**Website Privacy Policy**

We have adopted this Privacy Policy in order to demonstrate our commitment to your privacy. This Privacy Policy states the policies of Lincoln Electric regarding the collection, processing, and transfer of any personal information relating to (1) our customers, vendors, or suppliers, or (2) an individual accessing websites maintained by Lincoln Electric (referred to as “Personal Data”).

**For information on how we process personal information on individuals in the EU, please click** [**here**](#ForSiteVisitorsFromEU)**.**

This Privacy Policy provides information on the following:
     • What Personal Data we collect
     • How we use that Personal Data
     • How we may share that Personal Data
     • How we protect that Personal Data
     • Your choices regarding your Personal Data

Lincoln Electric will only process Personal Data consistent with this Privacy Policy and the purposes for which it was collected or authorized by you. To the extent necessary for those purposes, Lincoln Electric will take reasonable steps to ensure that Personal Data is accurate, complete, current as provided, and reliable for its intended use.

To the extent possible, before you submit your Personal Data to Lincoln Electric, you will be informed about certain rights you have regarding Personal Data you submit and how that Personal Data will be processed and used by Lincoln Electric. At that time, you may consent to the use of and submit your Personal Data by Lincoln Electric or decline to consent to such use and not submit your Personal Data.

 **What is Personal Data?**

The term “Personal Data” means “any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.”

**What Personal Data We Collect and How We Use That Personal Data?**

**Customer, Vendor, and Suppliers:** Lincoln Electric may collect and process the following categories of Personal Data concerning our customers, vendors, and suppliers: name and surname, contact details, job title, bank account details and financial information (including credit/income history), transaction history, communications and criminal records. We process this information for facilitate routine and common business practices, such as those related to sales orders and management, promotion and quotation submitting, warranty management, credit collection, compliance with the US Foreign Corrupt Practices Act, Export Controls and other legal requirements, accounting, and defense of our interests and claims.

**Website Users:** Lincoln Electric collects Personal Data for the purpose of providing information or updates about Lincoln Electric or its products or arc welding to individuals who visit the Site. We may also use Personal Data you submit for internal purposes including the administration of the Site, data analytics, and compliance with law or legal process and Lincoln Electric's policies and procedures. You also provide new, or updated or corrected Personal Data to Lincoln Electric from time-to-time

**Who Provides Use With Your Personal Data?**

The Personal Data that we collect and process on our customers, vendors, and suppliers, is derived from the individual or from his/her business. For website users, we collect Personal Data that you choose to enter into the Site.

Lincoln Electric may also receive Personal Data from third parties who provide services to us, such as trade shows, mailing or other list services. Lincoln Electric may receive the following categories of Personal Data, such as your name, email address, phone number, job title, business or personal address

**Why Do We Process Personal Data?**

Categories of Personal Data collected and purposes for which they are processed are listed below:

* + **Complete a Transaction**: You provide Personal Data to Lincoln Electric so we can provide you services and products or information pertaining to our services and products. Often, this transaction is governed by a binding contract and in order for Lincoln Electric to fulfil the terms and conditions of that contract, we need to collect, use, and retain, your Personal Data.
	+ **Contact Us and Ask the Experts:** You may submit an inquiry or comment to Lincoln Electric along with your name, and contact information (such as address, phone number and email address). Lincoln Electric uses this information for the purpose of replying to your inquiry.
	+ **Questionnaires and Surveys:** Lincoln Electric may ask users of the Site to complete optional online surveys and opinion polls for the purpose of obtaining their input relating to our present or planned products and their use. These surveys help us to better meet your needs.  In conducting these surveys we may ask you to provide your name and contact information (such as address, phone number and email address) so that we can provide you with information about our products and about welding and cutting, for example, by sending you newsletters or other marketing material.
	+ **Product, Accessory and Extended Warranty Orders:** If you purchase products from the Site, we ask for your name, contact information (such as address, phone number and email address), shipping and billing information. You will also be asked to provide your credit card number and security code solely to our credit card processing vendor, 3Delta Systems (3dsi.com), for purposes of payment. Lincoln Electric will not have access to or store your credit card information. For U.S. products, you may also register your Lincoln Electric product on our website so we can provide information updates to you and for this purpose we will ask you for your *name, contact details and product serial and code number*.
	+ **Locating a Distributor:** If you use the Site to locate a nearby Lincoln Electric distributor, we will ask you for a *location*.  Information about your location will be retained and analyzed for statistical business reasons.
	+ **Customer and Investor Updates:** Lincoln Electric asks you to provide name and contact information (such as 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.
	+ **myLincoln Account:** If you create an account on a Lincoln Electric Site, we collect the account information that you submit, such as your name, email address, and log-in information. We also collect information regarding your orders through the account, such as your history of purchases.
	+ **Emails for Marketing Information:** If you give us your email address and consent to receive marketing information, Lincoln Electric may send useful information about Lincoln Electric products and welding and cutting, such as advertisements, videos, contests, rebates and e-newsletters to your email address. Please see the section in this Privacy Policy titled “Your choices regarding your Personal Data” for more information on how to opt out or unsubscribe from such emails.
	+ **Any Other Form of Contact Where You Submit Your Personal Data:** You may provide us with your Personal Data in other ways including, for example, through comment boxes on the Site or by emails through the Site. We will handle any such Personal Data in accordance with this Privacy Policy.
	+ **From Third Parties**: Lincoln Electric may also receive Personal Data from third parties who provide services to us, such as trade shows, mailing or other list services. Lincoln Electric may receive the following categories of Personal Data, such as your name, email address, phone number, job title, business or personal address.

