companies are responsible for your personal data. For applicable privacy and data protection laws, the primary controller of your data is VTC which is communicating with you. Other subsidiary companies of VTC may also receive and process your personal data, either in the capacity of controller or processor and this Notice applies equally to them.

3. The types of information we collect and use

VTC collects and uses personal data that concerns you in connection with the use of our products. VTC may collect the following categories of personal data and other information related to you (such as cookies):

- Identification data and business contact information you share with us such as first name, last name, job/position/title, business email address, business address, telephone number, mobile telephone number, telefax number, private telephone number, gender, date of birth, login credentials.
- Additional information you provide to us in the course of your use of the platform, register for an account and providing the service requested such as interests in our products, subscription preferences, personal preferences, profile information (cv), posts on digital channels, comments, opinions, images and videos, credit card and other payment information.

- Electronic Identification data and information collected by the communications systems, IT applications and website browser such as information technology usage (system access, IT and internet usage), device identifier (mobile device ID, IP address, browser type, browser settings, time and URL accessed, cookies), registration and login credentials, login data and log files, analytics ID, searches, website registration and sound recordings (e.g. voice mail/phone recordings, Skype/Zoom/Teams recordings).

In case you would like to be provided with information about a specific personal data processing activity, you can request that by submitting a request at support@vatransformer.com.

4. Why we use your personal data

We may use your personal data and other information as described above for the following purposes:

- to understand your interests and preferences in relation to our products;
- to register an account, grant you access to and authenticate you;
- to subscribe and in the course of the subscription to follow comments, posts, articles, authors, news and updates about our products and services;
- in the course of creation of and publishing media and press releases, to create brochures, news, media assets (such as images, videos), newsletters etc.
- in order to create articles that will be published on our internal and external sites;
- to provide you the possibility to create your profile on our digital channels for example to create posts, make comments, follow posts and discussions and sign-up for newsletters etc.;
- to allow you making posts, comments, upload content, participate quizzes and publishing opinions on our digital channels;
- in the course of sharing job ads on our digital channels;
- to provide customer support and process, evaluate and respond to requests and inquiries;
- to collect your image and your personal data in the course of an event to show impressions of an event; and
- to create lists of contact persons for specific topics.

VTC only collects the personal data from you that we need for the above purposes. For statistical purposes, improvement of our services and testing of our IT systems we use as much as reasonably possible anonymized data. This means that these data can no longer (in)directly identify you or single you out as an individual.

VTC may offer certain digital channels where you can post information on the site which will then be available to other visitors of the site. Examples are discussion forums and comments on blogs. When you post, basic information identifying you as the poster will be made available to other visitors together with your posted information. This information includes your name or alias, and where relevant, may include other information such as your country or the name of the company or

organization you work for. You have control over this data in your user profile and can control what will be shown in your posts.

We may also display statistical, reputational, and other similar information related to your user account. Examples are the number of forum posts you have posted or a rating showing how useful other visitors have rated your posts.

5. What happens if you do not provide us with the information we had asked you for or if you ask us to stop processing your information?

Where it concerns processing, and operations related to our digital channels (as described above), VTC will not be able to adequately establish, conduct or terminate a business relationship with you or your company and generally perform the purposes described above without certain personal data. Although we cannot obligate you to share your personal data with us, please note that this then may have consequences which could affect the use of the platform in a negative manner, such as not being able to provide the requested service, take requested pre-contractual measures to enter into a contract with you, or to establish and continue the business.

