	CORPORATE POLICY
Policy Title: Global Privacy Policy	Effective Date: December 1, 2018
Author: L. Marino	Function: Legal & Compliance
Approver: M. Gustafsson	Page: 1 of 15

1.0 OVERVIEW

1.1 PURPOSE

ITT Inc. and its operating divisions and subsidiaries¹ (collectively, “ITT,” the “Company,” “we” or “us”) are sensitive to privacy issues, and it is important to us to protect the information provided to us by our Customers, Suppliers and potential, current and former Employees. Accordingly, ITT provides this privacy and information practices policy (“Privacy Policy”) to inform you about our online information practices, the kinds of information we may collect, how we intend to use and share that information, and how you can correct or change or request deletion of such information.


1.2 SCOPE

This Privacy Policy applies to Personal Information that is processed by ITT, including on ITT’s website located at www.ITT.com (together with any and all future websites operated by or on behalf of ITT, the “Site” or “Sites”). All individuals whose responsibilities include the Processing of Personal Information on behalf of ITT are expected to protect that data by adherence to this Privacy Policy.

ITT complies with the requirements of the EU-U.S. Privacy Shield Framework (“Privacy Shield”), as set forth by the U.S. Department of Commerce and the Federal Trade Commission (“FTC”), regarding the collection, use and retention of Personal Information from European Union Member States and European Economic Area member countries, including the Privacy Shield Principles. ITT has certified to the Department of Commerce that it adheres to the Privacy Shield Principles and Supplemental Principles.² If there is any conflict between the terms in this Privacy Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view ITT’s certification, please visit [https:// www.privacyshield.gov](https://www.privacyshield.gov). Additionally, ITT may endeavor to protect your data through other legally valid methods, including

¹ A full listing of all ITT Inc. subsidiaries can be found in our Securities and Exchange Commission Form 10 -K filing each year.

² To learn more about the Privacy Shield Program, or to view the certification applicable to ITT, please visit www.privacyshield.gov.

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international data transfer agreements. Historically, ITT also complied with Privacy Shield’s predecessor, the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework for Human Resources data.

For the avoidance of doubt, ITT will comply with all applicable local laws when Processing Personal Information (e.g. European General Data Privacy Regulation “GDPR”). In particular any local law conditions for and restrictions on the transfer of Personal Information will be respected by ITT and its affiliates. To demonstrate ITT's commitment to the relevant local laws, the Processing of Human Resources Data might also be governed by additional (local) Human Resources Data privacy policies.

1.3 ROLES & RESPONSIBILITIES

The Senior Vice President, General Counsel and Chief Compliance Officer is responsible for the overall compliance with and interpretation of this Privacy Policy.

The Vice President, Deputy General Counsel and Corporate Secretary is responsible for the implementation of this Privacy Policy.

1.4 KEY TERMS


“Data Subject” is an identified or identifiable natural person.

“Employee” refers to any employee, director, contractor or worker of ITT or its subsidiaries worldwide.

“European Union General Data Protection Regulation” or “GDPR” refers to EU Regulation 2016/679 to harmonize data privacy laws across Europe.

“Personal Information” is any information relating to an identified or identifiable natural person (“Data Subject”); 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.

“Privacy Shield Principles” collectively means the seven (7) privacy principles as described in the Privacy Shield: (1) notice, (2) choice, (3) accountability for onward transfer, (4) security, (5) data integrity and purpose limitation, (6) access, and (7) recourse, enforcement and liability. Additionally, it includes the sixteen (16) supplemental principles described in the Privacy Shield: (1) sensitive data, (2) journalistic exceptions, (3) secondary liability, (4) performing due diligence and conducting audits, (5) the role of the data protection authorities, (6) self-certification,

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(7) verification, (8) access, (9) human resources data, (10) obligatory contracts for onward transfers, (11) dispute resolution and enforcement, (12) choice – timing of opt-out, (13) travel information; (14) pharmaceutical and medical products, (15) public record and publicly available information and (16) access requests by public authorities.

