

## WEBSITE PRIVACY POLICY

This Privacy Policy was last updated in September 2017.

The privacy of your personal information is of the utmost importance to Pirelli Tire LLC (hereinafter "Pirelli", "we", "us" or "our", as appropriate). This Privacy Policy covers the information that we collect about you, that you provide to us online or that we collect when you interact with us through our website located at <http://www.pirelli.us> ("Website") or through any other Pirelli website, mobile app or online service that links to this policy. It also explains how we use cookies and similar technologies. By providing us with your personal information or by visiting our Website, you agree to be bound by the terms and conditions of this Privacy Policy.

**If you do not understand any aspects of our Privacy Policy, please feel free to contact us at [privacy.nafta@pirelli.com](mailto:privacy.nafta@pirelli.com). If you do not agree with the terms and conditions of this Privacy Policy, you must immediately cease using and accessing this Website and any content, services, or products contained in, or available from, this Website.**

### **Collection and Use of Personal Information**

**Information you provide.** We may collect your name, contact information, e-mail address, home address, and any other information when interact with us, make an inquiry through our Website, submit a tire registration form, or when you contact us. We will use this information to contact you in order to answer your questions and requests, to provide you with the information, the product and/or service which you have requested, to market our or other services to you, or to manage our everyday business needs. If you have applied for employment with Pirelli, the personal information submitted with your job application will be used for recruitment and other customary human resources purposes. For example, we may send you information about new job opportunities within Pirelli as well as other career development resources.

***Notwithstanding the foregoing, for tire registration made through our Website, Federal law prohibits us from reselling tire registration information or using it for marketing purposes. We will only contact you in the event of a recall or replacement.***

**Registration and Ordering.** Before ordering products on our Website, you typically must complete an online registration form. During registration, you will be prompted to provide certain personal information, including but not limited to your name, shipping and billing address(es), phone number, email address, and credit card number. This information may be accessed and/or shared by us as well as our third party vendors and suppliers for billing purposes, to process your transactions, to create and share reports about the transactions, to communicate with you about your order and the Website, to market to you, or to provide related customer service.

**Technical information.** When you browse our Website, we or third parties such as online ad networks and those engaged in analytics (see below) may collect information which can be used to identify your computer and its browser program or any mobile devices that you use to surf the internet. The information is collected by installing small text files called "Cookies" and other, similar information technology techniques (which are comprehensively referred to in this document as "**Cookies**"). In

addition to other functions, when you visit the Site again, the Cookies previously stored allows us to recognize your browser. Cookies may store unique identifiers, user preferences, or other information as described below.

The Cookies installed by the Website are broken down as follows:

- **Pirelli Cookies:** these are strictly related to browsing the Website and guarantee normal use of it. Among other things, they make it possible to track your choices (the choice of language or size of typeface used), to recognise the computer or mobile device when a new connection is made and to manage a browsing session (allowing continuous connection to the area protected by your login details for the entire duration of the browsing session). They are also used for statistical purposes to improve the service and the use of the Website by its users as well as to generally measure the effectiveness of our Website. For instance, it may be used to ensure that the products advertised on our Website are available in your area or that we are not showing you the same ads repeatedly. You can block the use of cookies by activating the settings in your browser. The Help feature on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. If you choose to withhold consent, or subsequently block cookies, and some site features or functions may not function correctly you may not be able to access all or part of the content of our Website.
- **Third party Cookies:** these are Cookies installed on the Website by third parties and include the following types of cookies:
  - **Google Analytics:** We use Google Analytics which allows us to see information on user website activities including, but not limited to page views, source and time spent on our Website. This information is depersonalized and is displayed as numbers, meaning that it cannot be tracked back to individuals. You may opt-out of our use of Google Analytics by visiting the [Google Analytics opt-out page](#).
  - **Third party Cookies:** We allow Cookies installed through the Website by third parties for marketing purposes and specifically to send you advertising messages that are customised to match your preferences, according to the information contained in the visited web pages (e.g. a visit to the pages of this Website or other websites that use the same Cookies). We use Google AdWords Remarketing to advertise Pirelli across the Internet and to advertise on third party websites (including Google) to previous visitors to our Website. AdWords remarketing will display ads to you based on what parts of the Pirelli Website you have viewed by placing a cookie on your web browser. It could mean that we advertise to previous visitors who haven't completed a task on our site or this could be in the form of an advertisement on the Google search results page, or a site in the Google Display Network. This cookie does not in any way identify you or give access to your computer or mobile device. The cookie is only used to indicate to other websites that you have visited a particular page on our Website, so that they may show you ads relating to that page. If you do not wish to participate in our Google AdWords Remarketing, you can opt out by visiting [Google's Ads Preferences Manager](#).
  - **Targeted Advertising.** Pirelli does not collect third party online behavioral web browsing information (data collected over time **across** web sites owned or operated by different