6. The legal basis we rely on

We use your personal data and other information related to you for the purposes described in this notice based on one of the following legal bases, as applicable:

- We may process your personal data for the fulfilment of contractual obligations resulting from contracts with you or your company, or as part of pre-contractual measures we take;
- We will ask your consent for the activities described in this privacy notice when required by applicable law, for example when we process your data for carrying out analytics by the use of first- and third-party cookies; or
- In some cases, we rely on our legitimate interests to process your personal data insofar as this is not overridden by your own privacy interests. Such interests may include:
 - Better understand users' behavior to further improve our offerings
 - Purposes of ensuring network and information security (for example to prevent malicious use such as hacking and denial of service attacks)
 - Offering a personalized service and communications
 - Analytics and profiling for business intelligence
 - Allowing interaction on products and services offered by us

7. Parties we share your personal data with (in and outside the country where our company that controls your data is located)

We only share your personal data with other Virginia Transformer Corp affiliates or third parties as necessary for the purposes described in the table below. In certain services we offer, your group membership and user profile may be visible to other users in the same group and such user data is also visible to you. Where we share your personal data with an affiliate or third party so that it is transferred to

or becomes accessible from outside the country where the VTC company that controls your data is located, we always put adequate safeguards in place to protect your personal data.

8. How long we keep your personal data

Based on mandatory legislation, VTC must keep certain personal data for a minimum period of time. We only keep your personal data for as long as necessary for the purposes described in this privacy notice. After this time, we will securely delete your personal data, unless we are required to keep it in order to meet legal or regulatory obligations, or to resolve potential disputes. Note, VTC will to the extent necessary delete posts, articles, press releases or destroy brochures, where your image was used; and will remove it from all databases to avoid further usage.

At the same time, applicable data protection laws require that we do not keep personal data in an identifiable form for any longer than is necessary for the purpose for which the personal data is being processed. Through the setting of IT applications and policies we ensure that our keeping of your personal data is deleted when we no longer need it.

9. Your data privacy rights

Depending on the jurisdiction in which you are located and in which your personal data is processed, you may have the following rights:

Data Privacy Rights	What it means
The right to access your data	You are entitled to ask VTC for an overview of or to obtain a copy of the personal data we hold about you.
The right to have your data corrected	You may request immediate correction of inaccurate or incomplete personal data we hold about you.
The right to have your data erased	You may request personal data to be erased when it is no longer needed, where applicable law obliges us to delete the data or the processing of it is unlawful.
The right to restrict data processing	You have the right to restrict the processing of your personal data in specific circumstances.
The right to data portability	You have the right to receive your personal data in a structured, machine-readable format for your own purposes, or to request us to transfer it to a third party.
The right to object to data processing	You have the right to object to our processing of your personal data where we rely on our legitimate interests as the basis for our processing, where your data protection rights outweigh our reasoning for legitimate interests.
The right to withdraw consent	Where VTC has asked for your consent to process personal data, you may withdraw consent at any time. The withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.

Please note that the rights described above are not absolute, and that your request cannot always be met entirely. For example, sometimes we cannot delete or restrict the processing of your personal data as we may have legal obligations or contractual obligations to keep certain such personal data.

10. Contact and further information

If you want to access your personal data, make use of any of your other rights mentioned above or if you have any questions or concerns about how VTC processes your personal data, please contact us at 540-345-9892 or support@vatransformer.com.

Should you not be satisfied with our response or believe we are processing your personal data against the law, you may also have the right to file a complaint with the Data Privacy Authority in your country of residence or work or seek a remedy through the courts where you believe an infringement of data privacy laws may have taken place.

11. Links

The external sites linked to from the VTC web sites are developed by people over whom VTC exercises no control. These other sites may place their own cookies on your computer, collect data or solicit personal information. Please refer to the privacy notice on each site for more information.

12. Cookie Policy

A cookie is a small text file that a website stores on your computer or mobile device when you visit the site. We use cookies to improve the quality of our service and to better understand how people use our websites. We do this by storing user preferences in cookies and by tracking user trends and patterns of how people navigate our sites. We use cookies to distinguish visitors from each other by assigning a random anonymous identifier to each visitor. We may collect information about your browsing habits on our website (such as pages visited, links clicked on, length of time spent on certain pages etc.).

Cookies specific to the VTC website

VTC's website uses both "First party" cookies (cookies set by the VTC website) and "third party" cookies (cookies set by a third-party website that is providing a service for the VTC website). We use first party cookies for keeping the website running, improving user experience, creating a profile of your interest to provide you tailored information according to your expressed interests storing preferences, tracking user trends and patterns with the help of web statistics providers and for storing data needed throughout your visit on the site (for example, contents of your shopping cart). We use third party cookies for analytics purposes.

