



Countries: Global	<b>STUDENT PRIVACY NOTICE AND POLICY</b>	Effective Date: March 1, 2021
		Last Updated: August 1, 2024

This Student Privacy Notice and Policy (hereinafter, “**Student Notice**”) describes the policy on, and procedures related to, the collection, use, and disclosure of Personal Information that is provided to the Lincoln Electric Welding School directly or during any other professional training or educational class operated or funded by the Lincoln Electric Company or its divisions, affiliates, and subsidiaries. In addition, this Student Notice addresses the collection, use, and disclosure of Student Records (including the Personal Information contained therein) by the Lincoln Electric Welding School and the rights and responsibilities you may have with respect to such Student Records and Personal Information.

THE LINCOLN ELECTRIC WELDING SCHOOL AND ITS ONLINE SERVICES ARE NOT DIRECTED TO ANYONE UNDER THE AGE OF FIFTEEN (15). IF YOU ARE UNDER THE AGE OF FIFTEEN (15) PLEASE DO NOT USE OUR SERVICES WITHOUT THE DIRECT AND EXPRESS CONSENT OF YOUR PARENT OR LEGAL GUARDIAN.

**1. Definitions**

For purposes of this Student Notice, the following definitions shall apply:

The term “Controller” refers to the natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Information.

The term “Data Protection Law” refers to any data protection law, statute, and regulation applicable to the Lincoln Electric Welding School in the context of its collection, processing, retention, dissemination, disclosure, transfer, disposal, or use of Personal Information.

The term “Personal Information” refers to any information, or a combination of pieces of information, that can directly or indirectly identify an individual, household, or device, and that is subject to, or otherwise afforded protection under, an applicable Data Protection Law. Personal Information includes (but is not limited to) such personally identifiable information set forth in a Student Record.

The term “Student Record” refers to all academic records, applications, documents, and similar materials, in whatever format and medium, related to an individual’s registration to, participation in, or other contact with, the Lincoln Electric Welding School.

**2. Scope**

This Student Notice applies to (i) current and former students of the Lincoln Electric Welding School, (ii) individuals who have registered or otherwise provided information to the Lincoln Electric Welding School, regardless of whether they have attended any education, learning, or training events, and (iii) individuals who otherwise provide information, either directly or indirectly, to the Lincoln Electric Welding School as part of their, or their employer’s, participation in a program administered, facilitated, or funded by the Lincoln Electric Welding School (program participants and sponsors). In addition, this Student Notice applies to all information and data provided to any website or online service operated by, or under the control of, the Lincoln Electric



Welding School or a third party acting on our behalf (collectively, the “Welding School Websites”). In the event that an individual accesses any other website or online service operated by the Lincoln Electric Company or any other affiliated company, then the privacy policy applicable to such other website or online service (and not this Student Notice) shall apply to Personal Information collected therefrom or processed thereon.

### **3. Identification of Data Controllers Under Data Protection Law**

This section applies only to the extent required under local Data Protection Law, such as that in the EU, UK, or other applicable jurisdictions.

For purposes of this Student Notice, the entity with which you have a primary educational relationship (such as the entity providing, operating, or facilitating the professional training or educational classes, or an entity whose representatives you have interacted with via educational platforms or video teleconferencing) will act as the Controller of your Personal Information. In addition, The Lincoln Electric Company, located at 22801 St. Clair Avenue, Cleveland, Ohio 44117-1199, USA, will serve as a joint Controller of the Personal Information collected, used, disclosed, or otherwise processed by the Lincoln Electric Welding School (including as contained in Student Records). If you have questions about who the Controller of your Personal Information is, please contact the Data Protection and Privacy Coordinator as specified in Section 15 of this Student Notice.

### **4. Programs Funded or Sponsored by Public Authorities**

The Lincoln Electric Welding School may administer programs and curriculum that are sponsored or funded by public authorities. In the event you participate in any such program or scholarship sponsored or funded by public authorities, you hereby acknowledge that your Personal Information will be collected, used, and otherwise processed in accordance with the applicable rules, regulations, and requirements related to this Student Notice and to the program or scholarship sponsored or funded by public authorities.

### **5. Collection of Personal Information; Data Sources**

The Lincoln Electric Welding School collects a broad range of Personal Information about its students, applicants, program participants and sponsors. We may collect this Personal Information directly from the student (e.g., registration forms, school participation) or from a third party (e.g. student’s employer, instructors, vocational training schools, background-check service providers, distributors of our services).

Depending on (i) the applicable law of the country in which you reside and/or (ii) the specific program in which you participate, we may collect the following categories and types of Personal Information as part of our routine business and our curriculum and programs. Note that some of the Personal Information set forth below is only collected as part of a specific program we are providing (e.g., a program sponsored or funded by a public authority).

