

PRIVACY NOTICE/YOUR PRIVACY RIGHTS

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Table of Contents

1. Sources of Personal Data
2. Types of Personal Data We Collect
3. How We Use Personal Data
4. To Whom We Disclose Personal Data
5. Cookies and Other Tracking Technologies
6. Data Security, International Sharing and Data Retention
7. Children's Privacy and Interacting with us on Behalf of Third Parties
9. Information relating to Processing of Applicants' data
10. Processing of Personal Data in connection with Product Security Vulnerability Reporting
11. Data Subject Rights
12. Contact Information
13. How we comply with U.S. State Consumer Privacy Laws
14. Supplemental Information for the EEA, Switzerland, and the UK
15. Supplemental Country-Specific Information

PRIVACY NOTICE/YOUR PRIVACY RIGHTS : SUMMARY

This Privacy Notice describes how Lincoln Electric Company and its subsidiaries and affiliates process Personal Data collected from Business Contacts (including personnel of distributors, business partners, vendors, and customers), individuals interacting with our Digital Properties, Applicants for positions with us, and individuals reporting product security vulnerabilities. It does not apply to data relating to current or former employees, or to data obtained by third parties independently from Lincoln Electric. Lincoln Electric is committed to protecting the privacy of Personal Data and may update this Notice from time to time; where required by law, we will obtain your consent or contact you directly if we make material changes.

1. Sources of Personal Data: We collect Personal Data directly from you, automatically through cookies and similar tracking technologies (according to our Cookie Policy, from third parties such as trade show organizers and business partners, and from publicly available sources. We may

combine information received from these various sources and use or disclose the combined information for the purposes identified in this Notice. For further details, please click [here](#).

2. Types of Personal Data We Collect: We collect identifiers, records, demographic and commercial information, internet activity, geolocation, audio/visual information, professional and education information, inferences, applicant data, vulnerability report data, and sensitive data. Sensitive data may include Social Security numbers, passport numbers, account log-in information, citizenship or immigration status, and information about criminal convictions to the extent permissible under applicable law. For further details, please click [here](#).

3. How We Use Personal Data: We use Personal Data to provide products and services, respond to inquiries, operate and improve our business, conduct marketing and targeted advertising, manage accounts and digital tools, support premises security, recruit Applicants, and handle vulnerability reports. We may use AI (as defined herein) or general-purpose AI tools to support certain processing activities, subject to appropriate safeguards including human oversight where required. We may also use and disclose anonymized, de-identified, or aggregated information for any purpose permitted by law. For further details, please click [here](#).

4. To Whom We Disclose Personal Data: We may disclose Personal Data to affiliates and subsidiaries within the Lincoln Electric group, third-party service providers, professional consultants, vendors, law enforcement and government agencies, persons impacted by actual or suspected security vulnerabilities, corporate transaction parties, business partners (including advertisers and ad platforms), the public, and other entities to which you consent. We seek to ensure that service providers are bound by contractual obligations to protect the confidentiality and security of Personal Data and to only process it on our documented instructions. For further details, please click [here](#).

5. Cookies and Other Tracking Technologies: We use cookies and similar technologies to collect technical information about your device and browsing activity on our Digital Properties. We support the Do Not Track (DNT) browser setting, and further information is provided in our Cookie Policy and collect your consent where legally required. For further details, please click [here](#).

6. Data Security, International Sharing and Data Retention: We implement technical and organizational safeguards to protect your Personal Data, may transfer it internationally within the Lincoln Electric group and to service providers, including in the US and to jurisdictions which do not provide the same level of protection of personal data as your country of residence, subject to appropriate safeguards, and retain it only as long as necessary for the stated purposes or as required by law. You are responsible for safeguarding your username and password and should notify us immediately if you suspect unauthorized use of your login credentials. For further details, please click [here](#).

7. Children's Privacy and Interacting with us on Behalf of Third Parties: Our Digital Properties are not directed to children under the age of eighteen (or sixteen where permitted by applicable law), and we do not knowingly collect such children's Personal Data; if we become aware of inadvertent collection, we will delete it. If you interact with us on behalf of another

individual or entity, you must obtain their consent or have legal authority to share their Personal Data with us. For further details, please click [here](#).

8. External Links: Our Digital Properties may contain links to external websites or other online services, including those embedded in third-party advertisements, that we do not control. We are not responsible for the privacy practices or data collection policies of such third-party services; please refer to their own privacy policies. For further details, please click [here](#).

9. Information relating to Processing of Applicants' data: This section specifically addresses how we process Personal Data of job Applicants who submit applications for available positions, whether as prospective employees, independent consultants, or advisers. Lincoln Electric processes Applicant Data to manage applications, assess suitability, conduct interviews and assessments, comply with legal obligations, and where applicable, consider Applicants for future opportunities. Unsuccessful Applicants' data will be deleted in accordance with our retention policy, generally within a defined period of the closure of the application process. For further details, please click [here](#).

10. Processing of Personal Data in connection with Product Security Vulnerability Reporting: This section addresses how we process Personal Data of Vulnerability Reporters (security researchers, customers, suppliers, and representatives of competent authorities) who submit reports about product security issues to our PSIRT contact. Reports are treated as confidential and access is restricted to authorized PSIRT members and approved stakeholders on a need-to-know basis. For further details, please click [here](#).

11. Data Subject Rights: Depending on your jurisdiction and relationship with us, you may have certain rights regarding your Personal Data, including the right of access, rectification, objection, portability, restriction, erasure, the right to withdraw consent, and the right to lodge a complaint with a supervisory authority. You may exercise these rights by contacting us using the details provided in Section 12 (Contact Information). For further details, please click [here](#).

12. Contact Information: This section provides the contact details for reaching us with questions or concerns regarding this Privacy Notice or our privacy practices, including by mail or email. For further details, please click [here](#).

13. How we comply with U.S. State Consumer Privacy Laws: Depending on applicable U.S. state privacy law, you may have rights to confirm processing and access your data, correct inaccuracies, request deletion, obtain portable copies, opt out of targeted advertising, and opt out of automated decision-making that produces legal or similarly significant effects. Lincoln Electric does not sell your personal information for monetary or other valuable consideration. You may also designate an authorized agent to submit privacy requests on your behalf, and you have the right to appeal any decision we make regarding your request. For further details, please click [here](#).

14. Supplemental Information for the EEA, Switzerland, and the UK: This section provides additional information required under EEA, Swiss, and UK data protection laws, including on the identity of the data controller, the legal bases for processing (contract performance, legitimate interests, legal obligation, consent, and vital interests), your enhanced data protection rights, and

the safeguards in place for international data transfers such as Standard Contractual Clauses. You may contact the Data Protection and Privacy Coordinator for Europe at privacy@lincolnelectric.com. For further details, please click [here](#).

15. Supplemental Country-Specific Information: This section provides country-specific disclosures that supplement the Notice for residents of certain countries, currently including Canada. For Canadian residents, Lincoln Electric relies on consent (express or implied) as the basis for processing, except where otherwise permitted by law, and complies with CASL for commercial electronic messages. For further details, please click [here](#).

PRIVACY NOTICE/YOUR PRIVACY RIGHTS : FULL VERSION

Lincoln Electric Company, together with its subsidiaries and affiliates (collectively, “Lincoln Electric”, “**Company**,” “**us**,” “**we**,” or “**our**”) is committed to protecting the privacy of Personal Data (i.e., information reasonably related to a specific individual).