entities for purposes of delivering advertising based on preferences or interests known or inferred from the data collected) for use by Pirelli or our clients for advertising purposes (often referred to as Online Behavioral Advertising or OBA). Pirelli does, however, use third-party advertising vendors that use first-and third-party cookies to gather information as individuals interact with Pirelli's and other websites (i.e., over time and across websites) and evaluate the possibility to send you advertising messages that are customised to match your preferences, according to the information contained in the visited web pages. Specifically, using these cookies, data is collected on: (i) actions performed by unique visitors on the Website (e.g. number of pageviews, type of articles visualized, searches etc.); (ii) socio-demographic information provided by users, such as age range and gender; (iii) device used (e.g. mobile vs desktop, operating system, browser etc.); and (iv) information relating to advertising content, such as number of banners viewed by users. We do not attempt to combine this data with other personal information we collect on our Website. We treat this information as personal information when it is associated with your account or contact information. As mentioned above, you may set your computer's Internet browser settings so you will be notified when you receive any third party cookie, which includes Pirelli's cookies, and be given the choice to block the cookie. In addition, there are also other controls within certain browsers or available through third parties that enables more extensive blocking of cookies.

- **DO NOT TRACK:** Some new browsers have a “do-not-track” feature. When this feature is turned on, Pirelli treats this as if you had opted out of our online advertising products. To learn how to manage your browser based settings and cookies, please visit:
  - [Google Chrome](#)
  - [Mozilla Firefox](#)
  - [Microsoft Internet Explorer](#)
  - [Safari](#)

Additionally, you can disable or delete similar data used by browser add-ons, by changing the add-on's settings or visiting the website of its manufacturer. U.S. residents can generally opt-out from receiving personalized ads from third party advertisers and ad networks who are members of the Digital Advertising Alliance by visiting the [DAA opt-out page](#). Canadian residents can generally opt-out of receiving personalized ads from third party advertisers and ad networks who are members of the Digital Advertising Alliance of Canada. Please visit the [DAAC opt-out page](#) for more information.

**Commercial Electronic Communications (Emails and Text Messages)**. We will use your email address to communicate with you via email. This includes our sending to you of promotional emails as well as other emails about the Website and your orders and deliveries. In addition, by providing a mobile device number, you consent to receiving autodialed text messages from us for service related messages. We may send marketing text messages to you with your additional consent.

### **Sharing of personal information.**

Your information may be made available to third-parties or service providers to fulfill the purposes for which it has been collected or as set forth in this Privacy Policy. Pirelli may share your personal information as follows:

- **Third party or affiliated service providers.** Except as permitted in this Privacy Policy, unless we have your express consent, we will not sell, rent, share or trade your personal information to or allow access to your personal information by any third party, except to service providers or vendors that we use to facilitate or outsource one or more aspects of the operation of our Website or our business. These service providers are subject to confidentiality agreements with us and other legal restrictions that prohibit their use of the information we provide them for any purpose other than to facilitate the specific outsourced related operation, unless you have explicitly agreed or given your prior permission to them for additional uses.
- **As permitted or required by law.** From time to time, we may be required to provide personal information in response to a valid court order, subpoena, government investigation, or as otherwise required by law. We also reserve the right to report to law enforcement agencies or others any activities that we, in good faith, believe to be unlawful or in violation of our Terms of Use. We may release certain personal information when we believe that such release is reasonably necessary to protect the rights, property, and safety of others and ourselves, or to detect, prevent, or otherwise address fraud, security, or technical issues.
- **Business transaction.** In the event that we intend to sell or transfer ownership or control of any or all of our business, operations or services to a third party, we reserve the right to disclose your personal information to a potential buyer both before and after the purchase. In the event the sale does not go through, we will require the potential purchaser to not use or disclose your personal information in any manner whatsoever and to completely erase the same.
- **Online Marketing.** As described above, third party advertising companies may use cookies and similar technologies to collect information on the Website, app, or similar service to deliver targeted advertising to you on our or other sites and services.

