

# **Privacy Notice**

**Last Updated March 2025** 

# 1. Introduction to Privacy Notice

This website is owned by Tennant Company, headquartered at 10400 Clean Street, Eden Prairie, MN 55344-2650, United States ("Tennant"), and operated for and on behalf of itself and its worldwide subsidiaries (the "Tennant Group"). A list of the companies forming the Tennant Group is available in Exhibit 21 <a href="here">here</a>.

This Privacy Notice relates to our website and apps (collectively "website") and describes our practices regarding collection, use, sharing, and security of personal information. Tennant has a separate Privacy Policy applicable to its employees. We recommend checking this page frequently to review any updates. This Privacy Notice also provides details of the rights that you have under applicable data protection laws.

"Personal information" (also known as "personal data") is information about you (a "data subject") from which you can be identified, directly or indirectly, in particular by reference to an identifier such as your name, an identification number, location data, an online identifier, or other information about your identity. Most of "your information" will constitute personal information.

The terms "Tennant", "we," "us," "our," and "ours" when used in this Privacy Notice means Tennant, or any member of the Tennant Group.

For the purposes of applicable data protection laws, we are "controllers" of your personal information as it is described in this Privacy Notice. This means we make decisions about how and why your information is used, and have a responsibility to make sure that your rights are protected when we do so.

The terms "you," "your," and "yours" when used in this Privacy Notice mean any user of our website, any person contacting us, or any customer of ours.

If you have any questions, please contact us using the details in the "Feedback" section below.

## **Notification of Changes to This Notice**



We are continually improving our methods of communication and adding new functionality and features to this website and to our existing services. Because of these ongoing changes, changes in the law, and the changing nature of technology, our data practices may change from time to time and in turn, our Privacy Notice may also be updated to reflect these changes. We will alert you when changes have been made by indicating the date this Privacy Notice was last updated or as otherwise may be required by applicable laws. Regardless of whether we notify you, we encourage you to check this Privacy Notice frequently.

# 2. Collection of your information

You may provide us with your information in order to receive information, products, or services from us. We may request information about you which enables us to provide a personalized service to you. The information you give us is either manually or electronically stored in our databases.

To comply with applicable laws and regulations, we may need to request additional evidence of identity from you, and we may use a credit reference agency for this purpose (who will record that an inquiry has been made).

Where permitted by local law, we also reserve the right to monitor and/or record your communication with us by mail, voice, email, visits to our website, or any other form of transmission for the purposes of quality control, security, and other business needs. Any information about you contained in such recorded information will be processed in accordance with this Privacy Notice.

### The categories of personal information that we may collect are as follows:

- **Identity Data:** This includes information such as your first name, last name, or similar identifier, title, date of birth, and gender.
- **Contact Data:** This includes information such as your billing address, delivery address, email address, and telephone numbers.
- **Financial Data:** This includes information such as your bank account and payment card details.
- **Transaction Data:** This includes information such as details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data:** This includes information such as your internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website.
- **Profile Data and the Content of your Communications:** This includes information such as your username and password, purchases or orders made by you, your interests, preferences, feedback, and survey responses.



- **Usage Data:** This includes information such as how you use our website, products, and services.
- Marketing and Communications Data: This includes information such as your preferences in receiving marketing from us and our third parties and your communication preferences, including any consents you have given to us.

Where we need your information to be able to offer you our products and services, we will not be able to do so if you do not provide us with it.

## We collect this information through various means, including:

- **Direct Interactions:** When you provide information directly to us, such as when you create an account, make a purchase, or contact customer support.
- Indirectly from Your Devices or Through Automated Technologies: When you interact with our website, we may automatically collect Technical Data using cookies and similar technologies.
- **Third Parties:** We may receive personal information about you from various third parties, such as analytics providers and advertising networks.
- Publicly Available Information

# 3. Use of Personal Information

We collect and process your information only for the following purposes:

- **Providing Services:** To provide, operate, and maintain the services we offer to you.
- Improving Services: To improve our services, including through analytics.
- **Customer Support:** To respond to your inquiries and provide customer support.
- Marketing: To send you marketing communications about our products and services, where permitted by law.
- **Legal Compliance:** To protect our legal rights and to comply with applicable laws and regulations.
- **Business Operations:** To manage our business operations, such as accounting and fraud prevention.
- **Monitoring / Recording:** We may monitor, record, store and use any telephone, email or other communication with you in order to check any instructions given to us, for training and quality control purposes and for security reasons.