This Privacy Notice describes how we process Personal Data collected from “**Business Contacts**,” which includes:

- **Personnel** of our distributors, business partners, vendors, and customers;
- **Individuals** who interact with our websites and social media accounts, mobile applications or software, or engage with us via email, video-conferences and through other online properties (‘**Digital Properties**’); and
- **Individuals** who engage with us through in-person meetings, visits to our facilities, trade shows, etc. This also includes students, who engage with us to access specialized industry knowledge;
- Individuals who apply for a position with us either online or offline (“**Applicants**”), as detailed under [Section 9 \(Information relating to Processing of Applicants’ data\)](#); and
- Individuals who submit a report or otherwise correspond with our Product Security Incident Response Team (“**PSIRT**”) through our vulnerability reporting web form about a product security issue, including security researchers, customers, suppliers, and representatives of competent bodies or authorities (“**Reporters**”), as detailed under [Section 10 \(Processing of Personal Data in connection with Product Security Vulnerability Reporting\)](#).

This Privacy Notice does not apply to:

- a. Personal Data relating to our current/former employees;
- b. Personal Data obtained by distributors and other third parties directly from you or from sources other than Lincoln Electric, unless such data is then disclosed to and retained by Lincoln Electric.

Changes: We may update this Privacy Notice from time to time. Any updated Privacy Notice will be effective when posted. Please check this Privacy Notice periodically for updates. Where required by law, we will obtain your consent or contact you directly if we make material changes to this Privacy Notice.

1. Sources of Personal Data

We collect Personal Data about you from the following sources:

- A. **Directly from you.** We may collect Personal Data you provide to us directly (electronically, in writing, or verbally), such as when you place or customize orders through our websites, contact us through email, for example to ask for product information or participate in training or welding education, sign up for offers or newsletters, respond to surveys, questionnaires, or assessments, apply for a position, or sign up for a Lincoln account or other services.
- B. **Automatically.** We may automatically collect information or inferences about you and your devices when you visit our Digital Properties. To do this, we may use cookies and similar tracking technologies. For more details, please see our Cookie Policy.
- C. **From third parties.** We may collect Personal Data from various third parties, including from distributors (for example, to facilitate or incentivize sales), as well as from third parties that provide services to us, such as trade show organizers, mailing or other list service providers, vendors and business partners. We may also receive Personal Data from Lincoln Electric affiliated companies and subsidiaries.
- D. **From publicly available sources.** We may collect Personal Data from publicly available sources, such as from public profiles and websites.

We may combine information that we receive from the various sources described in this Privacy Notice, including third party sources, and use or disclose the combined information for the purposes identified below.

2. Types of Personal Data We Collect

We may collect the following types of Personal Data about you and may share this Personal Data with service providers and contractors to the extent permissible under applicable law:

- A. **Identifiers**, such as your name, business contact information (e.g., email address, physical address, telephone) and other relevant contact information; Company IDs; device identifiers (e.g., cookie IDs and IP address); and other identifiers used to register with, download, or access our Digital Properties.
- B. **Records about you**, this includes signatures, the timing, method, and content of our communications (e.g., emails, calls, and online chats); financial data, including credit and income history; information regarding commissions, bonuses, or discounts; any information you share when interacting with our Digital Properties; and records of your visits to our premises.
- C. **Demographic information**, such as age (including birthdates) and gender.

- D. Commercial information**, this includes transactional data such as order details, shipping and billing addresses, product serial numbers, and histories for purchases, returns, warranty claims, and registrations; information on products considered, subscription details, and distributor leads. Payment information, including credit card numbers and security codes, is collected and immediately forwarded to our processing vendor, Cybersource, for secure transaction handling. Lincoln Electric will not access or store this information. For customers of connected welding or related equipment and services, we collect data regarding the operation, location, maintenance, and performance of that machinery.
- E. Internet or other electronic network activity information**, this includes log-in credentials, browser type, search and browsing history, and website activity such as content viewed and technical interactions (e.g., mouse movements, clicks, taps, or swipes). We use cookies and similar technologies to monitor these digital interactions. This category also encompasses marketing and purchasing preferences, interests, and Lincoln Electric account settings
- F. Non-precise geolocation data**, such as your location as derived from your IP address.
- G. Audio, Electronic, and Visual Information**, this includes photographs, audio, and video recordings captured during Company events, meetings, and business calls (such as customer service calls, training sessions, conferences, or educational events). We also collect recordings of conversations and discussions held during these events and may use automated tools, including AI-based technologies, to generate transcripts, summaries, minutes, and other records of such conversations and discussions. We also collect sensory data gathered during the testing and evaluation of Lincoln products. This also includes CCTV footage obtained from our CCTV cameras installed in some of our premises (e.g., manufacturing floors).
- H. Professional or employment-related information**, such as job title, organization, professional licenses, credentials, affiliations, and other professional information.
- I. Education information** such as when you attend our trainings or educational programs.
- J. Inferences** drawn from any of the information we collect about your preferences, behavior, or interactions, including to assess the level of interest in our products and services based on frequency of visits and contact, determine your preferred frequency for receiving offers, improve customer service, and better understand and respond to requests.
- K. Applicant data**, including the personal data provided by you, generated or otherwise collected by us as part of the recruitment process, as further detailed under [Section 9](#) (*Information relating to Processing of Applicants' data*).
- L. Vulnerability Report data**, including information relating to you as reporter of a vulnerability, including your contact details, the content of the report itself, any supporting material, and follow-up data, as further detailed under [Section 10](#) (*Processing of Personal Data in connection with Product Security Vulnerability Reporting*).

M. Sensitive data including the following:

1. Social Security number, driver's license number, or passport number.
2. Account log-in information.
3. Content of mail, email, and text messages where we are not the intended recipient (such as messages that we host but are not sent to us).
4. Citizenship, citizenship status, or immigration status.
5. Information about criminal convictions and offences.

3. How We Use Personal Data

We may use Personal Data for the following purposes:

- A. To provide you or your company with our products, services, and related information:** We use Personal Data to provide you or your company, as our customer, with products and services, or information pertaining to them. Furthermore, we utilize Personal Data to deliver training programs and specialized welding knowledge to students. Additionally, we process Personal Data during routine business interactions with vendors, suppliers and distributors.
- B. Contact Us, Ask the Experts and other Interactions:** We use Personal Data you provide in connection with an inquiry or comment, including your name, and contact information (e.g., address, phone number and email address) with the purpose of replying to your inquiry (whether or not a purchase is made). Where appropriate, we may use AI or general-purpose AI tools to support communications (generate transcripts, summaries, etc). These tools operate with appropriate safeguards, including human oversight where required.
- C. For our internal business purposes:** We use your Personal Data for day-to-day business activities, such as maintaining accounting and document records, enforcing Company policies, and generating management reports. This data also supports our IT security, internal audits, data analytics, and corporate transactions. We may also use automated tools and technologies to support internal administrative and operational processes. Additionally, we process this information to ensure compliance with legal obligations, court processes, and our own internal procedures.
- D. For our internal research and improvement purposes:** We use Personal Data to verify and improve the quality and safety of our products and services, including our Digital Properties. We use Personal Data to conduct market research and data analytics; we also use artificial intelligence and machine learning models (collectively, "AI") to improve existing products and services and develop new ones.