Note that if we process your Personal Information for the purposes of compliance with legal or contractual obligations, or for entering into any contract with you, you have to provide us with certain Personal Information when requested. Otherwise, we may not be able to perform the contract which we have entered into with you, or we may be prevented from complying with our legal obligations, as the case may be. In such event, we may decline to enter into any contract with you or cancel any services related to you, whether in whole or in part.



Personal Information Category	Personal Information Description
<b>Identity and Contact Data</b>	Names (first, last), date of birth, nationality, gender, residential address, telephone number, email address, social security number, driver's license number, passport number, online identifier, internet protocol address, account information (including student's registration with the Lincoln Electric Welding School) or other similar identifiers.
<b>Sensitive Data (when permitted under law)</b>	Ethnicity, race, veteran or military status, disability status, union status and collective bargaining agency.
<b>Online Data</b>	Information related to a usage of Lincoln Electric Welding School equipment; information technology, computers, assets, and resources; and Welding School Websites, including registration data (e.g., username and passwords), online browsing history, search history, and information regarding your interaction with the Welding School Websites or its online applications or advertisements.
<b>Professional Data</b>	Employment status, name of employer, employer address, employer contacts, occupation, professional title, salary and wage-related data, occupation code (O*NET Code), dates of apprenticeship, previous employers, and weeks worked in twelve-month period prior to becoming a registered apprentice.
<b>Student Record</b>	Any information or data that relates to a student's registration to, participation or performance in, or other contact with, the Lincoln Electric Welding School, including grades and transcripts, registration, status, attendance, participation and performance, training certifications, disciplinary records, and class credits.
<b>Education Data</b>	Educational institutions attended, level of education completed, and dates attended and completed.
<b>Apprenticeship Data</b>	Apprentice identification number, expected completion date, and sponsor-related information.
<b>Financial Data</b>	Information related to payment charges and financial obligations to the Lincoln Electric Welding School for our programs or services.
<b>Equipment Data</b>	Information related to how a student controls, operates, or otherwise uses equipment owned, rented, or leased by the Lincoln Electric Welding School, which may include data needed for equipment safety and security purposes (e.g., height, weight).

## 6. Use of Personal Information and Legal Basis for Processing

The Lincoln Electric Welding School uses the following categories of Personal Information (or certain data elements/fields within each of these categories) for a variety of purposes related to the administration, functionality, and marketing of our educational programs and resources, as well as other legitimate business activities, on the basis of the following legal bases in accordance with the applicable Data Protection Laws:



Processing Purposes	Categories of Personal Information Processed	Legal Basis for Processing
Generate Student Records related to participation	Identity and Contact Data, Student Record, Education Data, Apprenticeship Data	Performance of a contract; Necessary for our legitimate interests
Create, improve, or provide educational content	Online Data, Student Record, Education Data	Performance of a contract; Necessary for our legitimate interests
Conduct statistical analyses on student performance	Student Record, Education Data, Online Data	Necessary for our legitimate interests
Provide information about new products, services, newsletters	Identity and Contact Data	Consent (if/when required by law); Necessary for our legitimate interests
Allow purchase and download of products, access educational programs	Identity and Contact Data, Financial Data	Performance of a contract
Provide technical support or assistance	Identity and Contact Data, Online Data	Performance of a contract; Necessary for our legitimate interests
Disseminate transaction-related communications	Identity and Contact Data, Financial Data	Performance of a contract
Promote and market our business opportunities	Identity and Contact Data, Professional Data	Consent; Necessary for our legitimate interests
Send surveys or marketing communications	Identity and Contact Data	Consent; Necessary for our legitimate interests
Comply with legal, regulatory, and contractual obligations	Identity and Contact Data, Sensitive Data, Professional Data, Financial Data, Equipment Data	Consent; Compliance with a legal obligation; Necessary for the establishment, exercise, or defense of legal claims

## 7. Disclosure of Personal Information

The Lincoln Electric Welding School retains Personal Information in a confidential manner and does not sell, lease, or rent Personal Information to any other party for profit. We do not share Student Records with a student’s parent or legal guardian without the express consent of the student or unless required by applicable law or contract. Notwithstanding the foregoing, the Lincoln Electric Welding School may disclose any of the abovementioned identified Personal Information in the following circumstances:

- To any individual or entity when such disclosure is based upon your written consent on our *Authorization for Release of Student Information Form*.
- To administrators and instructors, including teachers and teaching assistants, or other employees at the Lincoln Electric Welding School or the Lincoln Electric Company division, affiliate, or subsidiary to inform them about the completion of our academic program courses.
- To federal, state, or local government agencies or officers, including for legal and regulatory compliance related to the execution of programs sponsored or funded by public authorities.
- To accrediting agencies carrying out their administrative and educational functions.
- To employers or similar professional sponsors of the student applying for, participating in, a program.