Legal bases for processing your personal information



We will only process your personal information when we have a legal basis for doing so. We set out in this section each of the legal bases we rely on, why and how we use your data, and the categories of personal information we process.

Category of personal information	Purpose of processing	Legal basis
Identity Data, Contact Data, Financial Data, Transaction Data, Profile Data and the Content of your Communications	<b>Providing Services:</b> To provide, operate, and maintain the services we offer to you	In our legitimate interests to provide, operate and maintain our services that we offer to you
Identity Data, Contact Data, Financial Data, Transaction Data, Technical Data, Profile Data and the Content of your Communications, Usage Data, Marketing and Communications Data	Improving Services: To improve our services, including through analytics	In our legitimate interests to improve our services, and offer the best website and services to you  In respect of our processing of non-essential cookie data, with your consent
Identity Data, Contact Data, Financial Data, Transaction Data, Technical Data, Profile Data and the Content of your Communications, Usage Data, Marketing and Communications Data	Customer Support: To respond to your inquiries and provide customer support	In our legitimate interests to support our customers in the most effective and efficient manner possible



Identity Data, Contact Data, Technical Data, Usage Data, Marketing and Communications Data	Marketing: To send you marketing communications about our products and services, where permitted by law	In our legitimate interests to market our products and services that may be of interest to you  Where required under applicable law, with your consent
Identity Data, Contact Data, Financial Data, Transaction Data, Technical Data, Profile Data and the Content of your Communications, Usage Data, Marketing and Communications Data	Legal Compliance: To protect our legal rights and to comply with applicable laws and regulations	When we need to comply with the law  In our legitimate interests to best serve our aims and protect our business, people and website including for the regular enforcement of rights in judicial, administrative or arbitration proceedings
Identity Data, Contact Data, Financial Data, Transaction Data, Technical Data, Profile Data and the Content of your Communications, Usage Data, Marketing and Communications Data	Business Operations: To manage our business operations, such as accounting and fraud prevention	When we need to comply with the law  In our legitimate interests to best manage our business, including through meeting regulatory obligations and fraud prevention



Identity Data, Contact Data,	Monitoring / Recording:	With your consent
Financial Data, Transaction	We may monitor, record,	
Data, Profile Data and the	store and use any	
Content of your	telephone, email or other	When we need to comply
Communications	communication with you in	with the law
	order to check any	
	instructions given to us, for	
	training and quality control	In our legitimate interests to
	purposes and for security	provide training and quality
	reasons	control, and for security
		reasons

# 4. Cookies and similar technologies

We use "cookies" on our website. A cookie is a small piece of information which is sent to your browser and stored in your browser or on your computer's hard drive. You can set your browser to notify you when you receive a cookie. This enables you to decide if you want to accept the cookies or not. For more information about our practices regarding the use of cookies on this website, please review our **Cookies Policy**.

# 5. Disclosure of Your Personal Information

We may share your information with third parties under the following circumstances:

- We may share various details about you with other members of the Tennant Group, our partners, authorized distributors, advisers and other agents in order to administer our business, provide you with the specific products or services you require or to look after products or services you currently receive from us;
- Your information may be transferred to third parties who act for us. For example, sometimes a third party may have access to your information in order to support our information technology or to handle mailings on our behalf;
- We may share your personal information with external advisors (such as lawyers, accountants or financial advisors) who are helping us with our business or compliance obligations;
- We may share or transfer the information in our databases to government authorities or law enforcement officials, for example to comply with a legal or regulatory requirement, for



the administration of justice, interacting with anti-fraud databases and denied parties' lists, to protect your interests, to protect the security or integrity of our databases or our website, to take precautions against legal liability; or

• If we sell or buy any business or assets, dissolution or similar event, in which case we may disclose your information to the prospective seller or buyer of such business or assets.

Where appropriate, before disclosing your information to a third party we contractually require the third party to take adequate precautions to protect that data and to comply with applicable law.

# 6. Data Integrity and Security

We strive to maintain the reliability, accuracy, completeness, and currency of your information in our databases and to protect the privacy and security of our databases. The security measures in place on our website and computer systems aim to protect the loss, misuse, or alteration of the information you provide to us. Unfortunately, no method of data transmission over the internet is completely secure. Unauthorized entry or use, hardware or software failures, events outside our control and other factors, may compromise the security of your information. Nevertheless, we will comply with our obligation to implement appropriate technical and organizational measures to ensure a level of security of personal information appropriate to safeguard against security risks – including of a personal data breach.