As part of this, we may analyze communications and interactions to improve customer service, better understand customer needs, and enhance our systems and processes.

Additionally, we use Personal Data to debug, repair, and maintain our systems, networks, and equipment.

- E. Questionnaires and Surveys:** We ask Business Contacts to complete optional online surveys and opinion polls to obtain input, for example, relating to our present or planned products and services and their use.
- F. For legal, safety, or security reasons:** We process Personal Data to comply with legal, reporting and similar requirements; as well as our internal policies and procedures; investigate and respond to claims against us, our personnel, and our customers; establish, exercise or defend legal claims; processing warranty claims, protect our, your, our customers', and other third parties' safety, property or rights; detect, prevent, and respond to security incidents and health and safety issues (including managing spread of communicable diseases); and protect against malicious, deceptive, fraudulent, or illegal activity.
- G. Corporate Transactions:** We use Personal Data to comply with requests from prospective or actual purchasers interested in Lincoln Electric or its assets, or in relation to a prospective or actual purchase of companies or assets by Lincoln Electric including through a sale in connection with bankruptcy and other forms of corporate change, or in the context of investment or other participation in joint ventures.
- H. For marketing and targeted advertising:** If you provide your email address and (if required) consent to receive marketing information, we send you useful information about Lincoln Electric products and welding and cutting, such as advertisements, videos, contests, rebates and e-newsletters to your email address. To better understand your preferences, we use cookies and tracking tools to analyze your interactions with our Digital Properties. This allows us to personalize advertising (such as identifying you across devices or building custom audiences) and send tailored newsletters, advertisements, surveys, promotions, or event invitations. All marketing data is collected in accordance with this Privacy Policy and our Cookie Policy. You can unsubscribe at any time via the link in our emails, by responding "STOP" to a text message, or by contacting us using the information in Section 10 (*Contact Information*). See Section 15 (*Supplemental Country-Specific Information*) for additional information applicable to your jurisdiction of residence.
- I. To manage myLincoln Account:** If you create an account on a Lincoln Electric Digital Properties, we collect the account information that you submit, such as your name, email address, and log-in information and information regarding your orders, including your history of purchases.
- J. Operate Mobile Applications and Internet Connected Devices:** When you access or use a Lincoln Electric mobile application, we collect Personal Data such as your first and last names, email addresses, and online identifiers to register with, download, or access the relevant mobile application. We monitor, record, and analyze the operation, location, maintenance and/or performance of welding and other equipment made, sold or provided by Lincoln Electric and connected to the mobile application to provide you the service. We de-

identify or aggregate, and analyze this data in order to develop more effective and efficient products and services.

- K. To facilitate and manage video teleconferencing for training, meetings, and corporate events for business purposes:** We record the content, conversations, and discussions in the course of these video teleconferencing events. Such records may be stored or retained by us or our third-party service providers for the following purposes: training; documenting corporate decision-making processes; making the video teleconferencing events available to registered participants of the events to allow them to review the events after they have finished.
- L. Locating a Distributor:** If you use our Digital Properties to locate a nearby Lincoln Electric distributor, we will collect your location information, which may be retained and analyzed for statistical business reasons.
- M. Customer and Investor Updates:** We may use your name and contact information (address, phone number and email address) so that updates to our products, safety data sheets (SDS), safety and corporate investor information may be sent to you.
- N. For recognition purposes:** We may use Personal Data to provide public recognition, awards, and/or celebrations of achievements, including through our Digital Properties and Company functions and events.
- O. To maintain the safety and security of our premises** (manufacturing floors, administrative offices, logistics hubs, etc.): We may process Personal Data (such as CCTV footage) to ensure the security and safety of the physical infrastructure and assets from unauthorized access, accidental damage, etc.
- P. For recruitment purposes,** as further detailed under [Section 9](#) (*Information relating to Processing of Applicants' data*) below and, where applicable, subject to relevant local recruitment requirements.
- Q. For vulnerability reporting and report handling,** as further detailed under [Section 10](#) (*Processing of Personal Data in relation to vulnerability reporting*) below and, where applicable, subject to relevant local requirements.

Where appropriate, we may use AI or general-purpose AI tools to support the processing activities. These tools **are used in accordance with applicable laws and are subject to appropriate technical and organisational** safeguards, including human oversight where required.

We may use and disclose anonymized, de-identified, or aggregated information for any purpose permitted by law.

4. To Whom We Disclose Personal Data

We may disclose the categories of Personal Data described above to the following categories of recipients:

A. Affiliates and subsidiaries (Intra-Group)

We share Personal Data within the Lincoln Electric group for all purposes described in this Privacy Notice. A list of all Lincoln Electric entities is available.

B. Third-Party Service Providers

We disclose Personal Data to third-party service providers working on our behalf to provide the products and services you request or support our relationship with you, such as IT providers, internet service providers, data and web hosting providers, software service providers, email marketing providers, payment processing companies, data analytics providers, and companies that provide business support services, financial administration, or event organization, shipping companies, as well as providers supporting us with logistics and AI services. Certain providers may also use such data to develop, improve, enhance, and train the systems, models, technologies, and services that underpin the functionality they provide, subject to applicable law. We may also share Personal Data with third-party service providers to help determine what marketing information may be useful to you or to help us make video teleconferencing events available.

We seek to ensure that these service providers are subject to legal and/or contractual obligations to protect the confidentiality and security of Personal Data, and to only process your Personal Data to provide the requested services and only act on our documented instructions.

C. Professional consultants

We may disclose your Personal Data to professional consultants, such as accountants, lawyers, financial advisors, and audit firms.

D. Vendors necessary to complete transactions you request, such as shipping companies and logistics providers.

E. Law enforcement, government agencies, and other recipients for legal, security, or safety purposes

We may disclose Personal Data to courts, tribunals, opposing parties, or other related parties and their professional advisors in response to court order, subpoena, civil discovery request, other legal process, or as otherwise required by law or to protect the rights, property or safety of Lincoln Electric, or of our Business Contacts, including by exchanging information with other companies for fraud prevention and credit risk reduction, sharing of security vulnerability information, and to enforce or apply our terms and conditions and other agreements or policies.

F. Other entities in connection with a corporate transaction

We may disclose Personal Data to other entities in connection with a prospective or actual corporate transaction, such as if we acquire assets of another entity, or sell or transfer all or a portion of our business or assets including through a sale in connection with bankruptcy and other forms of corporate change or in the context of investment or other participation in joint ventures. We may also disclose your Personal Data to their lawyers, or other professional advisors in relation to the above.

G. Business partners

We may disclose Personal Data to business partners for their own purposes, such as:

- Advertisers, ad platforms and networks, and social media platforms;
- Third parties whose cookies and tracking tools we use as described in our Cookie Policy; and
- Partners who work with us on promotional opportunities, including co-branded products and services, or for their own marketing purposes.
- We may also share data with other companies or vendors performing functions for Lincoln Electric, whereby these companies determine themselves the purposes and/or means of the processing and the lawfulness of the processing.

Where recipients use your Personal Data for their own purposes independently from us, we are not responsible for their privacy practices or personal data processing policies. You should consult the privacy notices of those third-party services for details on their practices.