- To other employees within the same employer organization, provided such disclosure is consistent with the purpose and structure for how the specific Lincoln Electric Welding School program has been procured by the employer.
- In response to a judicial order, lawfully issued subpoena, or similar regulatory or administrative request.
- To security officers or to law enforcement agencies in the investigation of a specific criminal case.
- To the appropriate person in connection with an emergency, if the knowledge of such information is necessary to protect the health or safety of the student or other persons.
- To federal or state-funded educational agencies and institutions that request records when a student seeks to enroll or is already enrolled.
- To service providers who perform on our behalf (e.g., learning management system providers, payment processors, website administrators, data storage and marketing service providers).
- To third parties in connection with a corporate reorganization, merger or acquisition, or the sale of all, or substantially all, of the Lincoln Electric Welding School or the Lincoln Electric Company's assets.

## **8. Retention Policy and Data Transfers**

The Lincoln Electric Welding School maintains Student Records (and the Personal Information therein) only as long as required to comply with the purposes for which the Personal Information was collected, unless otherwise required by law or regulation or to defend or protect our legal or business interests during the applicable statute-of-limitation period.

The Lincoln Electric Welding School is located in the United States, and the data (including Personal Information) that we collect and process is often transferred to the United States. In some circumstances, the Lincoln Electric Welding School uses third-party service providers that retain information and data on our behalf in the United States and in other third countries. Please be aware that information you provide to the Lincoln Electric Welding School may be transferred to the United States or another third country, and that the United States and such other third countries may not provide the same level of data protection as the laws in your country.

When transferring your personal data to a country or territory other than the one you reside in, we will adopt any necessary data transfer safeguards and/or mechanisms in accordance with the applicable Data Protection Law to ensure that your Personal Information is protected.

## **9. Accessing and Transferring Student Records**

Students may request access to their Student Records generated at the Lincoln Electric Welding School by completing the *Request for Learner Records Form* and submitting it to the Lincoln Electric Welding School. Students may request that their records be sent to a third party by completing the *Authorization for Release of Student Information Form* and submitting it to the Lincoln Electric Welding School. To protect your confidentiality, we cannot accept requests made over the phone. One form of government-issued photo identification is required in case we have doubts about your identity.

The *Request for Learner Records Form* can be emailed to [weldtraining@lincolnelectric.com](mailto:weldtraining@lincolnelectric.com) (please attach the completed Form to the email as a PDF) or mailed to The Lincoln Welding School, 22800 Saint Clair Ave., Cleveland, Ohio 44117. Student Record access forms can be found at <https://education.lincolnelectric.com>.



In-Person: In the event you are in the United States, you may submit an “in-person” request for access to Student Records at the Lincoln Electric Welding School’s office (22800 Saint Clair Ave., Cleveland, Ohio 44117) between 8:00 a.m. and 4:00 p.m. (EST), Monday through Friday, except for federal holidays.

## 10. Your Rights and Responsibilities

You are permitted, and hereby agree, to only provide Personal Information to the Lincoln Electric Welding School if such Personal Information is accurate, reliable, and relevant to our relationship and only to the extent such disclosure will not violate any applicable data protection law, statute, or regulation or infringe upon any individual’s data privacy rights or privileges. If you provide the Lincoln Electric Welding School with any Personal Information about a third party, you expressly represent that you have the full right and authority to provide the Personal Information to the Lincoln Electric Welding School and will fully reimburse the Lincoln Electric Welding School for any expenses incurred, or damages or liabilities arising, from breaches of any of the terms or conditions set forth in this Student Notice.

Depending on the jurisdiction in which you reside, or we operate, you may have certain data protection rights under local Data Protection Laws. We will honor data protection rights only if you have such rights under local Data Protection Law. These rights are subject to the conditions set out in those laws and may include:

- **Right to Information:** You have the right to be informed about the collection and use of your Personal Information. This includes understanding what data is being collected, how it is being used, and why it is necessary for those purposes.
- **Right of Access:** You may request access to your Personal Information, allowing you to receive a copy of the Personal Information we hold about you and verify that we are lawfully processing it.
- **Right to Rectification:** If any Personal Information we hold about you is inaccurate or incomplete, you have the right to have it corrected or completed.
- **Right to Erasure (Right to be Forgotten):** Under certain circumstances, you can request the deletion or removal of Personal Information where there is no compelling reason for its continued processing.
- **Right to Restrict Processing:** You have rights to 'block' or suppress further use of your data. When processing is restricted, we can still store your data but not use it further.
- **Right to Object:** You have the right to object to the processing of your Personal Information in certain circumstances, including for direct marketing purposes.
- **Right to Data Portability:** This right allows you to receive your Personal Information in a structured, commonly used, and machine-readable format, and to transmit those data to another data Controller.
- **Right to Not Be Subject to Automated Decision-making.** You have the right to not to be subject to a decision based solely on automated processing and to be given more information about why any such decision was made.
- **Right to Refuse or Withdraw Consent.** In case we ask for your consent to process your Personal Information, you are free to refuse to give it. If you have given your consent, you may withdraw it at any time without any adverse consequences. The lawfulness of any processing of your Personal Information that occurred prior to the withdrawal of your consent will not be affected.
- **Exercise Your Rights:** You can exercise any of the above rights and ask questions about the processing of your Personal Information by contacting us (see Section 15).
- **Right to Make a Complaint:** If you are unhappy with how we are handling your Personal Information, you have the right to make a complaint to your local data protection authority, which will investigate the matter.

