



**MARTINREA INTERNATIONAL INC.**

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**Responsible Function: MARTINREA LEGAL DEPARTMENT**

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**Policy Name: GLOBAL DATA PROTECTION POLICY**

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<b>Policy No.:</b> LP-20-V1-2018	<b>Revision Number:</b> 1	<b>Last Revised:</b> June 14, 2018	<b>Page 1 of 5</b>
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<b>Policy Scope:</b> ALL LOCATIONS	<b>ISSUED AND APPROVED BY:</b> CHIEF EXECUTIVE OFFICER
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**POLICY SUMMARY**

**1. What is this Policy?**

This Global Data Protection Policy (the “**Policy**”) sets out the requirements for Martinrea International Inc., and its subsidiaries and affiliates (together “**Martinrea**”) to comply with applicable data protection and privacy laws.

**2. Why is this Policy important?**

This Policy establishes the guiding principles that Martinrea must follow in the processing of personal data and plays an important role in ensuring that Martinrea and its employees, including temporary staff, agents, consultants, contractors, vendors and service providers acting on Martinrea’s behalf process personal data legally, fairly and in accordance with the rights of individuals. This Policy addresses, among other things, the legal grounds to process personal data, disclosure of personal data, the transfer of personal data, the rights of data subjects, marketing activities and data security.

**The penalties for contraventions of data protection and privacy laws can be serious, including large fines.** As such, Martinrea, acting in the best interests of our Company, cannot and will not tolerate any violations of this Policy, which will be sanctioned with disciplinary action up to and including termination of employment.

**3. What you should do?**

Ensure that you are aware of the principles set out in this Policy and always keep in mind data protection obligations when processing the personal data of individuals. Always follow all applicable laws relating to data protection. If you ever become aware of a personal data security breach, immediately contact the Legal Department. If you have any questions or concerns about this Policy, or are concerned that you or the company may be negatively affected by any behaviour that is contrary to this Policy, please contact the Legal Department.

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<b>Policy No.:</b> LP-20-V1-2018	<b>Revision Number:</b> 1	<b>Last Revised:</b> June 14, 2018	Page 2 of 5
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1. **PURPOSE**

1.1 This Global Data Protection Policy (the “**Policy**”) sets out the minimum requirements to ensure compliance by Martinrea International Inc., and its subsidiaries and affiliates (together “**Martinrea**”) with applicable privacy and data protection laws and regulations (“**Data Protection Requirements**”). “Personal Data” is defined as any information that directly or indirectly identifies an individual.

2. **SCOPE**

2.1 This policy applies to all Martinrea employees worldwide including, temporary staff, agents, consultants, contractors, vendors and service providers in their processing of Personal Data on behalf of Martinrea.

2.2 This Policy is supplemented by additional Martinrea policies and guidance dealing with specific aspects of Data Protection Requirements.

3. **DATA PROTECTION PRINCIPLES**

3.1 Martinrea has adopted the following principles to govern its processing of Personal Data:

- Personal Data shall be processed fairly and lawfully. See Sections 4 and 5 below.
- Personal Data shall be processed only for specified, explicit, lawful, and legitimate purposes, and shall not be further processed in any manner incompatible with the original purposes except: (i) with the valid consent of the individual to whom the Personal Data relates (a “**Data Subject**”); or (ii) where allowed by Data Protection Requirements.
- Personal Data shall be adequate, relevant and not excessive in relation to the purposes for which the Personal Data are processed.
- Personal Data shall be accurate, complete and kept up to date.
- Personal Data shall not be kept in a form which permits identification of the Data Subject for longer than necessary.
- Personal Data shall be collected and processed in accordance with the rights of Data Subjects. See Section 8 of this Policy.
- Appropriate technical and organizational measures shall be taken in relation to Personal Data. See Section 9 of this Policy.
- Personal Data must not be transferred from the European Economic Area (“**EEA**”) to a country outside the EEA unless the country is deemed to provide an adequate level of data protection or unless one of the circumstances described in Section 7 of this Policy applies.