H. The public

We may disclose Personal Data you choose to make public, such as when you have an opportunity to make comments regarding us or our products that we may share with the public, including comments on our blog posts and reviews on our product pages. Any Personal Data in comments, reviews, or other content that you share in public areas of our website may be read, collected, or used by other users or the public.

I. Entities to which you have consented to the disclosure.

5. Cookies and Other Tracking Technologies

We may collect technical information from and about your device (such as your browser type, operating system, IP address, and domain name) via cookies and other tracking technologies. Please see our Cookie Policy for further information.

We support the Do Not Track (DNT) browser setting, which allows users to indicate that they do not want websites to collect their personally identifiable information. We collect your prior consent where required under applicable law. Business Contacts located in Canada should also see [Section](#)

[15 \(Supplemental Country-Specific Information\)](#) for additional information regarding cookie consent requirements that apply to them.

6. Data Security, International Sharing and Data Retention

Lincoln Electric has implemented a variety of technical and organizational practices designed to help safeguard your Personal Data. Although we maintain security safeguards, no security measures or communications over the Internet can be 100% secure, and we cannot guarantee the security of your information. Some of our Digital Properties may require registration and login. You are responsible for safeguarding your username and password and all activities occurring under your account. Notify us immediately if you suspect unauthorized use of your login credentials.

We may share your Personal Data within the Lincoln Group and with our service providers for the purpose outlined above. Some of these recipients may be located in countries that do not provide the same level of data protection as your home jurisdiction. In such cases, we endeavour to bind these recipients to safeguards aimed at protecting the Personal Data.

We retain your Personal Data for as long as necessary to fulfill the purposes we have outlined above or as required by applicable law. For example, we retain your Personal Data for the duration of our engagement and a reasonable period thereafter to facilitate contracts and maintain business relationships. We also retain the Personal Data to ensure the ongoing legality, safety, and security of our products and services; resolve disputes and enforce our agreements; or otherwise in accordance with our internal retention procedures.

Once you have terminated your relationship with us, we may retain your Personal Data in our systems and records in order to ensure adequate fulfillment of surviving provisions in terminated contracts or for other legitimate business purposes, such as to enable easier future user onboarding, demonstrate our business practices and contractual obligations, or provide you with information about our products and services in case of interest. If you would like to know more about the retention periods applicable to your Personal Data, you can contact us using the details provided in Section 11 (*Contact Information*) below.

7. Children's Privacy and Interacting with us on Behalf of Third Parties

Our Digital Properties are not directed to children under the age of eighteen (or sixteen where permitted by applicable law), and we do not knowingly collect such children's Personal Data. We may ask you to confirm that you have not and will not provide such information to us or through our Digital Properties. If we become aware that we inadvertently collected such information, we will delete it from our records.

Whenever you interact with us on behalf of another individual or entity, such as if you refer a friend to us, you must obtain their consent (or have the legal authority without consent) to share their Personal Data with us.

8. External Links

Our Digital Properties may contain links to external websites or other online services that we do not control, including those embedded in third-party advertisements or sponsor information. We are not responsible for the privacy practices or data collection policies of such third-party services. If you have questions about their privacy practices, please refer to the privacy policies of those websites.

9. Information relating to Processing of Applicants' data

This section specifically addresses the processing of Personal Data relating to job applicants ("**Applicants**") who submit applications for available positions at Lincoln Electric, whether as prospective employees, independent consultants, or advisers. This section should be read in conjunction with the rest of this Privacy Policy. Where a topic is not specifically addressed below, the general provisions of this Privacy Policy apply.

Purpose of processing

If you apply for a role or position through our website or careers portal, or otherwise interact with us about employment opportunities, we process your Personal Data to manage your application, assess your suitability, communicate with you, conduct interviews and assessments, comply with legal obligations or as necessary for the establishment, exercise, or defense of legal claims, and, where applicable, consider you for future opportunities.

Sources of Applicant Data

Lincoln Electric generally collects Personal Data directly from Applicants, for example via a dedicated online talent management platform or via email communication. Lincoln Electric may also receive Personal Data about Applicants from third parties who provide services to us, such as third-party staffing or recruiting firms.

Categories of Personal Data Do We Collect About Applicants

In connection with your application, as permitted under applicable law, Lincoln Electric may collect and process the categories of Personal Data listed under [Section 2](#) (*Types of Personal Data We Collect*), including in particular the following Personal Data you provide or which are generated during the recruitment process ("**Applicant Data**"):

- Identification and contact information: name, surname, address, email address, telephone number.
- Professional background: CV/résumé, employment history (including job titles, salary and benefits packages, and relevant working hours), professional experience, interests, and professional certifications and credentials.
- Education and qualifications: academic history, qualifications (professional and otherwise), and language skills.

- Right-to-work information: citizenship, passport data, visa data, details of residency or work permit for the location to which you are applying.
- Background and reference information: where permitted or otherwise authorized by applicable laws, information received from third parties may include the results of background checks and referencing.
- Disability information: where required by law (for example, in countries where companies are required to employ a certain number of people with disabilities), Lincoln Electric may collect certain information on disabilities from Applicants.

Sensitive/Special Categories of Personal Data

Lincoln Electric does not generally collect Sensitive/Special Categories of Personal Data from Applicants. However, in countries where the law requires companies to employ a certain number of people with disabilities, Lincoln Electric may collect certain disability-related information from Applicants for the purpose of complying with such legal requirements.

To Whom We Disclose Applicant Data

The general provisions on sharing of Personal Data set out in [Section 4](#) (*To Whom We Disclose Personal Data*) apply equally to Applicant Data, including intra-group sharing and disclosure to third-party service providers (such as staffing or recruiting firms), as well as any required disclosures, legal compliance, and corporate transactions.

Data Security, International Sharing and Data Retention

The general provisions set out in [Section 6](#) (*Data Security, International Sharing and Data Retention*) apply equally to Applicant Personal Data. Personal Data of unsuccessful Applicants will be deleted in accordance with the normal document retention policy at Lincoln Electric. Where your application is successful, your Personal Data will be retained and processed in accordance with Lincoln Electric's employee privacy notice.

Applicants' Rights

As an Applicant, you benefit from the rights described in this Privacy Notice, in particular under [Section 11](#) (*Data Subject Rights*) and, as applicable, [Section 13](#) (*How we comply with U.S. State Consumer Privacy Laws*) and [Section 14](#) (*Supplemental Information for the EEA, Switzerland, and the UK*). These rights include, as applicable, the right of access, rectification, objection, portability, restriction, erasure, the right to withdraw consent, and the right to lodge a complaint with a supervisory authority. If you wish to exercise any of your rights, please contact us using the details in [Section 12](#) (*Contact Information*).

Supplemental Information for the EEA, Switzerland, and the UK

The provisions of [Section 14](#) (*Supplemental Information for the EEA, Switzerland, and the UK*) provides further details regarding the processing of Applicant Data under EEA, Swiss and UK data protection legislation, in particular regarding the controller of Applicant Data (the legal entity to which you submit your application), the legal bases of the processing (Consent, Legitimate

interests, Contract and Legal obligation) and appropriate safeguards in place for international data transfers and how to obtain a copy thereof.

Supplemental Country-Specific Information

[Section 15](#) (*Supplemental Country-Specific Information*) provides disclosure supplementing the above information for residents of certain countries such as Canada.

