

## IMI Process Automation Global Privacy Notice

IMI Critical Engr PBM LLC, together with other members of the IMI Process Automation Group (“IMI Process Automation”, “we” “us”. “our”), is committed to safeguarding the privacy of your personal information (see s1 below). IMI Critical Engr PBM LLC and other members of the IMI Process Automation Group are subsidiaries of IMI plc. This Privacy Notice is issued on behalf of IMI Process Automation so when we mention “IMI Process Automation”, “we”, “us” and “our” in this Privacy Notice, we are referring to the relevant company within IMI Process Automation responsible for processing your personal data. IMI Critical Engr PBM LLC is the controller and responsible for <https://www.pbmvalve.com/>.

This Privacy Notice contains important information about how we may process (i.e., collect, store, use, delete etc.) your personal information including when you visit IMI Process Automation websites (“Sites”) or use IMI Process Automation mobile application (“App”)]; as well as when we interact with you offline or on shared platforms (e.g. when selling / buying products or services, visiting IMI Process Automation premises or otherwise interacting with us (e.g. at conferences and exhibitions or on online forums such as LinkedIn).

This Privacy Notice may not cover full details of all processing by IMI Process Automation. Job candidates/applicants should consider [Candidate Privacy Notice](#).

California residents should also review the California Privacy Supplement for specific information about how their data is processed.

### 1. What personal information do we process?

For purposes of this Privacy Notice, “personal information” refers to any information relating to an identified or identifiable natural person that we maintain in an accessible form.

We may process the following information about you which identifies you (e.g, contact details) or which can be used to identify you e.g., that can be linked with other information):

- *Professional or investor information you provide* - for example, by subscribing to newsletters, completing forms, creating a customer account on one of our Sites, and when attending events, webinars, or conferences (including videoconferences) and meetings. This may include your name, address, email address, telephone number, customer number, company details, business card information, video and audio recordings, and details of your employer or companies you are associated with.
- *Information we obtain about you from third parties or from the public domain for our business purposes and to protect our legal interest* - for example, data If you engage in business with IMI Process Automation (for example, as a supplier, agent, distributor, customer, or client), we may process information to safeguard IMI Process Automation’s interests and comply with legal obligations. The information that may be processed includes nationality, ethnicity, identity documentation (such as driving licenses and passports), details about transactions, suspected fraud, offenses, suspicious transactions, professional and political information (including being

on sanctions lists), and information included in whistleblowing reports that contain personal information.

- *Information we obtain about you from third parties or from the public domain for our sales and marketing purposes* – we may also obtain information about you from event sponsors, or from trade conferences, publications, where you interact with us on social media sites or professional contact sites such as LinkedIn.
- *Information captured when you visit our physical sites* – for example, CCTV footage and visitors’ sign-in information (which may include biometric data where this complies with applicable laws) access information.
- *Information in correspondence and reports* –we may keep a record of correspondence between you and IMI Process Automation, including images, recordings, and correspondence submitted through the website, and any Apps.
- *Information needed to prevent fraud, manage risks, investigate whistleblowing reports and meet “know-your-customer” and other compliance laws* - if you engage in business with IMI Process Automation (e.g. as a supplier, agent, distributor or customer etc.) we may process information to protect IMI Process Automation’s interests and comply with legal requirements. The information that may be processed includes nationality and ethnicity, identity documentation, such as driving licences and passports, details about transactions, suspected fraud, offences, suspicious transactions, professional and political information (including being on sanctions lists) and information included in whistleblowing reports that contain your personal information.
- *Sales, marketing and transactions information* - details of quotations, negotiations, transactions carried out through our Sites or through other channels and for the fulfilment of your orders. Where transactions are made on our Sites, we use third-party service providers to process your payments.
- *Your comments* - any personal information you may provide to us via comments on our Sites, on social media sites or while using online chatbot functionality or by using our App.
- *Survey and feedback information* - we may use your contact information to request that you complete surveys or provide us feedback and will process any responses provided; and
- *Website and communication usage* - details of your visits to the Sites and App and information collected through cookies and other tracking technologies, including but not limited to your IP address (a unique identifier for your computer or other device) and domain name, your browser version and operating system, traffic data, precise or general location data, web logs and other communication data and the resources that you access. For more information on our use of cookies and tracking technologies, please visit our Cookie Notice.