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#### 4. **LEGAL GROUNDS FOR PROCESSING**

- 4.1 In certain jurisdictions, the processing of Personal Data must be based on one or more specific legal grounds. These include, for example, where the processing is necessary for Martinrea to comply with an EU/Member State legal obligation that is applicable to Martinrea, or where the processing is necessary for the purposes of the legitimate interests pursued by Martinrea (unless such interests are overridden by the rights of the Data Subject).
- 4.2 Where Martinrea processes criminal records or offences data, Martinrea must ensure it does this only where permitted pursuant to specific legislation and, where applicable, Martinrea maintains a policy with respect to such processing.
- 4.3 In certain jurisdictions, where Martinrea processes Special Categories of Personal Data (i.e., employee health data), this must be kept to a minimum and in any event only as strictly necessary. The most relevant legal ground will be where such processing is necessary so Martinrea can comply with employment law and such processing is specifically authorized or required by law.

#### 5. **DATA PROTECTION NOTICES**

- 5.1 Where a Martinrea entity is subject to the EU General Data Protection Regulation (GDPR), a data protection notice setting out specific information must be provided to a Data Subject before processing their Personal Data. Please contact the Legal Department if you have any questions.

#### 6. **DISCLOSURE OF PERSONAL DATA TO DATA PROCESSORS AND OTHER THIRD PARTIES**

- 6.1 A data processor processes Personal Data on behalf of and in accordance with instructions from a data controller, for example an IT services provider hosting Personal Data for Martinrea. Personal Data may not be provided to any data processor by Martinrea unless a written agreement has been entered into containing specific data processing provisions. Template data processing provisions that all data processors must agree to comply with can be obtained from the Legal Department.
- 6.2 To the extent Martinrea discloses Personal Data to third parties who are acting as data controllers (for example, disclosures in response to a request made by a regulator), Martinrea will take reasonable and appropriate steps to maintain the required level of data protection.

#### 7. **TRANSFERS OF PERSONAL DATA FROM THE EEA**

- 7.1 Personal Data must not be transferred from the EEA to a country which is not considered to provide an adequate level of protection unless an exemption applies, for example: (i) the data exporter in the EEA and the data importer outside the EEA have entered into the EU's Standard Contractual Clauses ("**Model Contracts**"); or (ii) the data importer in the US is certified under the US Privacy Shield framework ("**Privacy Shield**").
- 7.2 Martinrea has entered into Model Contracts for intra-group transfers of Personal Data. International transfers made by Martinrea to third parties outside the EEA will be made in accordance with Data Protection Requirements. A copy of these safeguards are made available to Data Subjects on request.

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8. **DATA SUBJECT RIGHTS**

8.1 Data Subjects have certain rights under Data Protection Requirements which may be subject to limitations and/or restrictions (e.g., the right to request access to and rectification or erasure of their Personal Data). Martinrea has in place internal guidelines for responding to such requests from Data Subjects.

9. **DATA SECURITY**

9.1 Appropriate physical, technical, and organizational measures are adopted by Martinrea to protect Personal Data against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access, having regard to the cost of implementation, the nature of the data, and the risks to which they are exposed.

9.2 Employees who are required as part of their job description to process Personal Data will receive training and guidance on the security of data. However, Martinrea expects all of its employees to be aware of the basic security principles as set out in this Policy, Martinrea's Computer Network and Internet Access Policy and the Information Technology Procedures for Employees Policy.

9.3 It is the responsibility of all employees to report all security breaches (including without limitation, personal data breaches), to the Legal Department immediately.

9.4 Employees should ensure that they are familiar with the processes for dealing with a personal data breach as set out in Martinrea's Intrusion Response Plan. A copy of this Plan can be obtained from the Legal Department.

10. **GENERAL**

10.1 This Policy may be revised at any time. Notice of significant revisions shall be provided through appropriate mechanisms.

Thank you in advance for your understanding and co-operation. If at any time you have any questions or concerns regarding this Policy, please do not hesitate to contact me, Armando or Kerri so we can personally address your questions or concerns.

Sincerely,

Pat D'Eramo  
President and Chief Executive Officer

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Page 5 of 5

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