10. Processing of Personal Data in connection with Product Security Vulnerability Reporting

This Section specifically addresses the processing of Personal Data of any individual (security researcher, customer, supplier, representative of competent authorities and bodies designated under applicable law such as EU Cyber Resilience Act) that submits a report or otherwise corresponds with Lincoln Electric's Product Security team ("PSIRT") about a product security issue (a "**Vulnerability Reporter**"). This section should be read in conjunction with the rest of this Privacy Policy, and any vulnerability reporting policy which may be in effect from time to time. Where a topic is not specifically addressed below, the general provisions of this Privacy Policy apply.

Purpose of Processing

Lincoln Electric processes Personal Data of Vulnerability Reporters to manage vulnerability reports (including receipt, acknowledgement, logging, tracking, and follow-up of the reports); review, validate, classify, and remediate reported issues; comply with legal and regulatory obligations, including vulnerability and incident reporting under applicable law such as the EU Cyber Resilience Act and other applicable notification requirements; voluntarily notify third parties of vulnerabilities; protect the reporting channel against spam and abuse; and, with the Vulnerability Reporter's consent, publicly credit the Reporter. Vulnerability Reporter Personal Data is not used for marketing and is not sold.

Sources of Vulnerability Reporter Data

Lincoln Electric collects Vulnerability Reporter Data:

- directly from Vulnerability Reporters, including through the vulnerability reporting web form;
- automatically, including case records, timestamps, and acknowledgements generated by our systems; and
- from third parties, where a report reaches us through a competent body or authority, regulator, supplier, customer, or internal escalation.

Categories of Personal Data Collected from Reporters

In connection with vulnerability reporting, Lincoln Electric may collect and process the Personal Data listed under [Section 2](#) (*Types of Personal Data We Collect*), including following Personal Data relating to Vulnerability Reporters: identification and contact details, the content of the report itself (including a description of the vulnerability, the affected product, severity and impact

assessments, and any known exploitation or mitigation information), any supporting material (such as logs, screenshots, or proof-of-concept files submitted alongside the report), and follow-up data (covering acknowledgements, correspondence, case tracking references, internal review and escalation records, and technical verification data collected through the submission form). Vulnerability Reporters should include in their reports only information necessary to understand and reproduce the issue. If a Reporter does not provide a contact method, Lincoln Electric may be unable to progress a report that lacks sufficient information. If a report contains Personal Data about third parties, Reporters should ensure that they are entitled to share it and minimize it; Lincoln Electric processes such data only as needed to investigate the reported issue.

To Whom We Disclose Vulnerability Reporter Data

The general provisions on sharing in [Section 4](#) (*To Whom We Disclose Personal Data*) apply. In addition, specifically for vulnerability reporting, reports are treated as confidential and access is restricted to authorized PSIRT members and approved stakeholders on a need-to-know basis, including:

- Internal teams: PSIRT, product and engineering experts, legal, and security/business leadership where escalation is required;
- Lincoln Electric group companies: where the affected product or report handling involves another entity;
- Service providers acting as processors, including the host of the case-management system;
- Competent bodies and supervisory authorities under applicable law, such as CERTs/CSIRTs, ENISA, regulators, courts, and law enforcement where required by law or voluntarily disclosed; and
- Coordinated disclosure participants: affected vendors, suppliers, and competent bodies and authorities, where necessary to investigate and remediate the issue.

Any regulatory reports we create focus on the vulnerability itself and Vulnerability Reporter Data is included only where strictly necessary.

Data Security

Vulnerability reports are classified as confidential. Access to cases and attachments is restricted to authorized PSIRT members and approved stakeholders. Any Personal Data contained in or associated with a vulnerability report is handled in accordance with [Section 6](#).

Data Retention

Personal Data is retained only as long as necessary for the purposes described in this section, including demonstrating compliance with legal obligations. The general retention provisions in [Section 6](#) (*Data Security, International Sharing and Data Retention*) apply.

Reporters' Rights

As a Reporter, you benefit from the rights described in this Privacy Notice, in particular under Section 11 (*Data Subject Rights*) and, as applicable, Section 13 (*How we comply with U.S. State Consumer Privacy Laws*) and Section 14 (*Supplemental Information for the EEA, Switzerland, and the UK*). If you wish to exercise any of your rights, please contact us using the details in [Section 12](#) (*Contact Information*).

Supplemental Information for the EEA, Switzerland, and the UK

The provisions of [Section 14](#) (*Supplemental Information for the EEA, Switzerland, and the UK*) further detail the processing of Vulnerability Reporter Personal Data under EEA, Swiss, and UK data protection legislation, in particular regarding the controller (the Lincoln Electric entity which is operating the vulnerability reporting platform, namely Lincoln Electric Company, the legal bases of the processing (legitimate interests in maintaining product security and protecting customers; legal obligation under EU CRA and other regulatory reporting; and consent for public credit of the Reporter), and appropriate safeguards in place for international data transfers and how to obtain a copy thereof.

11. Data Subject Rights

Depending on your jurisdiction and relationship with us, you may have certain rights regarding your Personal Data, including the right of access, rectification, objection, portability, restriction, erasure, the right to withdraw consent, and the right to lodge a complaint with a supervisory authority. You may exercise these rights by contacting us using the details provided in [Section 12](#) (*Contact Information*).

12. Contact Information

If you have questions regarding this Privacy Notice, please contact us at:

Data Privacy Coordinator

Lincoln Electric

5 Place le Châtelier

60700 Pont-Sainte-Maxence, France

privacy@lincolnelectric.com

13. How we comply with U.S. State Consumer Privacy Laws

Depending on applicable U.S. state privacy law, you may have the following privacy rights with respect to your personal information:

- To confirm whether or not we are processing your personal information and access such personal information.
- To correct inaccuracies in your personal information, taking into account the nature of the personal information and the purposes of the processing of your personal information.
- To delete personal information provided by, or obtained about, you.
- To obtain a copy of your personal information processed by us, in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance.
- To opt out from having us disclose your personal information to third parties for targeted advertising purposes. Lincoln Electric uses third-party analytical and targeted advertising features on Digital Properties provided by our marketing partners. To opt out of this sharing of your personal information in these circumstances, please click [here](#) to access the Cookie Settings.
- To opt out of having their personal information used for profiling in furtherance of decisions that produce legal or similarly significant effects.
- To opt-out of the “sale” of your personal information. However, Lincoln Electric does not sell your personal information to third parties for monetary consideration or other valuable consideration, and therefore we do not provide opt-out request processes for the sale of personal information (because we do not undertake such activities).
- To opt out of the use of Automated Decision-Making Technology (“ADMT”) that is used to make significant decisions about you, including decisions that produce legal or similarly significant effects. Lincoln Electric does not currently use ADMT to make decisions concerning you that produce legal or similarly significant effects without meaningful human involvement.

Nevada residents may submit a request directing us to not sell personal information we maintain about them to third parties who will sell or license their personal information to others. If you would like to exercise this right (even though we do not sell or license personal information), please contact us using the contact details provided in Section 12 (*Contact Information*). Where permitted by U.S. state law, you may designate an authorized agent to submit a privacy request on your behalf.