“Process” or “Processing” means any operation which is performed upon Personal Information, whether or not by automatic means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, acquisition, holding, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“Sensitive Data” or “Sensitive Personal Information” is a subset of Personal Information which, due to its nature, has been classified by law or by policy as deserving additional privacy and security protections. Sensitive Personal Information includes Personal Information regarding EU-residents that is classified as a “Special Category of Personal Data” under EU law, which consists of the following data elements: (1) race or ethnic origin; (2) political opinions; (3) religious or philosophical beliefs; (4) trade union membership; (5) genetic data; (6) biometric data where processed to uniquely identify a person; (6) health information; and (7) sexual orientation or information about the individual’s sex life.

“Third Party” is any natural or legal person, public authority, agency or body other than the Data Subject, ITT or ITT’s agents.


2.0 POLICY

2.1 TRANSPARENCY/NOTICE – WHAT PERSONAL INFORMATION WE COLLECT AND HOW WE USE IT

The types of Personal Information we may collect (directly from you or from Third Party sources) depend on the nature of the relationship you have with ITT and the requirements of applicable law. We endeavor to collect information only relevant for the purposes of Processing. Below are the legal bases and some of the ways we collect information and how we use it.

2.2 Customers

ITT collects Personal Information regarding its current, prospective and former customers, visitors and guests (“Customers”). Customer data we collect includes information relating to the sale or support of products and services and marketing preferences, including title, name, address, phone number, email address, payment information and agreements executed with ITT.

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We Process Personal Information about Customers for a variety of business purposes including:

- to generally manage Customer information;
- to respond to questions and requests;
- to provide access to certain areas and features of the ITT Site(s);
- to verify Customer identity;
- to communicate about Customer account and activities on ITT's Site(s) and systems, and, in ITT's discretion, changes to any ITT policy;
- to measure interest in ITT services;
- to tailor content, advertisements, and offers we serve to Customers;
- to send samples, premiums, products and information;
- to process payment for products or services purchased by Customers;
- to improve ITT Sites and systems;
- to develop new products, processes and services;
- to process applications and transactions; and
- for purposes disclosed at the time that Customers provide Personal Information or otherwise with consent.


2.3 Suppliers

ITT collects Personal Information regarding its current, prospective and former suppliers, distributors and business partners ("Suppliers"). Supplier information we collect relates to the management of Suppliers and the receipt of their products and services. It may include title, name, address, phone number, email address, invoicing information and agreements executed with ITT.

We Process Personal Information about Suppliers for a variety of business purposes including:

- to generally manage Supplier information;
- to respond to questions and requests;
- to provide access to certain areas and features of the ITT Site(s);
- to verify Supplier identity;
- to communicate about Supplier account and activities on ITT's Site(s) and systems, and, in ITT's discretion, changes to any ITT policy;
- to measure interest in ITT services;
- to tailor content;
- to process payment for products or services purchased by ITT;
- to improve ITT Sites and systems;
- to develop new products, processes and services;
- to process applications and transactions; and
- for purposes disclosed at the time Suppliers provide personal data or otherwise with consent.

2.4 Social Media Activities

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Generally, online social media resources are interactive tools that enable Data Subjects to collaborate and share information with others. Social media resources include, but are not limited to, social networks, discussion boards, bulletin boards, blogs, wikis and referral functions to share website content and tools with a friend or colleague. ITT may collect Personal Information to enable Data Subjects to use online social media resources. We may also enable you to use these social media resources to post or share Personal Information with others. When using social media resources, you should take into careful consideration what Personal Information they share with others. ITT will comply with the terms of this Privacy Policy and the privacy policies applicable to the social media resources it uses.

2.5 Information from Third Party Sources


ITT may collect information about you from Third Party sources to supplement information provided by you. This supplemental information allows us to verify information that you have provided to ITT and to enhance our ability to provide you with information about our business, products and services as described in the Legal Conditions section of ITT's Site. ITT's agreements with these Third Party sources typically limit how the Company may use this supplemental information.

2.6 Direct Mail, Email and Outbound Telemarketing

Customers and Suppliers who provide us with Personal Information, or whose Personal Information we obtain from Third Parties, may receive periodic emails, mailings or phone calls from us with information on our products and services or upcoming special offers/events we believe may be of interest. We offer our Customers and Suppliers the option to decline these communications at no cost to the individual Customer or Supplier.