### **Access to Your Information and Choices**

You can access, correct, or delete certain information we have relating to you, such as the contact information you provide us as described above, by contacting us at [privacy.nafta@pirelli.com](mailto:privacy.nafta@pirelli.com). We may not be able to accommodate every request to change, correct, or delete certain information if we believe this would violate any law or other legal requirement, or otherwise cause the information to be incorrect.

You can limit the communications that Pirelli sends to you. To opt-out of commercial emails, simply click the link labeled “unsubscribe” at the bottom of any email we send you. Please note that even if you opt-out of promotional emails, we may still need to contact you with important information about your account, in accordance with applicable data protection laws (and for Canadian residents only, such will be in accordance with the Canadian anti-spam legislation). If you have any questions about your choices or if you need any assistance with opting-out, please contact us via email to [privacy.nafta@pirelli.com](mailto:privacy.nafta@pirelli.com). You can also write us at the address in the [How to Contact Us](#) section below. If you send us a letter, please provide your name, address, email address, and information about the communications that you do not want to receive.

**Transfer of Personal Information Outside of your Home Country** In some cases, personal information of our Website users may be disclosed, processed and stored outside your home country, including in the United States, and therefore may be available to government authorities or regulatory agencies

under lawful orders and laws applicable there. If your information is transferred outside of your home country, we will take steps to ensure that your privacy and rights continue to be protected in compliance with this privacy policy, subject to the laws applicable there. You may contact us about your information that may be transferred outside of your home country and the handling of your information by our service providers outside of your home country by contacting Pirelli's Privacy Officer at [privacy.nafta@pirelli.com](mailto:privacy.nafta@pirelli.com).

**Privacy Policies of Third Parties.** This Privacy Policy only addresses the use and disclosure of information by Pirelli. Other websites that may be accessible through this Website have their own privacy policies and data collection, use and disclosure practices. We encourage you to familiarize yourself with the Privacy Policies provided by all third parties prior to providing them with information.

**No Information from Minors.** This Website is not directed to children under the age of 13. If you are U.S. resident and under the age of 13 or a Canadian resident and you are a minor (persons under the age of majority in their province or territory of residence) ("Minor"), please do not attempt to register with us at this Site, or provide any personal information about yourself to us. If we learn that we have collected personal information from a Minor, we will promptly delete that information. If you believe we have collected personal information from a Minor, please contact us at [privacy.nafta@pirelli.com](mailto:privacy.nafta@pirelli.com) or call us at 1- (212) 497-8847.

**Security of Personal Information.** We will use physical, technical, and administrative security measures to protect your personal information against unauthorized access. However, since the internet is not a 100% secure environment, we cannot warrant, guarantee, or ensure the security of any information you transmit to us. There is no guarantee that the information may not be accessed, disclosed, altered, or destroyed by a breach of our physical, technical, or administrative safeguards. It is your responsibility to protect the security of your login information, and we recommend that you use a unique password for our site that is different from the password you may use on any other site. Please be careful whenever sending personal information to us via e-mail. E-mail is generally not a secure means of transferring information. We therefore cannot guarantee that this information will not be lost or used in a fraudulent manner and we encourage the use of e-mail encryption to communicate with us.

**California Privacy Rights.** Under California's "Shine the Light" law, California residents who provide personal information in obtaining products or services for personal, family, or household use are entitled to request and obtain from us once a calendar year information about the consumer information we shared, if any, with other businesses for their own direct marketing uses. If applicable, this information would include the categories of customer information and the names and addresses of those businesses with which we shared customer information for the immediately prior calendar year (e.g. requests made in 2016 will receive information regarding 2015 sharing activities).

To obtain this information, please send an email request to [privacy.nafta@pirelli.com](mailto:privacy.nafta@pirelli.com) with "Request for California Privacy Information" on the subject line and in the body of your message. We will provide the requested information to you at your e-mail address in response. Please be aware that not all information sharing is covered by the "Shine the Light" requirements and we may only include information on covered sharing in our response.

**Change of Privacy Policy.** Our Privacy Policy may change from time to time. We will post any privacy policy changes on our Website and, if the changes are significant, we will provide a more prominent notice. The date the privacy policy was last revised is identified at the top of the page.

**How to Contact Us.** If you have questions or concerns regarding this Privacy Policy, or if you wish to review, edit your personal information or request that we delete personal information stored in the databases we actively use, please contact: [privacy.nafta@pirelli.com](mailto:privacy.nafta@pirelli.com). If you send us a letter, please provide your name, address, email address, and detailed information about the change you would like to make.