For California residents Lincoln Electric provides an option to opt-out to sharing of “personal information,” as defined by California’s “Shine the Light” law, with third parties (other than with Company affiliates) for such third parties’ own direct marketing purposes. California residents may exercise this opt-out, request information about our Shine the Light law compliance, and/or obtain a disclosure of third parties we have shared information with and the categories of information shared. To do so contact us using the contact details provided in Section 12 (*Contact Information*). You must put the statement “Shine the Light Request” in the body of your

correspondence. In your request, please attest to the fact that you are a California resident and provide a current California address for your response. This right is different than, and in addition to, CCPA rights, and must be requested separately. We are only required to respond to one request per consumer each year. We are not required to respond to requests made by means other than through the email address provided. We will not accept Shine the Light requests by telephone or by fax, and are not responsible for requests not labeled or sent properly, or that are incomplete.

Privacy Request Verification Process. If you make any request related to your personal information, Lincoln Electric will ascertain your identity (and the identity of the authorized agent, to the extent applicable) to the degree of certainty required or permitted under the law before addressing your request. In particular, before granting you access to, erasing, or correcting, specific pieces or categories of personal information or otherwise responding to your request, Lincoln Electric will, to the extent required or permitted by law, (i) require you (or your authorized agent) to verify your request via email, (ii) request certain contact information or government identifiers, and (iii) match at least two pieces of such personal information with data that we have previously collected from you. None of your privacy rights are absolute, and such rights are subject to exceptions and exemptions.

Privacy Requests Appeals Process. If you would like to appeal a decision Lincoln Electric has made with respect to your privacy request, please email us using the contact details provided in Section 12 (*Contact Information*), with the subject line “ATTN: Privacy Appeals,” and describe the nature of your request, and the reason for requesting an appellate review.

Complaints. You may file a complaint about our data processing activities with your local authorities, which may include, without limitation, the following:

[The Colorado Attorney General](#)

[The Connecticut Attorney General](#)

[The Delaware Attorney General](#)

[The Iowa Attorney General](#)

[The Maryland Attorney General](#)

[The Montana Attorney General](#)

[The Nebraska Attorney General](#)

[The Nevada Attorney General](#)

[The New Hampshire Attorney General](#)

[The New Jersey Division of Consumer Affairs](#)

[The Oklahoma Attorney General](#)

[The Oregon Attorney General](#)

[The Tennessee Attorney General](#)

[The Texas Attorney General](#)

14. Supplemental Information for the EEA, Switzerland, and the UK

The following terms supplement the above disclosures with respect to our processing of European Economic Area (“EEA”), Swiss, and United Kingdom (“UK”) Personal Data, and only apply to the extent that EEA, Swiss, or UK data protection laws apply to our processing of your Personal Data. To the extent applicable, in the event of any conflict or inconsistency between the other parts of the Privacy Notice and the terms of this Section 13, this Section 13 shall govern and prevail with regards to the processing of such EEA, Swiss, or UK Personal Data.

Data Controller

Unless otherwise specified, the entity responsible for the processing of your Personal Data as the controller is the entity whose website you are visiting, the entity to which you are submitting your job application or your vulnerability reporting or the entity that concluded the sales/services and accepts payment from you, that markets or provides promotional materials to you.

In some cases, more than one Lincoln Electric group entity may make decisions on how your Personal Data is processed, such as when two Lincoln Electric group entities co-sign a contract with you or multiple Lincoln Electric group entities organize an event. In these situations, all such entities are jointly responsible for the lawfulness of the specific processing activities as joint controllers.

In other cases, different Lincoln Electric group entities may independently determine how your Personal Data is processed as independent controllers, such as when one Lincoln Electric group entity uses Personal Data received from another Lincoln Electric group entity to market to you.

You can identify the Lincoln group entity that may be the controller of your Personal Data using the table below, which includes the full list of Lincoln Electric entities and their contact details. For further details, please do not hesitate to contact us using the contact details in Section 12 (*Contact Information*) above or the **Data Protection and Privacy Coordinator for Europe (see below)**.

Legal Bases for Processing

We process the following categories of Personal Data for the following processing purposes to the extent necessary to achieve the purpose of processing based on the following legal bases:

<i>Processing purposes</i>	<i>Categories of Personal Data</i>	<i>Legal bases</i>
To provide you or your company with products, services, and information related thereto (Section 3.A)	• Identifiers (Section 2.A) • Records about you (Section 2.B) • Commercial information (Section 2.D) • Internet or other electronic network activity information (Section 2.E) • Non-precise geolocation data (Section 2.F) • Audio, electronic, visual, or other sensory information (Section 2.G) • Professional or employment-related information (Section 2.H) • Education information (Section 2.I) • Interferences (Section 2.J) • Sensitive data (Section 2.K)	• Performance of a contract to which you are a party or to take steps at your request prior to entering into a contract. • Legitimate interests as set out in the <i>How We Use Personal Data</i> section above. • Your consent, when appropriate.
Contact Us, Ask the Experts, and other Interactions (Section 3.B)	• Identifiers (Section 2.A) • Records about you (Section 2.B) • Commercial information (Section 2.D) • Non-precise geolocation data (Section 2.F) • Audio, electronic, visual, or other sensory information (Section 2.G) • Inferences (Section 2.J)	• Performance of a contract to which you are a party or to take steps at your request prior to entering into a contract. • Legitimate interests as set out in the <i>How We Use Personal Data</i> section above.
For our internal business purposes (Section 3.C)	• All categories listed in Section 2.	• Compliance with a legal or statutory obligation to which we are subject. • Legitimate interests as set out in the <i>How We Use Personal Data</i> section above.

For our internal research and product improvement purposes (Section 3.D)	• Identifiers (Section 2.A) • Records about you (Section 2.B) • Commercial information (Section 2.D) • Internet or other electronic network activity information (Section 2.E) • Non-precise geolocation data (Section 2.F) • Audio, electronic, visual, or other sensory information (Section 2.G) • Professional or employment-related information (Section 2.H) • Education information (Section 2.I) • Inferences (Section 2.J)	• Legitimate interests as set out in the <i>How We Use Personal Data</i> section above. • Your consent, when appropriate.
Questionnaires and Survey (Section 3.E)	• Identifiers (Section 2.A) • Records about you (Section 2.B) • Commercial information (Section 2.D) • Internet or other electronic network activity information (Section 2.E) • Non-precise geolocation data (Section 2.F) • Audio, electronic, visual, or other sensory information (Section 2.G) • Professional or employment-related information (Section 2.H) • Education information (Section 2.I) • Inferences (Section 2.J)	• Legitimate interests as set out in the <i>How We Use Personal Data</i> section above. • Your consent, when appropriate.
For legal, safety, or security reasons (Section 3.F)	• All categories listed in Section 2.	• Compliance with a legal or statutory obligation to which we are subject. • Legitimate interests as set out in the <i>How We Use Personal Data</i> section above. • Protection of vital interests.

Corporate Transactions (Section 3.G)	• Identifiers (Section 2.A) • Records about you (Section 2.B) • Commercial information (Section 2.D) • Non-precise geolocation data (Section 2.F) • Audio, electronic, visual, or other sensory information (Section 2.G) • Professional or employment-related information (Section 2.H) • Sensitive data (Section 2.K)	• Legitimate interests as set out in the <i>How We Use Personal Data</i> section above.
For marketing and targeted advertising (Section 3.H)	• Identifiers (Section 2.A) • Records about you (Section 2.B) • Commercial information (Section 2.D) • Internet or other electronic network activity information (Section 2.E) • Non-precise geolocation data (Section 2.F) • Audio, electronic, visual, or other sensory information (Section 2.G) • Professional or employment-related information (Section 2.H) • Education information (Section 2.I) • Inferences (Section 2.J)	• Legitimate interests as set out in the <i>How We Use Personal Data</i> section above. • Your consent, when appropriate.
To manage myLincoln Account (Section 3.I)	• Identifiers (Section 2.A) • Records about you (Section 2.B) • Commercial information (Section 2.D) • Internet or other electronic network activity information (Section 2.E) • Non-precise geolocation data (Section 2.F) • Professional or employment-related information (Section 2.H) • Sensitive data (Section 2.K)	• Legitimate interests as set out in the <i>How We Use Personal Data</i> section above. • Your consent, when appropriate.