**Do We Collect Special Categories of Personal Data or Information on Children?**

Lincoln Electric does not ask for, and does not collect, Special Categories of Personal Data related to our customers, vendors, suppliers, or website users.

**Children’s Privacy:** The Site is not directed to children under the age of sixteen, unless otherwise provided by applicable laws, and we do not knowingly collect Personal Data from children. We may ask you to confirm that you have not and will not provide such information to us or in postings on the Site when you register. If we become aware that such information has been provided or posted on the Site, we will delete it from our records.

**How Do We Share Your Personal Data?**

Lincoln Electric does not sell or lease any Personal Data, such as email addresses, collected from customers, vendors, and suppliers or from Site users.  The following are the ways we share your information:

* + **Intra-Group**: We share Personal Data about you within Lincoln Electric for all the purposes shown [here](#WhatPersonalDataWeCollectAndHowWeUsePD). A list of all Lincoln Electric entities is available [here](https://www.lincolnelectric.com/en-us/company/Pages/subsidiaries-and-affiliates.aspx).
	+ **Third-Party Service Providers:** We will share your Personal Data with third-party service providers under contract with Lincoln Electric to help us provide services to you and process Personal Data on our behalf for the above-mentioned purposes.  We may, retain a third party to help us determine what marketing information you might find useful. The service providers are bound by law and/or contract to protect the confidentiality and security of personal data, and to only process your personal data to provide requested services and only act on our documented instructions.

Lincoln Electric also shares data with other companies, vendors and business partners to perform functions for it, whereby these companies are themselves responsible to determine the purposes and/or means of the processing and for the lawfulness of the processing. We may disclose your Personal Data to an attorney in the process of obtaining legal advice. We use a third-party service provider to process credit card information you submit.

* + **Required Disclosures:** We may be required to share Personal Data with courts, tribunals, opposing or other related parties to the proceedings and their professional advisors, in response to a court order, subpoena, civil discovery request, other legal process, or as otherwise required by law.
	+ **Legal Compliance and Protections:** We may disclose account and other Personal Data to courts, tribunals, opposing or other related parties to the proceedings and their professional advisors, when we believe disclosure is necessary to comply with the law or to protect the rights, property, or safety of Lincoln Electric, our users, or others. This may include exchanging Personal Data with other companies and organizations for fraud prevention and credit risk reduction.
	+ **Corporate Transactions:** We may disclose your Personal Data to prospective purchasers, their lawyers or professional advisors, of any interest in Lincoln Electric or its assets.

**How Do We Address Site Privacy and Tracking?**

We support the Do Not Track (DNT) browser setting. DNT is a preference you can set in your browser’s settings to let the websites you visit know that you do not want the sites collecting your personally identifiable information.