Our website may use cookies of the following kinds:

- **Strictly necessary cookies:** Used for purposes such as to route the information over the network and detect transmission errors, control of electronic communication channels and traffic load, etc. These cookies are necessary for the website to function and cannot be switched off in our systems.

- **Functional cookies:** Used for purposes such as to remember your settings and preferences, history of your visit on the site, user authentication (logging in), increase the security, allow social networks users to share contents and when needed to play back video or audio content. These cookies are necessary to provide specific functionalities to you as a part of the services you have requested on the VTC digital channels.
- **Social plug-in tracking cookies:** Used by third party social network sites for purposes such as analytics when we embed content from their website on ours.
- **First and third-party analytics cookies:** Used for VTC's purposes such as to measure the traffic, performance and usage patterns of our website, test improvements of the website, detect search engine keywords that lead to a webpage or to track down website navigation issues. In the case of third-party analytics cookies, the data is anonymized.

In general, cookie data are stored for the duration of up to 24 months.

We may provide links to third party integrations. Third party integrations are websites or platforms that synchronize with our Site to provide you with additional functionality, tools, or services such as a direction, collecting resumes, sharing documents or videos, or sending announcements. You acknowledge and agree we are not responsible for the availability of such sites or resources and do not endorse and are not responsible or liable for any content, advertising, goods, services or other materials on, available through, or provided by such sites or resources. We are not responsible for the privacy or other practices of such sites and cannot guarantee the security of any of your personal information that you provide or is collected by such sites. We encourage you to review the privacy policies and terms and conditions on those linked sites.

How to manage cookies

You can set your browser to refuse all cookies or to indicate when a cookie is being sent. However, some features or services on our sites may not function properly without cookies.

13. California

Effective January 1, 2023

This notice to California residents is provided under California law. It explains your privacy rights, provides our "notice at collection," and provides certain mandated disclosures about our treatment of California residents' information, both online and offline.

Notice of Collection of Personal Information

We may collect the following categories of personal information about our guests and users of our digital properties: identifiers/contact information, demographic information (such as gender and age), payment card information associated with you, commercial information, Internet or other electronic network activity

information, geolocation data, audio, electronic, visual or similar information, and inferences drawn from the above.

We collect this information so that we can best serve you, including to fulfill your requests and to share offers that we think you may be interested in.

Disclosures/Sharing/Selling

California residents also have the right to “opt out” of the “sale” or “sharing” of their “personal information” to or with “third parties” (as those terms are defined under law).

“Do Not Share or Sell My Personal Information” Rights

You or your authorized agent can opt out of the “sale” or “sharing” of your personal information to third parties.

Certain data collection on our sites and applications for purposes of interest-based advertising and social media tools may be a “sale” or “sharing” under California privacy law. Instructions for how you can exercise these rights are set forth below in the “California Residents’ Rights” section.

California Residents’ Rights

Right to Access

You have the right to request, up to two times each year, access to categories and specific pieces of personal information about you that we collect, use, disclose, sell, and share.

Right to Delete

You have the right to request that we delete personal information that we collect from you, subject to applicable legal exceptions.

Right to Correct

You have the right to request that we correct inaccurate personal information that we maintain about you, subject to applicable legal exceptions.

Right to Opt Out of Sale or Sharing of Personal Information

You have the right to “opt out” of the “sale” or “sharing” of your “personal information” to or with “third parties” (as those terms are defined by applicable law).

Exercising Your California Privacy Rights

Making Access, Deletion, and Correction Requests

To make an access, deletion, or correction request, please visit vatransformer.com. Before completing your request, we may need to verify your identity. We may request additional documentation or information solely for the purpose of verifying your identity.

Instructions for Authorized Agents Making Requests

You may also use an authorized agent to submit an access, deletion, or correction request on your behalf. Authorized agents may submit such requests at vatransformer.com. An authorized agent must have your signed permission to submit a request on your behalf or provide proof that they have power of attorney in accordance with California probate law. Before completing requests from authorized agents, we may contact you directly to confirm you've given your permission and/or to verify your identity.