Operate Mobile Applications and Internet Connected Devices (Section 3.J)	• Identifiers (Section 2.A) • Records about you (Section 2.B) • Demographic information (Section 2.C) • Commercial information (Section 2.D) • Internet or other electronic network activity information (Section 2.E) • Non-precise geolocation data (Section 2.F) • Professional or employment-related information (Section 2.H) • Inferences (Section 2.J)	• Performance of a contract to which you are a party or to take steps at your request prior to entering into a contract. • Legitimate interests as set out in the <i>How We Use Personal Data</i> section above. • Your consent, when appropriate.
To facilitate and manage video teleconferencing for training, meetings, and corporate events (Section 3.K)	• Identifiers (Section 2.A) • Demographic information (Section 2.C) • Audio, electronic, visual, or other sensory information (Section 2.G) • Professional or employment-related information (Section 2.H)	• Performance of a contract to which you are a party or to take steps at your request prior to entering into a contract. • Legitimate interests as set out in the <i>How We Use Personal Data</i> section above. • Your consent, when appropriate.
Locating a Distributor (Section 3.L)	• Non-precise geolocation data (Section 2.F) • Inferences (Section 2.J)	• Legitimate interests as set out in the <i>How We Use Personal Data</i> section above. • Your consent, when appropriate.
Customer and Investor Updates (Section 3.M)	• Identifiers (Section 2.A) • Commercial information (Section 2.D) • Professional or employment-related information (Section 2.H)	• Performance of a contract to which you are a party or to take steps at your request prior to entering into a contract. • Legitimate interests as set out in the <i>How We Use Personal Data</i> section above. • Your consent, when appropriate.
For recognition purposes (Section 3.N)	• Identifiers (Section 2.A) • Demographic information (Section 2.C) • Audio, electronic, visual, or other sensory information (Section 2.G)	• Legitimate interests as set out in the <i>How We Use Personal Data</i> section above. • Your consent, when appropriate.

	• Professional or employment-related information (Section 2.H)	
To maintain the safety and security of our premises (Section 3.O)	• Identifiers (Section 2A) • Records about you (Section 2.B) • Audio, Electronic, and Visual Information (Section 2.G)	• Legitimate interests as set out in the <i>How We Use Personal Data</i> section above. • Protection of vital interests.
Recruitment (Section 3.P and Section 9)	• Identifiers (Section 2.A) • Records about you (Section 2.B) • Demographic information (Section 2.C) • Audio, electronic, visual, or other sensory information (Section 2.G) • Professional or employment-related information (Section 2.H) • Inferences (Section 2.J) • Applicant data (Section 2.K and Section 9)	• Your consent, when appropriate. • Our Legitimate interests in carrying out appropriate assessment of applications and selecting suitable candidates for available roles. • To take steps at your request prior to entering into a contract. • Compliance with a legal or statutory obligation to which we are subject.
Vulnerability reporting (Section 3.K and Section 10)	• Identifiers (Section 2.A) • Records about you (Section 2.B) • Professional or employment-related information (Section 2.H) • Inferences (Section 2.J) • Vulnerability Reporter data (Section 2.L and Section 10)	• Your consent, when appropriate for public credit of the Reporter. • Our Legitimate interests in maintaining product security and protecting customers;. • Compliance with a legal or statutory obligation to which we are subject.

Automated decision-making: we do not carry out any solely automated decision-making that produces legal or similarly significant effects on you. CAPTCHA verification is used only to filter automated spam submissions.

Your Data Protection Rights

Under the conditions set by applicable data protection laws, you may exercise certain rights regarding your Personal Data.

- **Right to Access.** You have the right to obtain confirmation from us whether we are processing your Personal Data and related information, as well as the right to obtain a copy of your Personal Data undergoing processing.
- **Right to Data Portability.** You have the right to receive the Personal Data you previously provided to us in a structured, commonly used and machine-readable format.
- **Right to Rectification.** You have the right to request the rectification of inaccurate Personal Data and to have incomplete data completed.
- **Right to Objection.** You have the right to object to the processing of your Personal Data in certain cases.
- **Right to Restrict Processing.** You may request that we restrict the processing of your Personal Data in certain cases.
- **Right to Erasure.** You may request that we erase your Personal Data in certain cases.
- **Right to Lodge a Complaint.** You have the right to lodge a complaint with a supervisory authority in the country where you reside or where the conduct that is the subject of the complaint occurred. You can also lodge a complaint with us using the information in Section 12 (*Contact Information*) if UK laws apply to you and you think we have infringed our UK data protection obligations when handling your Personal Data.
- **Right to Refuse or Withdraw Consent.** In case we ask for your consent to process your Personal Data, you are free to refuse to give it. If you have given us consent, you may withdraw it at any time without any adverse consequences. The lawfulness of any processing of your Personal Data that occurred prior to the withdrawal of your consent will not be affected.

You may exercise these rights by contacting us using the details in [Section 12](#) (*Contact Information*) above.

International Transfers of Personal Data

Due to the global nature of our operations, some of the recipients mentioned in the *To Whom We Disclose Personal Data* Section of this Privacy Notice may be located in countries outside the EEA, Switzerland, or the UK that do not provide an adequate level of data protection as defined by data protection laws in the EEA, Switzerland, and the UK.

International transfers may occur to countries where Lincoln Electric operates, including the United States, United Kingdom, Canada, Mexico, Argentina, Brazil, Colombia, Venezuela, Australia, China, India, and Japan.

Certain third countries have been officially recognized by the EEA, Swiss and the UK authorities as providing an adequate level of protection. Transfers within our corporate group or to third parties located in third countries that have not received such recognition take place using our Global Intra-Group Data Transfer and Processing Agreement, which is based on the Standard Contractual Clauses adopted by the European Commission to protect the Personal Data when transferred outside the EEA, including required UK/Swiss Addendum, and in accordance with applicable law. In exceptional circumstances transfers may take place on the basis of permissible statutory derogations.

Transfers to Third Parties

Some of the third parties with whom we share Personal Data are also located outside the EEA, Switzerland, and the UK. Transfers to third parties located in such third countries take place using an acceptable data transfer mechanism, such as the EU Standard Contractual Clauses (and required UK/Swiss addendums), Binding Corporate Rules, approved Codes of Conduct and Certifications or in exceptional circumstances on the basis of permissible statutory derogations.

Please contact us at privacy@lincolnelectric.com, if you want to receive further information or, where available, a copy of the relevant data transfer mechanism.