**Do We Comply With California Online Privacy Protection Act Compliance?**
California residents who use this Site may request that we provide certain information regarding our disclosure, if any, of the user’s Personal Data to third parties for their direct marketing purposes. You can make such a request by [email](http://www.lincolnelectric.com/en-us/support/ask-the-experts/Pages/ask-the-experts.aspx) or by mail to:

The Lincoln Electric Company
22801 St. Clair Avenue
Cleveland, OH 44117

**How We Protect Your Personal Data?**

Lincoln Electric will take reasonable steps to protect the Personal Data it collects from loss, misuse, unauthorized access, disclosure, alteration, and destruction. Lincoln Electric has put in place appropriate physical, electronic and managerial procedures to safeguard and secures the Personal Data it collects from loss and misuse and unauthorized access, disclosure, alteration, or destruction. Please note that despite our reasonable efforts, no security measure is ever perfect or impenetrable, so we cannot guarantee the security of your Personal Data.

 **What About Third Party Websites?**

This Site contains links to other third-party websites. Lincoln Electric does not control and is not responsible for the operation of such websites. Please refer to the privacy policies of those websites if you have questions about their privacy practices.

**Can I Unsubscribe from Emails?**

You may choose to stop receiving marketing or promotional emails by unsubscribing [here](http://www.lincolnelectric.com/LEExtranet/community/newsletters/login.aspx), by clicking on the unsubscribe link at the bottom of the email, or by emailing us your request to unsubscribe.

**How Can I Update My Personal Data?**

You may use the link in the “Contacting Us” section of this policy to provide us with your updated or corrected Personal Data or to request that we delete your Personal Data.

If you have an account and login with us, the Site provides you the option to update or correct information previously provided by [logging into your account](https://www.lincolnelectric.com/en-us/Pages/login.aspx) and clicking User Admin Center and then My Profile to access your Personal Data and correct, amend or delete inaccurate information.

**What is Our Data Retention Policy?**

Lincoln Electric retains your Personal Data collected as reasonably necessary to fulfill the purposes for which Personal Data are collected and to comply with legal obligations or for the establishment, exercise or defense of a legal claim.

For our customers, vendors, and suppliers, we retain their Personal Data for the duration needed to complete or facilitate our contract, agreement, or engagement, and for a reasonable amount of time thereafter in accordance with our legitimate business needs and functions.

We shall retain certain Personal Data of Site visitors for no longer than reasonably necessary to fulfill the purposes for which Personal Data are collected, to comply with legal obligations or for the establishment, exercise or defense of a legal claim.

**Is Personal Data Transferred Across Borders/Internationally?**

Personal Data collected from our customers, vendors, and suppliers or from Site users is stored on servers located in the United States.  In some cases, your Personal Data may also be stored on servers in a country where the Lincoln Electric affiliate is located that sells or markets to your stated location.

**Concerns**
If you have any concerns about the privacy of the Personal Data you have provided to Lincoln Electric, please [email us](http://www.lincolnelectric.com/en-us/support/ask-the-experts/Pages/ask-the-experts.aspx). Lincoln Electric will investigate and attempt to resolve any complaints you have and any disputes regarding the use and disclosure of your Personal Data in accordance with this Privacy Policy.

**Contacting Us**
If you have any questions about this privacy statement, the practices of the Site or your dealings with the Site, you can [email us](http://www.lincolnelectric.com/en-us/support/ask-the-experts/Pages/ask-the-experts.aspx) or contact us at the following addresses:

**Webmaster**
The Lincoln Electric Company
22801 St. Clair Avenue
Cleveland, OH 44117

**privacy@lincolnelectric.com**

**[Consider having European address(es) or link to all entities]**

**PRIVACY POLICY UPDATES**

If we change our Privacy Policy, we will post those changes on this page and update the Privacy Policy modification date above. If we materially change this Privacy Policy in a way that affects how we use or disclose your Personal Data, we will notify you by prominently posting a notice of such changes before making them and by stating the effective date of the changes.

**EUROPEAN UNION INFORMATION PROCESSING**

If you are located in a country in the EU, please see the following details about the processing of your Personal Data by Lincoln Electric.

**Who is responsible for processing of your Personal Data?**

[*Please insert relevant Lincoln Electric Company entity*] (“Lincoln Electric”) is the controller of the Personal Data collected from customers, vendors, or suppliers, or submitted on this Site.

**What Personal Data do we process about you?**

The categories of Personal Data that Lincoln Electric processes about you, for the purposes described below are listed [herein](#WhatPersonalDataWeCollectAndHowWeUsePD).

