

# Data Subject Request Form (under the CCPA)

Please note that neither Employees, Applicants, nor Business-to-Business Contacts when acting as an Owner, Director, Contractor, Employee or Officer (except for opt-out sale rights) are granted any of the data subject request rights under the CCPA.

Accelleron is fully committed to upholding the rights data subjects are granted under the applicable data protection laws and taking great care of their personal data. If you feel that you wish to contact Accelleron and access or delete your personal information or opt-out of the sale of personal information, please complete the form below and follow the instructions shown.

## About you

(if you are an agent requesting this information on a California Consumer's behalf please see below)

* First name:	
* Last name:	
Previous name (if any):	
* Nationality:	

## Your address that you believe Accelleron might have

Address line 1:	
Address line 2:	
City/town:	
Zip/postal code:	
State:	
* County	
* Current email address:	
Previous email address (if any):	

## How are you connected to Accelleron?

Note: Where 'Accelleron' is mentioned in the statements below, this includes all Accelleron Group Companies, acquisitions and subsidiary businesses doing business in California.

Can you please describe what is your relationship with Accelleron in order to efficiently process your request:

- Member of the public that has subscribed to an Accelleron service or newsletter.
- Customer who purchased Accelleron products (not an entrepreneur)
- Other as described below

## What do you need us to do?

Please select what you are requesting:

- I wish to view my personal information which Accelleron holds:
  - Categories of personal information that Accelleron has collected
  - Business or commercial purpose for collecting such personal information
  - Categories of sources from which the personal information is collected
  - Categories of sources from which the personal information is collected
  - Categories of personal information that Accelleron has disclosed for a business purpose
  - Categories of 3<sup>rd</sup> parties with whom Accelleron discloses such personal information
  - The specific pieces of personal information that Accelleron has collected
- I wish to be deleted from Accelleron records
- I wish to opt-out of sale of information\*

\* Please note that Accelleron currently does not sell any of your personal information.

Can you please describe what you need in the simplest way you can:

If you are an agent requesting this information on a California Consumer's behalf, please provide the following information about your authority as the requesting party to be making the request:

Are you the Consumer mentioned above?  Yes  No

If you answered "No" to the question above, please complete the following. Note, if you are not the Consumer, you will need to provide the Consumer's written authorization or appropriate legal authorization to act on the Consumer's behalf.

Full name of the requesting party:	
Requesting party's home address:	
Requesting party's mobile phone number:	
Requesting party's home phone number:	
Requesting party's email address:	
Requesting party's relationship to the Consumer:	
Form of Authorization:	

## What happens next

Please then send this completed form (attached to an e-mail) to [privacy@accelleron-industries.com](mailto:privacy@accelleron-industries.com) from the e-mail account you have specified above.

Depending on the class of Consumer Request and the type of Request, Accelleron will verify your identity in order to properly complete the Request. This may require Accelleron to request additional information (e.g. utility invoice or other similar type of identification documentation) in order to properly complete the Request using possibly two or three factor analysis.

Accelleron will not make changes to any personal data unless we are sure that we are taking instructions from the owner of the personal data.

## If submitting an identification document, please do the following:

Please remove the identity document number and photograph from the copy. This should be done by making a copy of the identity document then redacting these two items, before making a copy to send to us. You should also obscure any other identifier(s) that should be removed when providing a copy to a third party (according to the laws of the country that issued the identity document).

Accelleron will respond to you to within 10 days confirming that we can accept your requested changes. You will receive further communications from [privacy@accelleron-industries.com](mailto:privacy@accelleron-industries.com) as your requested changes are made.

By submitting this Request, Consumer, under penalty of perjury confirms that he/she is the Consumer whose personal information is the subject of this Request.