# 7. Retention of Information

We keep your personal information only for as long as reasonably necessary for the purposes for which it was collected, to comply with any applicable legal or regulatory requirements, or our data retention policy. We may keep an anonymized form of your personal information, which will no longer refer to you, for statistical purposes without time limits, to the extent that we have a legitimate and lawful reason to do so. If you are located in California, the European Economic Area, or in the UK, you may contact us about further detail about our data retention periods in relation to your personal information.

# 8. Your Personal Information Rights

Your local privacy laws **may** grant you rights with respect to your personal information, and we will not knowingly discriminate against you because you have exercised any of your privacy rights. These rights differ based on the local laws that apply to you but could include one or more of the following:



- Right to **transparency** in how we collect and use your personal information.
- Right to confirm we process your personal information and, if so, to access including, where possible, in a portable format.
- Right to information **accuracy** and to **correct**, **complete**, and **delete (erase) or anonymize** your personal information.
- Right to **restrict** (**or block**, **where relevant**) **or object to the processing** of certain personal information, including, where relevant, the right to **opt out** of our processing of your sensitive personal information and opt out of (or request review of) automated decision making or profiling that produces a legal or similarly significant effect.
- Right to meaningful consent and the right to withdraw consent when we process your
  personal information based on your consent without affecting the lawfulness of
  processing based on consent before its withdrawal.
- Right to **opt out of marketing emails** from us, in which you may email us or click the unsubscribe link at the bottom of each email that you receive from us.
- Right to **opt out of the use of your personal information for profiling or targeted advertising**, including online behavioral advertising, and to **opt out of the sale or sharing of their personal information**, in which you may, in addition to the below, click the "Do not sell or share my personal information/limit the use of my personal information" link or change the cookie settings through our cookie banners.

If you wish to make a subject access request relating to personal information held about you by the Tennant Group, please contact us using the details in the "Feedback" section below.

**Important**: These rights are **not** absolutely guaranteed and there are several exceptions where we may not have an obligation to fulfill your request. We are only required to honor these rights to the extent the requested rights have been granted and apply to you under applicable data protection laws.

You may **appeal** an adverse decision on your requests by emailing or writing to us, and you have the right to **lodge a complaint** to your local regulator or attorney general if you are not satisfied with our responses to your requests or how we manage your personal information. However, we encourage you to contact us first so we can address your concerns directly.

See also Brazil-specific Appendix

# 9. Links to Other Websites

Our website may contain hyperlinks to websites that are not operated by us. Any such hyperlinks are provided for your reference and convenience only and do not imply any endorsement of the activities of these third-party websites or any association with their operators. We do not control these websites and are not responsible for their data or privacy practices. We urge you to review



any privacy policy posted on any site you visit before using the site or providing any information about yourself.

# 10. International Transfer of Data

If you are visiting our website from a country other than the country in which our servers are located (currently the U.S.), the various communications will necessarily result in the transfer of information across international boundaries.

We may transfer data between members of the Tennant Group, and our offices and third-party processors to a country which may not provide the same level of privacy protection as that provided by the country in which the information was collected. Where your personal information is transferred across international boundaries we will take reasonable steps to put in place appropriate technical, organizational, contractual and other lawful means to adequately protect your personal information. If you are located in the EEA, the UK or another country that has legal restrictions on transferring personal data internationally (e.g., Brazil), we take steps to ensure your personal information is protected, including by entering into contracts that have been approved by the relevant authorities (such as "standard contractual clauses" or an "international data transfer agreement"). You may contact us for a copy of the safeguards which we have put in place to protect your personal information in these circumstances.

# 11. Opt-out

If you no longer wish to receive information from us and want to be removed from our standard mailing list you can "unsubscribe" by following the instructions in the email received from us or by mail by writing to us at the address given below. Please allow up to twenty-eight days for the unsubscribe process to be completed.