Schedule 1 of the Student Notice provides you with further information on the data protection rights that you may be entitled with pursuant to the local Data Protection Laws of the countries where we usually operate.





To exercise any of these data privacy rights outlined above and in Schedule 1, please contact us, or have your authorized agent or representative contact us, in accordance with the instructions below or through the “Contact Us” section listed at the end of this Student Notice. If we have reasonable doubts concerning your identity, we may request you to provide us with a copy of an official ID or passport to verify your identity before responding to your data right request. If you exercise any of these data privacy rights through an authorized agent or representative, please note that we may require further documentation (i.e. authorization or power of attorney) to ensure that they have the authority to act on your behalf.

We will respond to any data requests within the timeframes required by applicable Data Protection Law, and we may charge a fee to facilitate your request where permitted by applicable Data Protection Law. The rights afforded under applicable Data Protection Laws are not always absolute, and the Lincoln Electric Welding School may be permitted under the applicable Data Protection Law to refrain from undertaking any action or changing its data processing activities, in response to a data request you submit to us.

### **11. Persons with Disabilities**

The Lincoln Electric Welding School strives to ensure that every person has access to information related to our products and services, including this Privacy Notice. Please contact us if you would like this Privacy Notice provided in an alternative format, and we will seek to meet your needs.

### **12. Data Security**

Keeping Personal Information confidential and secure is of utmost importance to the Lincoln Electric Welding School. We follow standard industry practices to actively protect the confidentiality, security, and integrity of your Personal Information. For example, our employees are bound by internal confidentiality policies and are subject to disciplinary action for any policy violations. We also work to ensure that our third-party service providers are contractually bound to maintain the privacy of any Personal Information shared with them. However, no information system can be fully secure, so we cannot guarantee the absolute security of your Personal Information. Moreover, we are not responsible for the security of information you transmit to the Welding School Websites over networks that we do not control, including the Internet and wireless networks, and you provide us with any information and data at your own risk. To the extent permitted by law, the Lincoln Electric Welding School and the Lincoln Electric Company shall not be liable or otherwise responsible for any data incidents that compromise the confidentiality, integrity, or security of your Personal Information that are caused by a third party. You agree that in the event we are legally required to notify you of a security event regarding the confidentiality, integrity, or availability of your Personal Information, we may provide you such notice via email. The safety and security of your Personal Information also depends on you. Where we have given you (or where you have chosen) a username and password to access our websites or online services, you are responsible for maintaining the security and confidentiality of those credentials, and you must contact us immediately if you have to reason to believe they are compromised.

### **13. Welding School Websites**

The Welding School Websites may also contain third-party advertisements which contain embedded hyperlinks to websites operated by third parties. All third-party advertising is paid for by the relevant third-party advertiser, which you can accept by linking to the third-party advertiser, and is not recommended or endorsed by the Lincoln Electric Welding School. The third-party advertiser is solely responsible for any representations or offers made by it, for the delivery of goods or services, and for its data processing.



#### **14. Updates and Amendments**

The Lincoln Electric Welding School may update this Student Notice from time to time, and we will, when required by law, notify you of such changes or updates. The updated Student Notice will, to the extent technically feasible, be posted on our website, and your continued provision of Personal Information after we post a revised Student Notice signifies your acceptance of the revised Student Notice.

#### **15. Contact Us**

If you have any questions, complaints or concerns with regard to this Student Notice, or would like to exercise a data privacy right or privilege described herein, please contact our Data Protection Officer at the following:

Robert Mayo  
Data Protection and Privacy Coordinator  
25 Boulevard de la Paix | 95800 Cergy | France  
+33.1.34.21.30.21 | Office  
+33.6.46.62.24.99 | Mobile  
[privacy@lincolnelectric.com](mailto:privacy@lincolnelectric.com)





**Schedule 1: Local Data Protection Law Deviations by Jurisdiction**

The Schedule below outlines deviations under local Data Protection Law of the jurisdictions where we usually operate and launch academic programs.