Data Protection and Privacy Coordinator for Europe

If you have questions, concerns, or complaints about this Privacy Notice or our privacy practices, please contact the Data Protection and Privacy Coordinator for Europe:

privacy@lincolnelectric.com

15. Supplemental Country-Specific Information

Residents of certain countries can find more information on our privacy practices below. Each country-specific terms supplement the above disclosures with respect to our processing of Personal Data of residents of that country and only apply to the extent that data protection laws of that country apply to our processing of your Personal Data. To the extent applicable, in the event of any conflict or inconsistency between the other parts of the Privacy Notice and the applicable terms of this Section 15 shall govern.

COUNTRY SELECTION

Canada

Application

The following terms amend or supplement this Privacy Notice (the “Notice”) only with respect to Lincoln Electric’s collection, use, disclosure, or other processing (“Processing”) of Personal Data of Business Contacts located in Canada (“Canadian Personal Data”). For the avoidance of doubt, the Notice applies to Canadian Personal Data and describes Lincoln Electric’s Processing of Canadian Personal Data, except as expressly amended below. To the extent applicable, in the event of any conflict or inconsistency between the Notice and the terms below, the terms below shall govern and prevail with regard to the Processing of Canadian Personal Data. For purposes of the Notice, “Personal Data” includes all “personal information” as defined under the Personal Information Protection and Electronic Documents Act and any applicable substantially similar provincial legislation.

Consent

Notwithstanding anything to the contrary in this Notice, Lincoln Electric will rely on your consent, express or implied in accordance with applicable law, as the basis for Processing your Canadian Personal Data, except where otherwise required or permitted by applicable law. Where we collect Sensitive data described in Section 2.K above, including information relating to credit history or criminal convictions and offences, we will obtain your express consent to do so, except as otherwise permitted or required by applicable law. If we materially change our privacy policies or practices (including this Notice) in a way that affects how we Process your Canadian Personal Data, we will notify you and obtain consent to such changes, where required by applicable law.

Commercial Electronic Messages

Where we send you commercial electronic messages, such as newsletters or marketing communications, we do so in accordance with Canada's Anti-Spam Legislation ("CASL"). Where we rely on your express consent, you may withdraw that consent, and where we rely on implied consent, you may opt out, at any time by using the unsubscribe mechanism included in the message or by contacting us using the details in [Section 12](#) (Contact Information) above.

How We Share Your Personal Data

We share Canadian Personal Data with our affiliates and third-party service providers for the purposes described in [Section 4](#) (To Whom We Disclose Personal Data) above, including for marketing and advertising, recruitment support, completion of online transactions, business operations, data analytics, website administration, compliance with legal obligations, and corporate transactions. These affiliates and third parties may Process Canadian Personal Data in countries including the United States, Ireland, Singapore, and Germany. Lincoln Electric entities that may collect, use, or have access to Canadian Personal Data include the Lincoln Electric Company of Canada LP and its affiliated entities within the Lincoln Electric group. Further information regarding our service providers and affiliates may be obtained by contacting us as described in Section 12 (Contact Information) above.

Cookies and Other Tracking Technologies

As described in [Section 5](#) (Cookies and Other Tracking Technologies) above and our Cookie Policy, Lincoln Electric uses first-party and third-party cookies and other tracking technologies on our Digital Properties. Unless otherwise required by applicable law, you can prohibit Lincoln Electric from using non-essential cookies and online tracking, including those used for targeted advertising. Where required by applicable law, including the law of the Province of Quebec, such technologies will be off by default unless and until you provide your consent to their use.

How We Protect Your Personal Data

Lincoln Electric implements appropriate physical, technological, administrative, and organizational security safeguards designed to protect Canadian Personal Data against loss, theft, unauthorized access, disclosure, copying, use, or modification, as further described in [Section 6](#) (Data Security, International Sharing and Data Retention) above.

Risks and Consequences

Despite our reasonable efforts, no security measure is ever perfect or impenetrable, and we cannot guarantee the security of your Canadian Personal Data. Although Lincoln Electric takes steps to protect Canadian Personal Data Processed on its behalf by third parties, to the extent required by applicable law, it is possible that such third parties may not adequately protect your Personal Data, and we cannot provide a definitive guarantee of the security of Personal Data Processed by third parties.

International Transfers of Personal Data

Canadian Personal Data may be stored, Processed, or otherwise transferred outside of Canada, including to the United States and other countries described in [Section 6](#) (Data Security, International Sharing and Data Retention) above. Personal Data transferred, stored, or otherwise Processed outside your jurisdiction of residence is subject to the laws of that foreign jurisdiction, and may be accessible to that jurisdiction's government, courts, or law enforcement or regulatory authorities pursuant to a lawful order or in accordance with the laws of that foreign jurisdiction. Without limiting the foregoing, we will take reasonable steps to ensure that Canadian Personal Data regarding Quebec residents that is Processed outside Quebec, or entrusted to a person outside Quebec, will not be used for any purpose other than the purpose for which it was collected (or other purposes permitted or required by applicable law), or disclosed to third parties, without the consent of the relevant individual.

Data Retention

We retain Canadian Personal Data for only as long as necessary for the purposes for which it was collected, or as required to comply with applicable legal requirements. Once the purposes for which Canadian Personal Data was collected have been achieved, we will, subject to any preservation period required by applicable law, either destroy the Personal Data or, where permitted by applicable law, anonymize it.

Your Rights

Your rights in relation to your Canadian Personal Data may vary depending on the province in which you are located and your relationship with Lincoln Electric. Such rights may include the right to: request deletion of Personal Data that was not collected in accordance with applicable law; access, correct, rectify, or update your Personal Data; be informed of the existence, use, and disclosure of your Personal Data, and to challenge the accuracy and completeness of such information and have it amended as appropriate; withdraw consent to the continued collection, use, or disclosure of your Personal Data; require that Lincoln Electric cease disseminating your Personal Data or de-index any hyperlink providing access to such information by technological means, where the dissemination contravenes the law or a court order and other applicable conditions are met; and raise a concern regarding compliance with applicable privacy laws with the individual(s) designated as accountable for Lincoln Electric's compliance with such laws, as identified below.

Consequences of Consent Withdrawal

If you withdraw your consent to the collection, use, or disclosure of your Canadian Personal Data, Lincoln Electric will respect your decision. However, please be aware that if you withdraw your consent, you may not have access to all (or any) of the products, services, or functionality of our Digital Properties, and we might not be able to provide you with all (or any) of the products or services you have requested. We will inform you of the implications of withdrawing your consent at the time of your request. The withdrawal of your consent will not affect the lawfulness of any Processing carried out prior to your withdrawal.

Contacting Us

If you are located in Canada and would like to exercise the rights described above, or if you have questions or concerns about this Notice or Lincoln Electric's collection, use, disclosure, or other Processing of your Canadian Personal Data, including Processing carried out by our service providers and affiliates located outside of Canada, please contact us using the details provided in Section 12 (Contact Information) above. You may also contact Lincoln Electric Canada's Data Privacy Officer, currently Michael Lennane, Labor & Employment Counsel at privacy@LincolnElectric.com. You also have the right to lodge a complaint with the Office of the Privacy Commissioner of Canada (www.priv.gc.ca) or, if you are located in the Province of Quebec, Alberta or British Columbia, the Commission d'accès à l'information du Québec (www.cai.gouv.qc.ca), the Alberta Information and Privacy Commissioner (<https://oipc.ab.ca/>), and the British Columbia Information and Privacy Commissioner (<https://www.oipc.bc.ca/>), respectively.