# 13. Feedback

We welcome comments about this notice. If you have any questions about this notice, or any part of our service you may contact us by emailing Tennant at **privacy@tennantco.com** or by writing to us at the addresses found below:



## **How to Contact Us**

Questions, comments and requests regarding this Privacy Notice should be addressed to our **Data Protection Office** via email at <a href="mailto:privacy@tennantco.com">privacy@tennantco.com</a> or by regular mail at:

### In the United States:

Tennant Company 10400 Clean Street Eden Prairie, MN 55344-2650 USA

Attn: Legal Department - US Data Protection Office

Telephone: 763-540-1200

#### In the EU:

IP Cleaning S.r.l. Viale Treviso 63 Portotecnica (VE), 30026

Attn: Italy Data Protection Office

Telephone: +390421205664

# In the United Kingdom:

## **Tennant UK Cleaning Solutions Limited**

Kingsfield Business Park Gladstone Road Northhampton NN5 7PP

UK

Attn: UK Data Protection Office

Telephone: +441617288303

### In Canada

### **Tennant Sales & Service Canada ULC**

Suite 2600 Three Bentall Centre PO Box 49314 595 Burrard St. Vancouver, BC V7X 1L3 Attn: Canada Data Protection Office + 1-800-361-9050



#### In Mexico

### Tennant Ventas & Servicios De Mexico S.A. De C.V.

Ave. Chichimeco 101
Parque Industrial Chichimeco
Jesús María, Aguascalientes
CP 20900
Mexico

Attn: Mexico Data Protection Office

Telephone: +52-4491393110

### In Brazil

### Sociedada Alfa Ltda

Rua Barão de Campinas 715 01201-902 São Paulo SP Brasil Attn: Brazil Data Protection Office +55-11-3320-6999

#### In Australia

### **Tennant Australia PTY Limited**

Unit 2 10 Johnston Crescent Horsley Park NSW 2175 Attn: Australia Data Protection Office +61 1800 226 843

# In Republic of China

## Tennant Cleaning Systems and Equipment (Shanghai Co. Ltd)

Lane 928 Shenhong Road Unit 608 Building 5 Hongqiao Jia Hui Minhang District Shanghai 201106



Attn: China Data Protection Office +86-21-6700-8000

# In Japan

# Tennant Company Japan Branch, Ltd

9F Industry & Trade Center 2 Yamashita-cho, Naka-ku Yokohama, Kanagawa 231-0023 Japan Attn: Japan Data Protection Office +81-45-640-5630

### In New Zealand

## **Tennant New Zealand Ltd**

18 Onslow Ave
Papatoetoe
Auckland 2104
New Zealand
Attn: New Zealand Data Protection Office
+ 64-9-253-9013



## **Brazil Appendix**

Article 18. Data subjects shall have the right to obtain from the controller, regarding their data processed by said controller, at any time and upon request:

- I confirmation of the existence of the processing;
- II access to the data;
- III correction of incomplete, inaccurate or outdated data;
- IV anonymization, blocking or erasure of unnecessary or excessive data or data processed in noncompliance with the provisions of this Law;
- V portability of data to another service provider or product provider, upon express request, according to the regulations of the national authority, complying with trade and industrial secrets; (Law No. 13,853/2019)
- VI erasure of the personal data processed with the consent of the data subject, except for the events set forth in article 16 of this Law:
- VII information on government and private entities with which the controller has shared data;
- VIII information on the possibility of denying consent and the consequences of such denial;
- IX revocation of consent, pursuant to the provisions of paragraph 5 of Article 8 of this Law.
  - Paragraph 1. Data subjects have the right to petition, regarding their data, against the controller before the national authority.
  - Paragraph 2. Data subjects may oppose to the processing based on one of the events of waiver of consent, in case of noncompliance with the provisions of this Law.
  - Paragraph 3. The rights set forth in this article shall be exercised upon express request by the data subject, or a legally appointed representative, to a processing agent.
  - Paragraph 4. In case it is impossible to immediately adopt the measure mentioned in paragraph 3 of this article, the controller shall send a reply to the data subject, in which he or she may:



i – communicate that he or she is not a data processing agent and indicate, whenever possible, who the agent is; or

ii – indicate the reasons de facto or de jure that prevent the immediate adoption of the measure.

Paragraph 5. The request referred to in paragraph 3 of this article shall be met free of charge to the data subject, within the time periods and terms provided in regulation.

Paragraph 6. The controller shall immediately communicate the processing agents with whom he or she has shared data about any correction, erasure, anonymization or blocking of data, so that they can repeat an identical procedure, except in cases in which this action is proven impossible or involves disproportionate effort (Law No. 13,853/2019)

Paragraph 7. The portability of personal data referred to in item V of the head provision of this article does not include data that has already been anonymized by the controller.

Paragraph 8. The right referred to in paragraph 1 of this article may also be exercised before consumer defense entities.