1. Purpose

This notice provides guidance on how MTS Systems Corporation and its affiliates (“MTS”) communicates information to employees so that employees are aware of how MTS collects, uses, and/or discloses their Personal Data to ensure compliance with local privacy regulations.

1. Scope

The scope of this notice covers MTS employees (“Data Subjects”) residing in North America where such notice is required under local law.

1. Definitions

Personal Data: Any information relating to a Data Subject.

**Data Subject:** An identified or identifiable natural person; 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. This includes for example MTS employees, applicants and contractors. For the purpose of this notice, MTS employees and Data Subjects are used interchangeably.

1. Procedure

This notice is given to MTS employees within North America where required by local law. The Human Resources team, (or other applicable local contact individual), provides this notice to employees during the onboarding process at the time of hire, and the notice is also accessible to all employees on local office sites.

Notice:

1. **Introduction**

This notice describes how MTS collects, uses, and/or discloses the Personal Data of Data Subjects.

1. **Collection of Employee Data**

The types and categories of Personal Data that MTS may collect and process from Data Subjects include:

* Personal and family information, including name and contact information (home address, email address and telephone number), date of birth, birth place, nationality, gender, ethnicity, race, marital or civil status, family status (if applicable), social security number, health insurance identification number, bank information (for deposit of payroll), visa status (if applicable), picture;
* Employment related information, including but not limited to company, hire date, job title, status, user ID and username, position ID, date in position, employee number or ID, region, country, work contact information, division, department, location, employee type, work schedule, cost center, supervisor’s name and employee number, wage and salary information, employee CVs/resumes and related information, employment agreement, training related information, employment history, education history and professional certifications, completion of training programs and reports, performance and talent management information, language skills, and reason for termination (if applicable); and

Electronic information related to the use of MTS information technology, including but not limited to, system log information and reports, user ID and username, e-mail communication, and authentication information such as passwords and tokens.

1. **Use of Employee Personal Data**

MTS will process employee Personal Data for the following purposes:

* Manage and follow-up on workflows;
* Carry out compensation related activities, including stock plan administration and compensation analysis and administration;
* Manage payroll;
* Manage and follow-up on performance;
* Conduct succession planning;
* Manage personnel administration;
* Provide IT security, recovery and helpdesk support services;
* Account for and execute business activities;
* Monitor and enforce adherence with company policies, procedures and standards (including background check screening to validate that the Data Subject is not on a global sanctioned party list); and
* Receive and/or respond to a reported ethics or compliance matter.
1. **Data Recipients**

Limited members of the human resources, finance, legal, export compliance, and IT departments and senior company managers may process employee Personal Data in connection with their job responsibilities and only for the purposes described in Paragraph 3, Use of Employee Personal Data, above.

MTS takes appropriate steps to ensure that:

* such personnel are bound to duties of confidentiality with respect to employee Personal Data; and
* only such personnel having a strict need to access such employee Personal Data are granted access.
1. **Data Retention**

MTS retains Personal Data for legitimate business purposes and to comply with applicable law.

1. **Data Security and Data Integrity**

MTS is committed to collecting and processing employee Personal Data with appropriate care and diligence in compliance with applicable law, including but not limited to using security measures to safeguard data from loss, misuse, unauthorized access, disclosure, alteration, or destruction. MTS also maintains reasonable procedures to help ensure that such data is accurate, complete, current, and reliable for its intended use.

1. **Access**

Employees may access, review and update their own Personal Data in accordance with applicable law. Employees should transmit requests for access to their Personal Data in writing (an email message using a work email address is acceptable) to their local human resources department (or other applicable local contact individual) and/or to the contact identified in Paragraph 11, Contact Information, below. If an employee is aware of changes or inaccuracies in his or her Personal Data of which MTS is not aware, the employee is responsible for informing the local human resources department (or other applicable local contact individual) and/or the contact identified in Paragraph 11, Contact Information, below so that the employee’s Personal Data may be updated or corrected.

1. **Individual Rights**

Where allowed by applicable law, Data Subjects retain the following rights:

(i) The right to access Personal Data relating to them and processed by MTS;

(ii) The right to request the rectification or deletion of any inaccurate or incomplete Personal Data relating to them,

or any Personal Data which is no longer processed for a valid or appropriate purpose;

(iii) The right to object to the processing of their Personal Data at any time, unless such processing is required by applicable law, provided that the Data Subject demonstrates that they have a legitimate ground to object as it pertains to their particular situation;

(iv) The right to request restriction of the processing when the Personal Data is no longer accurate or necessary for a legitimate business interest, the processing is unlawful, or the Data Subject has objected to the processing while the Data Controller verifies the legal basis for the processing; and

(v) The right to receive their Personal Data in a structured, commonly used and machine-readable format, when the Personal Data has been collected with the Data Subject’s consent or as part of a contract and/or business relationship with the Data Controller.

1. **Request or Inquiry Process**

Data Subjects may file an inquiry or request concerning the processing of their Personal Data. The request may be made with the Office of Risk and Compliance by using the contact details made available below in Paragraph 11 Contact Information. The Office of Risk and Compliance will handle the inquiry or request with the assistance of the relevant individuals, without undue delay and no longer than one month after receiving the inquiry or request. To determine whether they can be granted, requests regarding these issues will be evaluated against applicable legal requirements.

1. **Disclosures Required or Permitted by Law**

MTS may disclose or otherwise process employee Personal Data in the context of any sale or transaction involving all or a portion of its business including affiliates, or as may be required or permitted by law.

1. Contact Information

MTS employees may raise questions or issues regarding Personal Data with the Office of Risk and Compliance by using the contact information shown below.

privacy@mts.com

* or -

MTS Systems Corporation

Office of Risk and Compliance
14000 Technology Drive
Eden Prairie, MN 55344

1. Notice Owner

Office of Risk and Compliance

1. Related Policies

ORC-014 Global Privacy & Personal Data Protection

ORC-014.01 Global Data Subject Request Procedure

ORC-015 North America Privacy & Data Protection

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| **REVISION HISTORY** |
| **Rev** | **Description of Change** | **Effective Date** |
| 0 | New | 03/09/2021 |