

## TEXTRON FINANCIAL CORPORATION PRIVACY STATEMENT FOR CUSTOMERS AND POTENTIAL CUSTOMERS

IMPORTANT INFORMATION REGARDING PROTECTION OF YOUR PERSONAL INFORMATION, PLEASE READ AND AGREE TO THE TERMS AND CONDITIONS DESCRIBED IN THIS PRIVACY POLICY BEFORE SHARING ANY PERSONAL INFORMATION OR CREATING A PROFILE.

At Textron Financial Corporation (“Textron Financial”), we care about the protection of your personal data. Because we care, we have adopted the practices described in this Privacy Statement for Customers and Potential Customers. You should carefully read this Privacy Statement and agree to the terms and conditions described in it.

### **Privacy Statement for Customers and Potential Customers**

Textron Financial and its subsidiaries and affiliated businesses respect the privacy of our customers and are committed to complying with applicable privacy laws in every country in which we operate. This Privacy Policy for Customers and Potential Customers is intended to inform you about how personally identifiable information you submit to Textron Financial (“Personally Identifiable Information”) directly, via our website, or through one of our representatives will be handled and protected by Textron Financial.

## **Our Collection and Use of Personally Identifiable Information**

### **Personally Identifiable Information We Collect**

Textron Financial may collect information about you or your company as a customer or potential customer. You may be asked to provide Textron Financial with information about you or your business and its capabilities together with certain Personally Identifiable Information.

Personally Identifiable Information includes, but is not limited to the following:

- **Personal details:** given names; preferred names; nicknames; gender; date of birth; age; marital status; social security number; passport number; other government-issued numbers (tax identification number, green-card numbers; driving-license numbers; nationality/citizenship; images of passports, driving

licenses, and signatures; authentication data (passwords); photographs; visual images; and personal appearance.

- **Family details:** names and contact details of family members and dependents.
- **Contact details:** address; telephone number; email address; and social-media profile details.
- **Employment details:** industry; role; business activities; names of current and former employers and business partners; work address; work telephone number; work email address; and work-related social-media profile details.
- **Education and aviation history:** details of your education and qualifications and aviation or other relevant industry experience.
- **Financial details:** billing address; bank account numbers and balances; income sources, investments; loan history; account holder name and details; credit history; instruction records; transaction details; and counterparty details, or related information pertaining to your application as a guarantor.
- **Views and opinions:** any views and opinions that you choose to send to us or publish about us (including on social-media platforms).
- **Electronic Identifying Data:** IP addresses; cookies; activity logs; online identifiers; unique device identifiers; and geolocation data.

### **Sensitive Personal Data**

Sensitive Personal Data is Personally Identifiable Information about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, or any other information that may be deemed to be sensitive under applicable law.

### **Processing your Sensitive Personal Data**

We do not seek to collect or otherwise Process your Sensitive Personal Data, except where:

- the Processing is necessary for compliance with a legal obligation (e.g., to comply with our diversity reporting obligations, tax-reporting requirements, etc.);

- the Processing is necessary for the detection or prevention of crime (including the prevention of fraud) to the extent permitted by applicable law;
- you have manifestly made those Sensitive Personal Data public;
- the Processing is necessary for the establishment, exercise, or defense of legal rights;
- we have, in accordance with applicable law, obtained your explicit consent prior to Processing your Sensitive Personal Data (as above, this legal basis is only used in relation to Processing that is entirely voluntary—it is not used for Processing that is obligatory in any way); or
- processing is necessary for reasons of substantial public interest and occurs under an applicable law that is proportionate to the aim pursued and provides for suitable and specific measures to safeguard your fundamental rights and interests.

Textron Financial may collect and store the Personally Identifiable Information that you provide to us. That data may be stored on third-party servers located in the United States.

**Retention and Deletion of Your Personally Identifiable Information:** Personal data collected will only be retained as long as necessary for business continuity or valid legal purposes.

**How We Use the Personally Identifiable Information We Collect**

The Personally Identifiable Information that you provide will be used for specific purposes including:

Processing purpose
<b>AML/KYC:</b> fulfilling our regulatory compliance obligations, including anti-money-laundering and 'Know Your Customer' diligence; and confirming and verifying your identity (including by using credit-reference agencies); and screening against government, supranational bodies (including, but not limited to, the European Union and the United Nations Security Council) and/or law enforcement agency sanctions lists as well as other legal restrictions.
<b>New-customer review:</b> learning about new customers; and compliance with our internal compliance requirements, lending, underwriting, or other policies and procedures.
<b>Credit worthiness:</b> conducting credit-reference checks and other financial due diligence.
<b>Providing products and services to you:</b> administering relationships and related services; performance of tasks necessary to provide requested services; and communicating with you in relation to those services.

**Marketing / Prospecting:** communicating with you via any means (including email, telephone, text message, social-media post, mobile app, or in person) subject to ensuring that such communications are provided to you in compliance with applicable law; and maintaining and updating your contact information where appropriate.

**IT operations:** management of our communications systems; operation of IT security; and IT security audits.

**Financial management:** sales; finance; corporate audit; and vendor management.

**Investigations:** detecting, investigating, and preventing breaches of policy and criminal offences, in accordance with applicable law.

**Legal compliance:** compliance with our legal and regulatory obligations under applicable law (including responding to lawful demands for data).