This Schedule operates and relates to the main body of the Privacy Notice as follows:

1. This Schedule applies only to the extent required under applicable local Data Protection Law.
2. In case of a conflict between this Schedule and the main body of the Privacy Notice, this Schedule takes precedence.
3. If no local deviations are mentioned below, the main body of the Privacy Notice controls.

<b>Country</b>	<b>Local Data Protection Law Deviations</b>
<p><b>European Economic Area, the United Kingdom, and Switzerland</b></p>	<p>This section applies only to Personal Information, which is subject to European Economic Area (“EEA”), United Kingdom (“UK”), or Swiss (“CH”) data protection laws. It supplements the remainder of this Student Notice.</p> <p><b>8. <u>Retention Policy and Data Transfers</u></b></p> <p>The Lincoln Electric Welding School maintains Student Records (and the Personal Information therein) only as long as required to comply with the purposes for which the Personal Information was collected, unless otherwise required by law or regulation or to defend or protect our legal or business interests during the applicable statute-of-limitation period.</p> <p>The Lincoln Electric Welding School is located in the United States, and the data (including Personal Information) that we collect and process is often transferred to the United States. In some circumstances, the Lincoln Electric Welding School uses third-party service providers that retain information and data on our behalf in the United States and in other third countries. Please be aware that information you provide to the Lincoln Electric Welding School may be transferred to the United States or another third country, and that the United States and such other third countries may not provide the same level of data protection as the laws in your country.</p> <p>When transferring your Personal Information to a country or territory other than the one you reside in, we will adopt any necessary data transfer safeguards and/or mechanisms in accordance with the applicable Data Protection Law to ensure that your Personal Information is protected.</p> <p>In the context of transfers of Personal Information to entities of the Lincoln Electric Group established in the U.S. or third countries that may not offer the same degree of protection for Personal Information as the EEA/UK/CH, the entities of the Lincoln Electric Group have signed an intragroup agreement, which incorporates EU standard contractual clauses (“SCCs”) and the UK Addendum. When transferring Personal Information to third parties established in the U.S. or third countries that may not offer the same degree of protection for Personal Information as the EEA/UK/CH, we adopt any necessary data transfer safeguards and/or mechanisms, which may include EU SCCs and the UK Addendum or the UK International Data Transfer Agreement, Binding Corporate Rules, approved Codes of Conduct and Certifications, or permissible</p>



	<p>statutory derogations, to ensure the protection of your Personal Information.</p> <p>For more information or to request a copy of the relevant transfer mechanism, please contact us (see Section 15).</p>
<b>Indonesia</b>	<p>a. The parties acknowledge and agree that the last two sentences under the Disclaimer section of this Student Notice is replaced by the following provision: <i>“THE LINCOLN ELECTRIC WELDING SCHOOL AND ITS ONLINE SERVICES ARE NOT DIRECTED TO ANYONE UNDER THE AGE OF TWENTY-ONE (21) THAT HAS NOT BEEN LEGALLY MARRIED. IF YOU ARE UNDER THE AGE OF TWENTY-ONE (21) THAT HAS NOT BEEN LEGALLY MARRIED PLEASE DO NOT USE OUR SERVICES WITHOUT THE DIRECT AND EXPRESS CONSENT OF YOUR PARENT OR LEGAL GUARDIAN.”</i></p> <p>b. The parties acknowledge and agree that the provision under section 1 <u>“Definitions”</u> of this Student Notice is replaced by the following provision: <i>“The term <u>“Personal Information”</u> refers to any information, or a combination of pieces of information, that can directly or indirectly identify an individual/natural person and that is subject to, or otherwise afforded protection under, an applicable Data Protection Law. Personal Information includes (but is not limited to) such personally identifiable information set forth in a Student Record.”</i></p> <p>c. The parties acknowledge and agree that the second sentence under section 4 <u>“Programs Funded or Sponsored by Public Authorities”</u> of this Student Notice is replaced by the following sentence: <i>“In the event you participate in any such program or scholarship sponsored or funded by public authorities, you hereby acknowledge and give your consent that your Personal Information will be collected, used, and otherwise processed in accordance with the applicable rules, regulations, and requirements related to this Student Notice and to the program or scholarship sponsored or funded by public authorities.”</i></p> <p>d. Pursuant to the Indonesian Data Protection Laws, every Indonesian individual/natural person have certain data privacy rights, including the following:</p> <ul style="list-style-type: none"><li>• Consent Withdrawal: The right to withdraw your consent to the processing of your Personal Information in cases where consent is required by law to process your Personal Information.</li><li>• Right to Know: The right to know about what Personal Information (be it considered as Student Records or not) the Lincoln Electric Welding School collects about you, and our intended use of, and purposes for collecting, your Personal Information. The Personal Information that we collect from you, the purposes for which it is used, the source of such personal information, and the parties to whom we share your personal information.</li><li>• Access and Update: The right to access and opportunity update Personal Information (be it considered as Student Records or not) that we have collected, used, disclosed, or sold about you (unless otherwise stipulated by the provisions of Indonesian Data Protection Laws).</li><li>• Deletion/Erasure: The right to request that we delete/erase your Personal Information under certain circumstances.</li></ul>