## 2. How do we use personal information?

In this section, we set out the purposes for which we use and share personal information that we collect. If you are in a country in the European Economic Area (EEA) or in the United Kingdom, in compliance with our obligations under applicable law, we also identify the “legal bases” on which we rely to process the information.

Purpose	Details	Legal Basis
Providing our products and services	We will need your personal information to provide our products and administer our services effectively, including to provide you	Contract performance, legitimate interests (to enable us to perform our

	with information services and products that you have requested (e.g., a catalogue), to create and run your user sales account, to process your order and carry out our obligations arising from any contracts entered into between you and us and to provide support and after-sales services to you, including but not limited to administering return or refund policies. This may include passing your data to third parties such as agents, business partners, group companies, contractors or to our advisors (e.g. legal, financial, business or other advisors).	obligations and provide our products and services to you).
Improving our products and services	We may collect your personal information for improving our products and services including training of AI components, for purposes of internal training, quality control and research and development. This may include passing your personal information to third parties such as business partners, suppliers and/or service providers. Where possible we will aggregate and/or anonymise your personal information when using for such purposes.	Legitimate interests (to enable us to improve our products and services).
Obtaining feedback	We may occasionally contact you to invite you to provide feedback on our products and services, or to assess your product and services needs as a part of our innovation and research and development practices.	Legitimate interests (to enable us to gather feedback and improve products and services).
Ensuring Site and App content is relevant	We may use your personal information to analyse how you use our Sites and App, and to ensure that the content, services and advertising that we offer are tailored to your needs and interests and to provide you with suggested local distributors who stock products that you are interested in, which may include passing your personal information to third parties such as business partners, suppliers and/or service providers. We may also aggregate and/or anonymise your personal information for such purposes.	Legitimate interests (to allow us to provide you with the content and services on the Sites and App).
Conducting compliance checks and reporting	If you or an entity you are related to seeks to do business with IMI Process Automation, places an order and/or opens a sales account with us then we will use your personal information for trade screening against international restricted and denied parties lists and as required by applicable law, regulation and best practice at any given time. If false or inaccurate information is provided and fraud is identified or	Legal obligations, legitimate interests (to ensure that your organisation falls within our acceptable risk profile and to assist with the prevention of crime and fraud and to protect IMI Process Automation and its

	<p>suspected, details may be passed to fraud prevention agencies and may be recorded by us or by them. Information about you may also be included if you make a report, or your information is included by another individual, in a report made via our whistleblowing hotline.</p>	<p>employees). Where this includes special categories of personal information, we will usually rely on substantial public interests (processing for the prevention and detection of fraud/crime), or very rarely where necessary, explicit consent.</p>
Marketing	<p>We may contact you to provide the latest updates and offers, where you have opted-in for such communication. We may market to you by post, e-mail, SMS or over the telephone. Where required by law, we will ask for your consent at the time we collect your data to conduct any of these types of marketing. We will provide an option to unsubscribe or opt-out of further communication on any electronic marketing communication sent to you or you may opt out by contacting us as set out in section 13 below.</p>	<p>Consent where required or legitimate interest where in compliance with applicable law (to keep you updated with news in relation to our products and services).</p>
Facilitating visits to our physical premises	<p>Where you visit one of our physical sites, we may obtain information about you to facilitate your visit and ensure health and safety of all individuals.</p>	<p>Legal obligations, legitimate interests (to ensure that the safety and security of premises).</p>
Monitoring and quality control	<p>For quality control and training purposes, we may monitor or record your calls with us and any "online chat" service (when this is available). When you use any online chat function, we will collect your name, email address and chat logs.</p>	<p>Legal obligations, legal claims, legitimate interests (to ensure the quality of our services).</p>
Allowing you direct interactions	<p>Where we have enabled certain interactive features in our Sites and App such as online chat you may message a member of our staff so that they can answer your queries and provide information in real time. Online chat functionality may be provided by a third party. When you use online chat, third parties may place cookies on your computer to enable the service to work (please see the Cookies Notice for further detail). When you message our staff, we and related third parties will process this information which may include information that you have provided.</p>	<p>Legitimate interests (to allow us to provide you with real-time online advice and support).</p>