**Why are we processing your Personal Data and on which legal bases?**

Lincoln Electric processes Personal Data for the purposes we have outlined [herein](#WhatPersonalDataWeCollectAndHowWeUsePD) and for your convenience, also in this section. Where applicable, we will point out, at the time of the data collection, if the provision of the Personal Data is a statutory or contractual requirement and whether you are obliged to provide the Personal Data and the possible consequences of failure to provide such Personal Data.

**Information on Our Customers, Vendors, or Suppliers**

Lincoln Electric may collect and process Personal Data concerning our customers, vendors, and suppliers to facilitate routine and common business practices, such as those related to sales orders and management.

Legal Bases: The processing is justified based on statutory provisions that (1) processing is based on the consent; (2) processing is necessary for Lincoln Electric’s legitimate interests as set out [herein](#WhatPersonalDataWeCollectAndHowWeUsePD); (3) processing is necessary for the performance of a contract to which you are a party; and (4) Lincoln Electric is required to comply with a legal or statutory obligation in the EU or a Member State.

**Information on Lincoln Electric, Distributors and its Products**

This includes processing Personal Data to: provide information or updates about Lincoln Electric or its products, arc welding, safety data sheets (SDS), safety and corporate investor information; carry out optional online surveys and opinion polls to obtain Site visitor’s input relating to our present or planned products and their use; locate a nearby Lincoln Electric distributor.

Legal Bases: The processing is justified based on statutory provisions that (1) processing is based on the consentof the Site visitor; (2) processing is necessary for Lincoln Electric’s legitimate interests as set out [herein](#WhatPersonalDataWeCollectAndHowWeUsePD); (3) processing is necessary for the performance of a contract to which you are a party; and (4) Lincoln Electric is required to comply with a legal or statutory obligation in the EU or a Member State.

**Site and myLincoln Administration**

This includes processing Personal Data to: carry out Site and myLincoln Account administration.

Legal Bases: The processing is justified based on (1) your consent; (2) processing is necessary for Lincoln Electric’s legitimate interests as set out [herein](#WhatPersonalDataWeCollectAndHowWeUsePD); and (3) processing is necessary for the performance of a contract to which you are a party.

**Compliance with Law, Internal Regulations and Protection**

This includes processing Personal Data to: compliance with law or legal process, Lincoln Electric's policies and procedures and to protect the rights, property, or safety of Lincoln Electric, our users, or others.

Legal Bases: The processing is justified based on statutory provisions that (1) Lincoln Electric is required to comply with a legal or statutory obligation in the EU or a Member State; (2) to protect the vital interests of the data subject or of another natural person; and (3) processing is necessary for Lincoln Electric’s legitimate interests as set out [herein](#WhatPersonalDataWeCollectAndHowWeUsePD).

**Communication with Site Visitors**

This includes processing Personal Data to: enable visitors to submit an inquiry or comment to Lincoln Electric and reply to such inquiries.

Legal Bases: The processing is justified based on statutory provisions that processing is necessary for Lincoln Electric’s legitimate interests as set out [herein](#WhatPersonalDataWeCollectAndHowWeUsePD).

**Corporate Transactions**

This includes processing Personal Data to: comply with requests of prospective purchasers interested in Lincoln Electric or its assets.

Legal Bases: The processing is justified based on (1) your consent; and (2) processing is necessary for Lincoln Electric’s legitimate interests as set out [herein](#WhatPersonalDataWeCollectAndHowWeUsePD).

**Direct Marketing**

This includes processing Personal Data to: provide (e-)newsletters and other marketing materials.

Legal Bases: The processing is justified based on (1) your consent; (2) processing is necessary for Lincoln Electric’s legitimate interests as set out [herein](#WhatPersonalDataWeCollectAndHowWeUsePD).

**Warranty and Registration**

This includes processing Personal Data to: provide product registration and extended warranty orders.

Legal Bases: The processing is justified based on based on statutory provisions that (1) processing is necessary for the performance of a contract to which you are a party; (2) processing is necessary for Lincoln Electric’s legitimate interests as set out [herein](#WhatPersonalDataWeCollectAndHowWeUsePD); and (3) Lincoln Electric is required to comply with a legal or statutory obligation in the EU or a Member State.