	<p>To exercise any of the data privacy rights set forth herein, please contact us in accordance with the “Contact Us” section listed above.</p>
<p><b>Malaysia</b></p>	<p>The Lincoln Electric Welding School collects, stores, uses, and/or processes personal information in accordance with the Personal Data Protection Act 2010 (“PDPA”).</p> <p><b>4. <u>Collection of Personal Information</u></b></p> <p>The Lincoln Electric Welding School collects a broad range of Personal Information about its students, applicants, program participants and sponsors, including individuals who may be under the age of eighteen (18) . We may collect this Personal Information directly from the student or from a third party (e.g. student’s employer, vocational training schools or background-check service providers) only when this is permitted under applicable law.</p> <p><b>5. <u>Legal Basis for Processing</u></b></p> <p>In this section, we list the legal bases we rely on for the processing of Personal Information as applicable under the PDPA. We rely on the following legal grounds for the collection, processing, and use of your Personal Information:</p> <ul style="list-style-type: none"> <li>• The processing is based on your consent;</li> <li>• The processing is necessary for the performance of a contract to which you are a party or for undertaking measures at your request in preparation for executing such a contract;</li> <li>• The processing is necessary for compliance with a legal or statutory obligation to which we are subject;</li> <li>• The processing is necessary for the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.</li> </ul> <p><b>9. <u>Your Rights and Responsibilities</u></b></p> <p>Under the PDPA, you have the following rights in respect of your Personal Information which is held by us, subject to these rights being exercised in accordance with the PDPA:</p> <ul style="list-style-type: none"> <li>• right to access and correct your Personal Information ;</li> <li>• right to withdraw your consent to the processing of your Personal Information;</li> <li>• right to prevent processing of Personal Information likely to cause damage; or distress; and</li> <li>• right to prevent processing for purposes of direct marketing.</li> </ul> <p>For more information about your rights, please visit this website here:  <a href="https://www.pdp.gov.my/jpdpv2/?lang=en">https://www.pdp.gov.my/jpdpv2/?lang=en</a></p> <p>It is necessary for you to provide the Personal Information requested by us under this Student Notice, in order for us to process your personal data for any of the abovementioned purposes. Should you fail to provide the Personal Information required</p>

	<p>or withdraw your consent to the processing of such Personal Information, we may not be able to provide you the information, products or services as mentioned above or for any of the abovementioned purposes, if at all.</p> <p><b>15. <u>Language</u></b></p> <p>In accordance with the PDPA, this Student Notice is issued in both English and Bahasa Malaysia. In the event of any inconsistencies or discrepancies between the English version and the Bahasa Malaysia version, the English version shall prevail.</p>
<p><b>Philippines</b></p>	<p>Republic Act No. 10173 or the Data Privacy Act of 2012, its implementing rules and regulations, and issuances of the National Privacy Commission (“PDPL”), governs the processing of personal data.</p> <p>The data subject shall have the following rights in terms of processing his/her personal data:</p> <ul style="list-style-type: none"> <li>• Right to be informed: The data subject has the right to be informed whether personal data pertaining to him or her shall be, are being, or have been processed, including the existence of automated decision-making and profiling</li> <li>• Right to Object: The data subject shall have the right to object to the processing of his or her personal data where such processing is based on consent or legitimate interest.</li> <li>• Right to Access: The right of data subjects to access information on the processing of their personal data shall be subject to NPC guidelines.</li> <li>• Right to Rectification: The data subject has the right to dispute the inaccuracy or error in his or her personal data and have the PIC correct the same within a reasonable period of time.</li> <li>• Right to Erasure or Blocking: The data subject has the right to request for the suspension, withdrawal, blocking, removal, or destruction of his or her personal data from the PIC’s filing system, in both live and back-up systems.</li> <li>• Right to Data Portability: The data subject shall have the right to obtain from the PIC a copy of his or her personal data and/or have the same transmitted from one PIC to another, in an electronic or structured format that is commonly used and allows further use by the data subject.</li> <li>• Right to Damages: The data subjects have the right to be indemnified for any damages sustained due to inaccurate, incomplete, outdated, false, unlawfully obtained, or unauthorized use of their personal data, taking into account any violation of his or her rights and freedoms as data subject.</li> </ul>
<p><b>Singapore</b></p>	<p>The Lincoln Electric Welding School collects, uses, discloses and processes Personal Information in accordance with Singapore’s Personal Data Protection Act 2012 (“PDPA”). Under the PDPA, individuals have the following rights:</p> <ul style="list-style-type: none"> <li>• Withdraw Consent: You may withdraw consent for the collection, use or disclosure of your Personal Information.</li> <li>• Request for Access to Personal Information: You may request for access to Personal Information in the possession or under the control of the Lincoln Electric Welding School and information about the ways in which your Personal Information may have been used or disclosed during the preceding year by Lincoln Electric Welding School.</li> <li>• Request for Correction to Personal Information: You may request for correction of</li> </ul>