Understanding your interactions with content	Where we have (a) provided you with certain email content; or (b) you have forwarded such email content to recipient(s), you and that recipient will have been presented with a message box which informs you that your interaction with such content will be analysed, and requires you and your recipient(s) to consent to such analysis. Where both you and your recipient(s) consent to such analysis, we will be provided with the name(s) and email address(es) of your recipient(s). We collect this information to better understand who you share our content with and how business decisions are made.	Consent (to enable our use of the tracking technology where legally required), legitimate interests (to allow us to understand who our content is shared with).
Informing you of changes and updates	We may use your personal information to notify you about changes and updates to our services and products.	Legitimate interests (to notify you about changes to our service); contract performance.
Reorganising our business	In the event that we are (i) subject to negotiations for the sale of our business or part thereof to a third party, (ii) sold to a third party or (iii) undergo a re-organisation, we may need to transfer some or all of your personal information to the relevant third party (or its advisors) as part of any due diligence process for the purpose of analysing any proposed sale or re-organisation. We may also need to transfer your personal information to that re-organised entity or third party after the sale or reorganisation for them to use for the same purposes as set out in this Privacy Notice.	Legitimate interests (in order to allow us to change our business).
Protecting interests of IMI Process Automation and ensuring legal or regulatory compliance	We may process your personal information to prevent fraud, manage risks, investigate whistleblowing reports, and meet, “know-your-customer”, and other compliance laws and to meet legal obligations and regulatory requirements.	Legal obligations, legal claims, legitimate interests (to protect IMI Process Automation IMI Process Automation and its employees and to cooperate with law enforcement and regulatory authorities).

**3. To whom do we disclose your personal information?**

We may share information internally and externally as permitted under the applicable laws. Disclosures might be made to third-party service providers, contractors, agents and advisors (e.g. legal, financial, business, or other advisors) and other members of the Group that perform essential business activities (such as technology and logistics providers) for and on behalf of IMI Process Automation.

Where we provide personal information to service providers, we shall only disclose what is necessary to deliver the specific service, or as required by law. We take reasonable measures to ensure service providers and data processors keep your information secure and oblige them by contract not to use information for their own purposes.

We may disclose your personal information to third parties, the court service and/or regulators or law enforcement agencies in connection with enquiries, proceedings, or investigations by such parties anywhere in the world where compelled or permitted to do so. Where required by law, we will direct any request to disclose information to law enforcement agencies or other third parties to you or notify you before responding.

#### **4. Where is personal information processed?**

IMI Critical Engr PBM LLC and other members of IMI Process Automation is a subsidiary of IMI plc which is a global company based in United Kingdom. Your personal information may be transferred, accessed, processed or stored in countries around the world. Regardless of location, we will, where necessary, put in place appropriate safeguards including during transfer to ensure your information is adequately protected. This may include encryption where possible. We may store the information we collect in the United States or in other countries where we or our service providers have facilities. We may transfer information to countries outside of your country of residence, including the United States, which may have data protection laws and regulations that differ from those in your country. Where local laws regulate transfer of data, such as in UK, Europe and China, we will comply with such requirements.

Any transfers of information originating from within the European Economic Area (EEA), the United Kingdom, and Switzerland to countries outside the EEA, UK, or Switzerland will normally be made on the basis of the model clauses approved by the European Commission for transfers from EU controllers to non-EU controllers, which may be found at the Commission's website at <https://ec.europa.eu>.

#### **5. How long do we keep your personal information?**

Our retention periods for personal information are based on business needs and applicable legal requirements. We will keep your information for as long as is necessary for the processing purpose(s) for which they were collected and any other permitted linked purpose. For example, we may retain certain transaction details and correspondence until the time limit for claims arising from the transaction has expired, or to comply with regulatory requirements regarding the retention of such data. When we no longer have a purpose for retaining your personal information, we will destroy it and take commercially reasonable measures to make sure that the information is irrecoverable and irreproducible.

#### **6. How are cookies used?**

For detailed information on the cookies we use on <https://www.imiplc.com/candidate-privacy-notice> please see Cookie Notice. Where required by law, you will be provided the option to reject or accept cookies that are not strictly necessary. Other Sites may use additional cookies. Where this occurs, specific information and additional options to reject or accept cookies, that are not strictly necessary, shall be provided on these Sites.