## Privacy Notice

### 1. Introduction

This Privacy Notice ("Notice") applies to the Accelleron Group of companies, which means Turbo Systems Switzerland Ltd, Switzerland and each entity in which Turbo Systems Switzerland Ltd, Switzerland, directly or indirectly, has a majority holding or owns or controls the majority of voting rights. The Accelleron company that is identified as Controller (referred to as "Accelleron" or "we"), is responsible for the processing of your personal data and controls how it is used, in accordance with this Notice. At Accelleron, respecting your data protection rights is a top priority. This Notice explains how we use personal data about you, how we process such data, and what rights you have regarding your personal data.

### 2. Who is responsible for the processing of your personal data?

Turbo Systems Switzerland Ltd and its subsidiary companies are responsible for your personal data. For applicable privacy and data protection laws, the primary controllers of your data are the Accelleron subsidiary companies to which you submit your request – as indicated in the "Additional details to your request" field. In absence of such data, all subsidiary companies established in the country to which you address your request will act as the controllers of your personal data.

Other subsidiary companies of Accelleron as listed in the Section "6. Parties we share your personal data with (in and outside the EU and EEA or outside the country where the Accelleron company that controls your data is located)" may also receive and process your personal data, either in the capacity of controller or processor and this Notice applies equally to them.

### 3. The types of information we collect and use?

We process all categories of personal data relevant for the type of request the following categories of personal data, including:

- **Basic identification and contact data submitted in the request or further correspondence** such as your first and last name, country of residence, type of your relationship with Accelleron, e-mail, personal or business telephone number and scanned copy of a document which enable us to confirm your identity;
- **All other data categories relevant to your request** such as the data you want to receive a copy of or to have deleted, including the data you provide in the "Additional details to your request" field.

Providing your first name, last name, e-mail, country of residence, scanned copy of a document which enable us to confirm your identity and type of relationship with Accelleron is mandatory to submit a request. Providing other data categories is not mandatory to submit the request but may impact the its assessment and execution. For this purpose, we may ask you to provide additional categories of personal data, if this is necessary to respond to your inquiry.

In order to assess and execute your request, we may process your personal data obtained from third parties and publicly accessible sources. In such case you can find exact information regarding the source of your data in relevant privacy notice or request such data via [www.accelleron-industries.com/privacy](http://www.accelleron-industries.com/privacy).

## 4. Why we use your personal data?

We use your personal data as described above to assess your request and to fulfill it, in case it has been deemed justified.

After completing your request, we may still process your personal data to prove controllers compliance with obligatory regulations or to properly assess and respond to any complaint. For statistical purposes, improvement of our services and testing of our IT systems we use as much as reasonably possible anonymized data. This means that these data can no longer (in)directly identify you or single you out as an individual.

## 5. The legal basis we rely on

We use your personal data for the purposes described in this notice based on one of the following legal bases, as applicable:

- we process your personal data on the basis of legal requirements, to fulfill our legal obligations resulting from the California Consumer Privacy Act of 2018 ("CCPA") and the regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) and other legal acts relevant for the subsidiary company, to which the request has been submitted;
- In some cases, we also rely on our **legitimate interests** to process your personal data insofar as this is not overridden by your own privacy interests. Such interests may include:
  - executing data subject requests in scope required by the Accelleron internal policies;
  - monitoring and proving controllers compliance with binding regulations and internal company policies in scope of personal data protection;
  - assessing and responding to complaints and requests related to your request;
  - transmitting personal data within the Accelleron group for internal administrative purposes as necessary, for example to provide centralized services.

You may obtain a copy of our assessment of why we may process your personal data for these interests by visiting [www.acceleron-industries.com/privacy](http://www.acceleron-industries.com/privacy).

With regard to personal data concerning criminal convictions and offences, we will only process such data where such processing is permitted by national law permitting such processing.

## 6. Parties we share your personal data with

(in and outside the EU and EEA or outside the country where the Accelleron company that controls your data is located)

We only share your personal data with other Accelleron affiliates or third parties as necessary for the purposes described in the table below. Where we share your personal data with an affiliate or third party so that it is transferred to or becomes accessible from outside the European Union ("EU") and the European Economic Area ("EEA") or outside the country where the Accelleron company that controls your data is located, we always put adequate safeguards in place to protect your personal data. Examples of these safeguards are an adequacy decision of the European Commission ([read more here](#)), Standard Contractual Clauses ([read more here](#)) and the Binding Corporate Rules that some of our suppliers have adopted. We have taken additional measures for the transfer of data from within to outside the EU, EEA and outside the country where the Accelleron company that controls your data is located to protect your personal data.