Making Requests to "Opt Out" of the "Sale" or "Sharing" of "Personal Information"

To submit a request to opt out of the sale or sharing of your personal information, you may click on the link "Do Not Sell or Share My Personal Information" on the footer of our websites or you may choose to enable online, where available, a universal tool that automatically communicates your opt-out preferences, such as the Global Privacy Control ("GPC"). We will process the GPC signal as a request to opt out. You may also use an authorized agent to submit a request to opt out on your behalf if you provide the authorized agent signed written permission to do so. Authorized agents may submit requests to opt out by visiting vatransformer.com. You have the right not to receive discriminatory treatment for the exercise of your privacy rights.

California Mandatory Disclosures

We also make the following disclosures for purposes of compliance with California privacy law:

- We collected the following categories of personal information in the last 12 months: identifiers/contact information, demographic information (such as gender and age), payment card information associated with you, commercial information, Internet or other electronic network activity information, geolocation data, audio, electronic, visual or similar information, and inferences drawn from the above.
- The sources of personal information from whom we collected are: directly from our guests, third-party sites or platforms that you link with your registration account, analytics tools, social networks, advertising networks, and third-party services that update or supplement information we hold about you.
- The business or commercial purposes of collecting personal information are as summarized above and in our Privacy Policy.
- We disclosed the following categories of personal information for a business purpose in the last 12 months: identifiers/contact information, demographic information (such as gender and age), payment card information associated with you, commercial information, Internet or other electronic network activity information, geolocation data, audio, electronic, visual or similar information, and inferences drawn from the above. We disclosed each category to third-party business partners and service providers, third-party sites or platforms such as social networking sites, and other third parties as described in our Privacy Policy.
- As defined by applicable law, we "sold" or "shared" the following categories of personal information in the last 12 months: identifiers/contact information, Internet or other electronic network activity

information, and inferences drawn from the above. We “sold” or “shared” each category to or with advertising networks, data analytics providers, and social networks.

- The business or commercial purpose of “selling” or “sharing” personal information is to assist us with marketing, advertising, and audience measurement.
- We do not “sell” or “share” the personal information of known minors under 16 years of age.

Shine the Light Act

If you are a California resident, California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your personal information by certain members of Virginia Transformer Corporation to third parties for the third parties’ direct marketing purposes. We take great pride in the relationship of trust we have built with our guests over many years and we are dedicated to treating your personal information with care and respect. Pursuant to California Civil Code Section 1798.83(c)(2), members of Virginia Transformer Corporation do not share guests’ personal information with other member companies or others outside Virginia Transformer Corporation for those parties’ direct marketing use unless a guest elects that we do so.

Removal of Content

If you are a California resident under the age of 18, and a registered user of any site where this policy is posted, California Business and Professions Code Section 22581 permits you to request and obtain removal of content or information you have publicly posted.

To make such a request, please send an email with a detailed description of the specific content or information to support@vatransformer.com. Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.

14. Additional Information for EEA Users

Users in the European Economic Area have the right to request access to, rectification of, or erasure of their personal data; to data portability in certain circumstances; to request restriction of processing; to object to processing; and to withdraw consent for processing where they have previously provided consent. These rights can be exercised as described in the Privacy Policy sections above. EEA users also have the right to lodge a complaint with their local supervisory authority.

As required by applicable law, we collect and process information about individuals in the EEA only where we have a legal basis for doing so. Our legal bases depend on the Services you use and how you use them. We process your information on the following legal bases:

- You have consented for us to do so for a specific purpose;

- We need to process the information to provide you the Services, including to operate the Services, provide customer support and personalized features and to protect the safety and security of the Services;
- It satisfies a legitimate interest (which is not overridden by your data protection interests), such as preventing fraud, ensuring network and information security, enforcing our rules and policies, protecting our legal rights and interests, research and development, personalizing the Services, and marketing and promoting the Services; or
- We need to process your information to comply with our legal obligations.