	Personal Information which is in the possession or under the control of Lincoln Electric Welding School.
<b>Thailand</b>	<p>As the data subject, you have the following rights in relation to your Personal Information, subject to the rules, methods and conditions under the laws on personal data protection of Thailand. In this regard, if you wish to make a request to exercise your rights, you can contact us by using the contact details set out in Section 15 (Contact Us) of this Student Notice.</p> <p>Alternatively, you may contact our local representative in Thailand at:  Richard Lane  Email: <a href="mailto:Richard.Lane@lincolnelectric.com.sg">Richard.Lane@lincolnelectric.com.sg</a>  Telephone number: +6568545392</p> <ul style="list-style-type: none"> <li>• Right of Access. You have the right to access your Personal Information and may request that we provide you with a copy of such Personal Information in accordance with the requirements under the laws on personal data protection of Thailand. [For accessing your Student Records, please refer to Section 9 (Accessing and Transferring Student Records) of this Student Notice.]</li> <li>• Right to Data Portability. You have the right to obtain your Personal Information, including to request that your Personal Information is transmitted to another data controller or to you, except where it is technically unfeasible, in accordance with the requirements under the laws on personal data protection of Thailand. [For transferring your Student Records, please refer to Section 9 (Accessing and Transferring Student Records) of this Student Notice.]</li> <li>• Right to Object. You have the right to raise an objection to the processing of your Personal Information in certain circumstances prescribed under the laws on personal data protection of Thailand.</li> <li>• Right to Erasure. You may request that we delete, destroy or anonymize your Personal Information in certain circumstances prescribed under the laws on personal data protection of Thailand.</li> <li>• Right to Restriction. You have the right to request that we restrict the processing of your Personal Information in certain circumstances prescribed under the laws on personal data protection of Thailand.</li> <li>• Right to Rectification. You have the right to request that your Personal Information be rectified if the Personal Information is inaccurate, not up-to-date, incomplete, or may cause a misunderstanding.</li> <li>• Right to Withdraw Consent. If we rely on your consent as the lawful basis for processing your Personal Information, you have the right to withdraw such consent which has been provided to us at any time.</li> <li>• Right to Lodge a Complaint. If you have any concerns or questions about any aspect of our practices in relation to your Personal Information, please contact us using the contact details set out in Section 15 (Contact Us) of this Student Notice or in this Schedule 1. Where there is a reason to believe that we are in breach of Thailand’s laws on personal data protection, you have the right to lodge a complaint to the expert committee appointed by the Personal Data Protection Committee in accordance with the rules and methods prescribed under the laws on personal data protection of Thailand.</li> </ul>
<b>United States</b>	The Lincoln Electric Welding School may administer programs and curriculum that are