If you would like an overview of the safeguards which are in place, please submit a request at [www.acceleron-industries.com/privacy](http://www.acceleron-industries.com/privacy).

Recipient Category	Recipient Location	Purpose
Accelleron affiliates and subsidiaries	See the list of <a href="#">Accelleron subsidiaries</a>	To assess and coordinate execution of your request
Service providers such as IT services and professional and advisory services including accountants, auditors, lawyers and other advisors or service providers working on Accelleron's behalf	Countries of European Union, European Economic Area and other relevant countries	To facilitate executing your request (whenever Accelleron transferred relevant personal data to external entities), obtain necessary technical support or receive external specialist advice
Recipients as required by applicable law or legal process, to law enforcement or government authorities, etc.	Countries of European Union, European Economic Area and other relevant countries	Where required by applicable law or a legitimate request by government authorities, or a valid legal requirement

## 7. How long we keep your personal data

Based on mandatory legislation, Accelleron must keep certain personal data for a minimum period of time. We only keep your personal data for as long as necessary for the purposes described in this privacy notice. In general, we will process your personal data for 2 years from the date of the request submission.

At the same time, applicable data protection laws require that we do not keep personal data in an identifiable form for any longer than is necessary for the purpose for which the personal data is being processed. Through the setting of IT applications and policies we ensure that our keeping of your personal data is deleted when we no longer need it.

Personal data related to you, which were not deleted or changed as a result of your request can still be processed for the purpose for which they have been initially collected.

For more information regarding specific retention periods that apply to your personal data, please submit a request at [www.acceleron-industries.com/privacy](http://www.acceleron-industries.com/privacy).

## 8. Your data privacy rights

Depending on the jurisdiction in which you are located and in which your personal data is processed, you may have the following rights:

Data Privacy Rights	What it means
The right to access your data	You are entitled to ask Accelleron for an overview of or to obtain a copy of the personal data we hold about you.
The right to have your data corrected	You may request immediate correction of inaccurate or incomplete personal data we hold about you.
The right to have your data erased	You may request that personal data be erased when it is no longer needed, where applicable law obliges us to delete the data or the processing of it is unlawful.
The right to restrict data processing	You have the right to restrict the processing of your personal data in specific circumstances.

The right to data portability	You have the right to receive your personal data in a structured, machine-readable format for your own purposes, or to request us to transfer it to a third party.
The right to object to data processing	You have the right to object to our processing of your personal where we rely on our legitimate interests as the basis for our processing, where your data protection rights outweigh our reasoning for legitimate interests.
The right to withdraw consent	Where Accelleron has asked for your consent to process personal data, you may withdraw your consent at any time. The withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.

Please note that the rights described above are not absolute, and that your request cannot always be met entirely. For example, sometimes we cannot delete or restrict the processing of your personal data as we may have legal obligations or contractual obligations to keep certain such personal data. You may request to enforce your data privacy rights at [www.acceleron-industries.com/privacy](http://www.acceleron-industries.com/privacy).

## 9. Contact and further information

If you want to access your personal data, make use of any of your other rights mentioned above or if you have any questions or concerns about how Accelleron processes your personal data, please contact our Group Data Protection Officer at [privacy@acceleron-industries.com](mailto:privacy@acceleron-industries.com), or submit your complaint at [www.acceleron-industries.com/privacy](http://www.acceleron-industries.com/privacy). Should you not be satisfied with our response or believe we are processing your personal data against the law, you may also have the right to file a complaint with the Data Privacy Authority in your country of residence or work, or seek a remedy through the courts where you believe an infringement of data privacy laws may have taken place.