



Subject: Global Privacy Policy	Department: Dana Worldwide		Approved by: Executive Leadership Team
	Responsible Officer: Chief Compliance Officer	Date of Last Revision/Reivew May 2018	

1. Purpose.

- 1.1 The purpose of this Policy is to set forth Dana Incorporated's ("Dana") commitments regarding the privacy of personal data. This policy is intended to operate in conjunction with Dana Incorporated's Standards of Business Conduct.
- 1.2 Employees employed by a Dana entity established in the European Union shall also refer to the specific Employee Privacy Notice and the Data Subject Rights Policy provided to them in accordance with Regulation (EU) 2016/679 (General Data Protection Regulation), which will prevail over this policy in case of conflict or inconsistency.

2. Administration. This Policy will be administered by Dana's Office of Business Conduct through the direction of the Chief Compliance Officer ("CCO"), who is also the General Counsel. Unless otherwise indicated in a separate policy or notice, the entity responsible for the processing of your personal data is the entity with which you have a contractual relationship.

3. Philosophy. Dana respects the privacy of its employees and Dana email users. We will use our best efforts to maintain personal data as confidential. We will only collect, process, and use personal data for specifically defined purposes, and will collect, process, use and share it only for administrative, legal, information technology system updates, or contractual reasons with other companies who share our commitment to protecting our employees' privacy and data.

4. Collection of Personal Data.

4.1 In order to effectively administer our company and enable the processing of employee information technology systems related to the work environment, job status, employee compensation, benefits and career information, and comply with various legal obligations, it is necessary for Dana to collect personal data. This information will be gathered at the beginning of the employment relationship and additional data may be required throughout the course of an employee's relationship with Dana. Dana may collect names, job titles, contact information, demographic data, cookies, website information and other relevant data to enable Dana to effectively administer the contractual relationship or further commercially reasonable business interests, in accordance with applicable laws.

4.2 It is the responsibility of each employee to assure that the personal data that he or she supplies to the company is accurate and current. If a personal change occurs that affects the accuracy of the data (for example, name change, address, or dependents), it is the responsibility of the employee to assure that his or her personal data are updated in a timely manner. Any Dana email user may choose to restrict the collection of cookie/website data. If required by law, Dana will notify employees of the purposes for which it collects, processes and uses personal data about them.

4.3 Dana does not regularly collect, process, use or share any personal data that may be considered to be sensitive under applicable data protection law. In limited situations, Dana may however collect, process, use or share sensitive data if the employees have provided appropriate consent or if required by law.

5. Notice Regarding Use of Personal Data. Personal data of employees will only be used when necessary to support company global operations and administer Dana's compensation, employee benefits, human resource and similar programs, and when necessary for compliance with legal obligations. When required by local law,



appropriate consent will be sought from employees or Dana email users in the event that Dana intends to process, use or disclose personal data to a third party if the purpose of such processing, use or disclosure is different than described in this policy.

6. Disclosure of Personal Data.

6.1 Dana may disclose personal data to the data recipients described in this Policy.

6.2 Dana may disclose personal data to its majority-controlled subsidiaries and affiliates internationally in accordance with applicable laws.

6.3 Dana may also allow access to systems where personal data are stored to third party contractors for the purposes of providing information technology support services to Dana. When, consistent with this policy, Dana discloses personal data to data processors that are contracted by Dana to process data on behalf of, and in accordance with the instructions of, the company (for example to service providers for the purpose of administering Dana's compensation, training, employee benefit and human resource programs), Dana will implement a data processing agreement compliant with local law to ensure appropriate data protection and data security.

6.4 Further, Dana may disclose your personal data: as permitted or required by applicable law or regulatory requirements; to comply with valid legal processes such as search warrants, subpoenas or court orders; to protect the rights and property of Dana; during emergency situations or where necessary to protect the safety of a person or group of persons; or with your consent where such consent is required by law.

7. Safeguards, Security and Data Integrity. Dana is committed to ensuring that your information is secure. Dana will take appropriate administrative, technical and physical precautions to assure that personal data are protected from loss, misuse and unauthorized access, disclosure, alteration or destruction in accordance with local law requirements. Dana will also not process personal data in a way that is incompatible with the original purposes for which it was collected or purposes subsequently authorized by the employee. Dana will retain personal data for no longer than is necessary for the purposes for which the data were collected or for which they are further processed, unless otherwise provided by law.

8. Access to Personal Data. Subject to legal exceptions, any employee may, upon request, obtain information about their own personal data. Any employee has the right to have any inaccurate data amended or corrected and to have data deleted or blocked in accordance with local law. Any employee may also withdraw any consent previously provided to Dana for the processing of personal data. Any such request should be submitted either to the individual's local human resource manager or to the Office of Business Conduct.

9. Proportionality. Personal data must be relevant for the purposes for which they are to be used. Dana will take reasonable steps to ensure that personal information is used only for the purposes for which it is intended.

10. Concerns.

10.1 In the event that any employee believes that his or her personal data have been handled in a manner inconsistent with this policy, he or she may discuss that matter with his or her supervisor and/or the local data protection officer and/or contact the Dana Ethics and Compliance Helpline. All concerns will be addressed in a manner consistent with this policy and any applicable law. An employee may also, at that point, request that the company cooperate in an independent dispute resolution mechanism to help resolve the dispute.

10.2 If an employee complaint regarding Dana's processing of personal data transferred from the European Economic Area to the United States cannot be resolved through Dana's internal processes, Dana will cooperate with the relevant EEA data protection authority, as appropriate.



Corporate Policy

Adopted: May 2005
Revised: May 2008
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