<p><b>(Federal Funding/Grant Programs)</b></p>	<p>subject to federal or state regulations based on the disbursement and receipt of a federal or state grant, or our participation in a cooperative agreement, contract, subgrant, or subcontract with a federal or state agency. For example, the Lincoln Electric Welding School participates in the Expanding Community College Apprenticeship Initiative operated by the American Association of Community Colleges (“AACC”) pursuant to the terms and conditions of a cooperative agreement between the AACC and the U.S. Department of Labor. In the event you participate in such a federal or state program, you hereby acknowledge and agree that your Personal Information will be collected, used, and otherwise processed in accordance with the applicable rules, regulations, and requirements related to the federal or state program and this Student Notice.</p>
<p><b>United States (Disclaimer)</b></p>	<p>THIS STUDENT NOTICE DOES NOT FORM, IN FULL OR IN PART, ANY CONTRACT OR OTHER AGREEMENT OF EMPLOYMENT BETWEEN YOU AND THE LINCOLN ELECTRIC WELDING SCHOOL AND TO THE EXTENT A CONTRACT OF EMPLOYMENT DOES EXIST BETWEEN YOU AND LINCOLN ELECTRIC WELDING SCHOOL, NOTHING IN THIS STUDENT NOTICE SHALL BE CONSTRUED TO (IN ANY WAY) TERMINATE, SUPERSEDE, UNDERMINE, OR OTHERWISE MODIFY THE STATUS OF THE EMPLOYMENT OR PROFESSIONAL RELATIONSHIP BETWEEN YOU AND THE LINCOLN ELECTRIC WELDING SCHOOL, PURSUANT TO WHICH THE LINCOLN ELECTRIC WELDING SCHOOL MAY TERMINATE THE EMPLOYMENT OR PROFESSIONAL RELATIONSHIP AT ANY TIME, WITH OR WITHOUT CAUSE, AND WITH OR WITHOUT NOTICE. BY PROVIDING YOUR PERSONAL INFORMATION TO THE LINCOLN ELECTRIC WELDING SCHOOL, YOU HEREBY ACKNOWLEDGE AND UNDERSTAND THAT WE MAY COLLECT, PROCESS, AMEND, DISCLOSE, DISPOSE, OR OTHERWISE USE YOUR PERSONAL INFORMATION IN ACCORDANCE WITH THIS STUDENT NOTICE, AND YOU AGREE TO THE TERMS AND CONDITIONS SET FORTH HEREIN.</p>
<p><b>United States (Marketing)</b></p>	<p>You have the right to opt out of receiving electronic direct marketing communications from us. All electronic direct marketing communications that you may receive from us, such as e-mail messages, will give you an option of not receiving such communications from us in the future. We do not share Personal Information with third parties that we have reason to believe use such information for their own direct marketing purposes.</p>
<p><b>United States (California)</b></p>	<p>Pursuant to the California Consumer Privacy Act of 2018, as amended (“CCPA”), California residents have certain data privacy rights, including the following:</p> <ul style="list-style-type: none"> <li>• <i>Right to Know:</i> The right to know about what personal information the Lincoln Electric Welding School collects about you, and our intended use of, and purposes for collecting, your personal information. The personal information that we collect from you, the purposes for which it is used, the source of such personal information, and the parties to whom we share your personal information, among other issues, are set forth above.</li> <li>• <i>Access:</i> The right to access general categories and/or the specific pieces of personal information we have collected, used, disclosed, or sold about you over the past twelve (12) months, including the sources from which the personal information was collected; the business or commercial purpose for which your personal information was collected; used, disclosed, or sold; and, the third parties with whom we have shared</li> </ul>





	<p>your personal information.</p> <ul style="list-style-type: none"> <li>• <i>Deletion/Erasure:</i> The right to request that we delete/erase your personal information under certain circumstances.</li> <li>• <i>Data Portability:</i> The right to request that the Lincoln Electric Welding School transfers, to the extent technically feasible, personal information in certain forms and formats.</li> <li>• <i>Nondiscrimination:</i> The right not to be subject to discrimination for asserting your rights under the CCPA.</li> </ul> <p>To exercise any of the CCPA’s data privacy rights set forth herein, please contact us in accordance with the “Contact Us” section listed above. If you would prefer, you may designate an authorized agent to submit a CCPA privacy request on your behalf. An authorized agent must be registered with the California Secretary of State to conduct business in California.</p> <p><u>Privacy Request Verification Process.</u> If you (or your authorized agent) makes any request related to your personal information under the CCPA, the Lincoln Electric Welding School 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. The Lincoln Electric Welding School will, to the extent required or permitted by law, require you (or your authorized agent) to verify your request via email or other means and match at least two pieces of personal information we have previously collected from you before granting you access to, or erasing, specific pieces or categories of personal information, or otherwise responding to your request. We may require written documentation that demonstrates a third party is authorized to serve as your agent for the purposes of submitting the requests set forth herein, unless you have provided the authorized agent with power of attorney pursuant to California Probate Code §§ 4121 to 4130. None of the CCPA’s rights are absolute, and they are subject to legal and regulatory exceptions and exemptions. For more information about the CCPA, please see <a href="https://oag.ca.gov/privacy/ccpa">https://oag.ca.gov/privacy/ccpa</a>.</p> <p><u>Opt-Out Rights / Do Not Sell My Personal Information.</u> California residents have the right to opt out of the sale of their personal information. The Lincoln Electric Welding School does not sell your personal information to third parties for profit or valuable or other monetary consideration.</p>
<p><b>United States (Nevada)</b></p>	<p>The Lincoln Electric Welding School does not currently conduct “sales” of personal information for purposes of Nevada law. Notwithstanding the foregoing, 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 information to others. If you would like to exercise this right, please contact us in accordance with the “Contact Us” section listed above.</p>
<p><b>Vietnam</b></p>	<p>Pursuant to the data protection laws of Vietnam, you have certain data privacy rights, including the following:</p> <ul style="list-style-type: none"> <li>• Access. The right to request us to provide the personal information we have collected and stored about you.</li> <li>• Rectification. The right to request us to update or amend the personal information that we have collected and stored about you.</li> </ul>



- Deletion/Erasure. The right to request that we delete/erase your personal information under certain circumstances.

If, however, there are technical or other circumstances that prevent us from complying with your request, we will notify you, subject to any legal or statutory obligation to which we are subject.

To exercise any of the rights set forth herein, please contact us in accordance with the “Contact Us” section listed above.