## **7. What about Third-Party Websites?**

Our Sites may contain links to third-party sites which we do not operate or endorse. These websites may use cookies and collect your personal information in accordance with their own privacy policies. This Privacy Notice does not apply to third-party websites, and we are not responsible or liable for third-party websites, their policies, or their processing of your personal information.

## **8. How do we protect your personal information?**

We take appropriate physical, electronic and procedural measures to protect the personal information. However, no data transmission over the internet or Sites can be guaranteed to be secure from intrusion and cannot guarantee absolute security.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Site or Apps, you are responsible for keeping this password confidential, and complying with any other security procedures that we notify you of. Please do not share a password with anyone.

When you are on any third-party website that asks you for confidential information, you should check that the third party is a trusted source and if the information being transmitted is encrypted to increase the security of your information. Keep in mind that there is no such thing as perfect security.

## **9. What rights do individuals have?**

Depending on the jurisdiction in which you are located, you have certain rights with respect to your personal information. If you wish to exercise your legal rights, please contact us as set out in section 13 below. We will process your request in accordance with any applicable legal requirements.

## **10. Marketing**

Individuals have the right to ask us not to process personal information for direct marketing purposes. Where legally required, we will inform you if we intend to use your personal information for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by not checking certain boxes on the forms we use to collect your personal information. You can also exercise the right at any time by contacting us as set out in section 13 below.

## **11. Updating information**

We will use reasonable endeavours to ensure that your personal information is accurate. To assist us with this, please notify us of any changes to the personal information that you have provided to us by contacting us as set out in section 13 below.

## **12. Additional Rights for Individuals**

Many laws provide specific rights to individuals, including: countries in EEA UK, Switzerland, Mexico, Brazil, South Korea, Japan, China, Singapore, Australia and California, USA. California residents please see the applicable California Privacy Supplement for further details about your rights.

Depending on the specific laws that apply you may have the right to request that we:

- provide you with further details on the use we make of your personal information, including about types of entities to whom data is disclosed;
- provide you with a copy of personal information that you have provided to us;
- update any inaccuracies in the personal information we hold (please see section 11 above);
- delete any personal information that we no longer have a lawful ground to use;
- (where processing is based on consent), stop particular processing where you withdraw your consent (see above for marketing). Please note that if you withdraw your consent, we may not be able to provide a particular service or content to you;
- transmit certain personal information (that you have provided to us) to a third party electronically;
- erase personal data following withdrawal of consent;
- anonymize or restrict / eliminate unnecessary, excessive or illegal personal data; and
- review any decision based solely on automated processing, including profiling, which affects your interests and to require information about the criteria and the processes.

You may also be able to object to any processing based on legitimate interests' ground unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights and restrict how we use your information whilst a complaint is being investigated.

If you exercise any of these rights, we will check your entitlement, and respond in most cases within a month or as required by law.

### **13. Contact Us**

Where required by local law IMI Process Automation has nominated country Data Protection Officers. To exercise your rights regarding your personal information, or to contact a Data Protection Officer, or if you have questions, please email us at [data.privacy@imiplc.com](mailto:data.privacy@imiplc.com) or Data Privacy c/o Legal Department, IMI plc Lakeside Solihull Parkway Birmingham Business Park Birmingham B37 7XZ.

When you contact us, please indicate in which country and/or state you reside. Please provide as much information as possible to allow us to understand and evaluate your request so that we can substantively respond to you. In some cases, we may need to verify your identity.

If you are not satisfied with our use of your personal information or our response to any exercise of your rights, you have the right to contact the data protection regulator in the country in which you are based including the following:

[EU Data Protection Authorities \(DPAs\)](#)

[Swiss Federal Data Protection and Information Commissioner \(FDPIC\)](#)

[Information Commissioner's Office \(United Kingdom\)](#)

[Brazil, the Autoridade Nacional de Proteção de Dados \(ANPD\)](#)

### **14. Updates to this Privacy Notice**



We may update this Privacy Notice at any time and will include the last updated date and we encourage you to review this Privacy Notice from time to time. Where required by law, we will notify you of changes.

This Privacy Notice was last updated on 12/17/2024.