**With whom do we share your Personal Data?**

Personal data are shared within the Lincoln Electric (i.e. intra-group) or with third parties. In some cases, external companies collect Personal Data directly from you on our behalf.

The categories of recipients of Personal Data are listed [here](#WhatPersonalDataWeCollectAndHowWeUsePD).

**Do we disclose your Personal Data internationally?**

**Intra-Group**

Due to the global nature of our operations, some of the recipients mentioned [herein](#HowWeSharePD) may be located in countries outside the European Economic Area (EEA), which do not provide an adequate level of data protection by law. International transfers will be to countries where Lincoln Electric entities have offices, including the United States of America, Canada, Mexico, Argentina, Brazil, Colombia, Venezuela, Russia, Ukraine, Australia, China, India, and Japan. The transfer of your Personal Data outside the EEA takes place on the basis of our Global Intra-Group Data Transfer and Processing Agreement, which is based on [standard contractual clauses adopted by the European Commission](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en) to protect the Personal Data when transferred outside the EEA and in accordance with applicable law.

**Third Parties**

Some of the third parties with whom we share Personal Data are also located outside the EEA. Certain third countries have been officially recognized by the European Commission as providing an adequate level of protection. You can find the list of these countries at the following address: [*https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\_en*](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en). Transfers to third parties located in other third countries outside the EEA take place using an acceptable data transfer mechanism, such as the Privacy Shield for transfers to self-certified US organizations, the EU Standard Contractual Clauses, Binding Corporate Rules, approved Codes of Conduct and Certifications or in exceptional circumstances on the basis of permissible statutory derogations.

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

**How long does Lincoln Electric keep my Personal Data?**

To find out more about Lincoln Electric’s retention of your Personal Data, click [here](#DataRetention).

**Rights in relation to your Personal Data**

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

**Access**

You have the right to obtain from us confirmation if Personal Data are being processed, the purpose of processing, the categories of data, the legal basis of the processing, information on recipients of the data and the non-EU countries in which they are located, the safeguards put in place for the transfer of data to non-EU countries, the storage period of data or criteria to determine it, further information on your rights, our processing activities, the sources of information and the significant and envisaged consequences of processing.

**Rectification**

You have the right to request the rectification of inaccurate Personal Data and to have incomplete data completed.

**Objection**

You have the right to object to the processing of your Personal Data for compelling and legitimate reasons relating to your particular situation, except in cases where legal provisions expressly provide for that processing. In addition, you have the right to object at any time where your Personal Data are processed for direct marketing purposes.

**Portability**

You may receive your Personal Data that you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit them to other data controllers without hindrance. This right only exists if the processing is based on your consent or a contract and the processing is carried out by automated means.

**Restriction**

You may request to restrict processing of your Personal Data if (i) you contest the accuracy of them – for the period we need to verify your request; (ii) the processing is unlawful and you oppose the erasure of them and request restriction instead; (iii) we no longer need them, but you tell us you need them to establish, exercise or defend a legal claim; or (iv) you object to processing based on public or legitimate interest – for the period we need to verify your request.

**Erasure**

You may request to erase your Personal Data if they are no longer necessary for the purposes for which we have collected them, you have withdrawn your consent and no other legal ground for the processing exists, you objected and no overriding legitimate grounds for the processing exist, the processing is unlawful, or erasure is required to comply with a legal obligation.

**Right to lodge a complaint**

You also have the right to lodge a complaint with a supervisory authority, in particular in the EU Member State of your residence, place of employment, or the location where the issue that is the subject of the complaint occurred.

**Right to refuse or withdraw consent**

Please note that in case we ask for your consent to certain processing, you are free to refuse to give consent and you can withdraw your consent at any time without any adverse negative consequences. The lawfulness of any processing of your Personal Data that occurred prior to the withdrawal of your consent will not be affected.

**Contact Details**

To find out more about how to contact Lincoln Electric, click [here](#ContactingUs).

If you wish to exercise any of the afore-mentioned rights or if you have any questions regarding this Privacy Policy, you may direct your request to

[Insert Address and e-mail address of the relevant controller(s)]

or to our Data Protection and Privacy Coordinator at:

Lincoln Electric Europe

25, Boulevard de la Paix / 95895 Cergy-Saint Christophe Cedex /France

E-mail address: privacy@lincolnelectric.com