**Legal proceedings:** establishing, exercising, and defending legal rights, including collecting sums you owe to us or retrieving collateral.

**Risk Management:** audit, compliance, controls, and other risk management.

**Fraud prevention:** detecting, preventing, and investigating fraud.

## International Data Transfers

As of May 25, 2018, the General Data Protection Regulation (Regulation (EU) 2016/679) is effective. Like other data privacy and protection regulations, this provides, among other things, extended information obligations for those responsible for data privacy. Therefore, Textron Financial will inform you—in compliance with the applicable legal regulations—about the processing of your personal data. Accordingly, Personal Data about customers may be transferred and processed in the U.S. and other countries that may not be deemed to provide the same level of data protection as your home country. Textron Financial maintains and applies data-protection standards consistent with those specified in this Notice. As part of its commitment to privacy, Textron Financial adheres to strict data-privacy principles to protect personal data. With respect to information about customers, Textron Financial complies with all applicable national and local data protection laws. In addition, Textron Financial has committed to Inter-Company Data Processing Agreements based on the EU Model Contracts (“Model Contracts” (also known as the Standard Contractual Clauses)), to authorize worldwide transfer, and subsequent sub-Processing, of Personal Data throughout the global business network of our parent company, Textron Inc.

## **Disclosures of Your Personally Identifiable Information**

We are not in the business of selling your Personally Identifiable Information to others.

Access to your Personally Identifiable Information will be restricted to Textron Financial staff and designated third-party agents who have a need to know the specific information in question in order to carry out their responsibilities with regard to Textron Financial's business. Your information may also be disclosed to governmental entities pursuant to and in compliance with applicable laws and regulations, or a subpoena or court order.

We do not reveal Personally Identifiable Information about you to unaffiliated third parties, unless:

- (1) you request or authorize it;
- (2) the information is provided to help complete a transaction for you;
- (3) the information is provided to comply with the law, applicable regulations, court orders or subpoenas, to enforce our Terms of Use or other agreements, or to protect our rights, property or safety or the rights, property or safety of our users or others (e.g., to a consumer reporting agency for fraud protection etc.); or
- (4) the disclosure is done as part of a purchase, transfer or sale of services or assets (e.g., where substantially all of the assets of an applicable Textron Financial business are acquired by another party).

We may also gather aggregated data about you and disclose such aggregated (but not personally identifiable) information to third parties for analysis or other purposes.

## **Your Rights to the Information We Collect**

- This Privacy Notice is intended to provide you with information about what personal data Textron Financial collects about you and how it is used. If you have any questions, please contact us: [ensuringcompliance@textronfinancial.com](mailto:ensuringcompliance@textronfinancial.com).
- If you wish to confirm that Textron Financial is processing your personal data, or to have access to the personal data that Textron Financial may have about you, please contact us: [ensuringcompliance@textronfinancial.com](mailto:ensuringcompliance@textronfinancial.com)

- You may also request information about: the purpose of the processing; the categories of personal data concerned; what the source of the information was (if you didn't provide it directly to Textron Financial); and how long it will be stored. You have a right to correct (rectify) the record of your personal data maintained by Textron Financial if it is inaccurate. You may request that Textron Financial erase that data or cease processing it, subject to certain exceptions. You may also request that Textron Financial cease using your data for direct marketing purposes. When technically feasible, Textron Financial will—at your request—provide your personal data to you or transmit it directly to another controller.
- Reasonable access to your personal data will be provided at no cost upon request made to Textron Financial at [ensuringcompliance@textronfinancial.com](mailto:ensuringcompliance@textronfinancial.com). If access cannot be provided within a reasonable time frame, Textron Financial will provide you with a date when the information will be provided. If for some reason access is denied, Textron Financial will provide an explanation as to why access has been denied.

### **Safeguards**

Textron Financial uses reasonable administrative, technical, personnel, and physical measures to safeguard your Personally Identifiable Information against loss, theft, and unauthorized use or modification. We update and test our security technology on an ongoing basis.

Textron Financial has obtained assurances from its third-party agents that they have similar practices in place.

### **No Contract**

This Privacy Statement does not constitute a contract between Textron Financial and any customer or potential customer

### **Changes to This Policy**

As our business changes, this Privacy Policy for Customers or Potential Customers is expected to change from time to time, and we reserve the right to change it at any time. The use of your information is subject to the Privacy Policy for Customers or Potential Customers in effect at the time of use. The provisions contained herein supersede all previous notices or statements regarding our privacy practices with

respect to this Site. We may email periodic reminders of our notices and terms and conditions and post any changes to the Privacy Policy for Customers or Potential Customers to our website. We encourage you to check our website frequently to see the current privacy statement in effect and any changes that may have been made to it.

### **Website Terms of Use**

In addition to the Privacy statement above, your use of our website is also governed by the Textron Financial website [Terms of Use](#). By using the website and submitting any information to it, you agree to abide by those Terms of Use as published.

### **HOW TO CONTACT US WITH QUESTIONS ABOUT THIS POLICY**

To contact us regarding any questions about this Policy or to register a complaint with Textron Financial or a data-protection authority, please contact us at [ensuringcompliance@textronfinancial.com](mailto:ensuringcompliance@textronfinancial.com).

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