2.7 Research/Survey Solicitations

ITT may use Personal Information to create non-identifiable information that we may use alone or in the aggregate with information obtained from other sources, in order to help us to optimally deliver our existing products and ITT services or develop new products and services. From time to time, ITT may perform research (online and offline) via surveys. We may engage Third Party service providers to conduct such surveys on our behalf. All survey responses are voluntary and the information collected will be used for research and reporting purposes to help us to better serve Customers and Suppliers by learning more about their needs and the quality of the products and services we provide. The survey responses may be utilized to determine the effectiveness of our Site, various types of communications, advertising campaigns and/or promotional activities. If a Customer or Supplier participates in a survey, the information given will be used along with that of other

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study participants. We may share anonymous individual and aggregate data for research and analysis purposes.

2.8 All Internet Users – Cookies, Pixel Tags, Web Beacons and Aggregate Information

2.8.1 Cookies


Like many other websites, ITT may employ a cookie, or small piece of computer code that enables web servers to “identify” visitors, each time an individual initiates a session on the Company’s Site. A cookie is set in order to identify Data Subjects and tailor our Site to you. Cookies do not store any of the Personal Information that is provided to the ITT Site; they are simply identifiers. Data Subjects have the ability to delete cookie files from their own hard drive at any time. However, individuals should be advised that cookies may be necessary to provide access to much of the content and many of the features of ITT’s Site. For more information regarding the cookies we use, see our Cookie Policy.

2.8.2 Pixel Tags/Web Beacons

ITT may use “pixel tags”, also known as “web beacons”, which are small graphic files that allow us to monitor the use of our Site. A pixel tag can collect information such as the Internet Protocol (“IP”) address of the computer that downloaded the page on which the tag appears; the URL of the page on which the pixel tag appears; the time the page containing the pixel tag was viewed; the type of browser that fetched the pixel tag; and the identification number of any cookie on the computer previously placed by that server. When corresponding with you via HTML capable email, we may use “format sensing” technology, which allows pixel tags to let us know whether you received and opened our email.

2.8.3 Anonymized and Aggregated Information

ITT may use Personal Information and other information about you to create anonymized and aggregated information, such as de-identified demographic information, de-identified location information, information about the computer or device from which you access ITT’s Site or services, or other analyses we create. Anonymized and aggregated information is used for a variety of functions, including the measurement of visitors’ interest in and use of various portions or features of the Site. Anonymized or aggregated information is not Personal Information, and ITT may use such information in a number of ways, including internal analysis, analytics and research and any other legally permissible purposes. We may share this information with Third Parties for our or their purposes in an anonymized or aggregated form that is designed to prevent anyone from identifying you.

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2.8.4 Analytics

We may also use Google Analytics and Google Analytics Demographics and Interest Reporting to collect information regarding visitor behavior and visitor demographics on some of our Sites, and to develop website content. This analytics data is not tied to any Personal Information. For more information about Google Analytics, please visit www.google.com/policies/privacy/partners/. You can opt out of Google's collection and Processing of data generated by your use of the Services by going to <http://tools.google.com/dlpage/gaoptout>.

2.9 **Mobile Computing**


ITT may provide websites and online resources that are specifically designed to be compatible and used on mobile computing devices. ITT may collect certain information that your mobile device sends when you use such services, like a device identifier, user settings, location information, mobile carrier, and the operating system of your device. Mobile versions of ITT's Site may require that users log in with an account. In such cases, information about use of each mobile version of the Site may be associated with user accounts. In addition, ITT may enable individuals to download an application, widget or other tool that can be used on mobile or other computing devices. Some of these tools may store information on mobile or other devices. These tools may transmit Personal Information to ITT to enable Data Subjects to access user accounts and to enable ITT to track use of these tools. Some of these tools may enable users to email reports and other information from the tool. ITT may use Personal or non-identifiable Information transmitted to the Company to enhance these tools, to develop new tools, for quality improvement and as otherwise described in this Privacy Policy or in other notices ITT provides.

2.10 **Other Uses**

ITT may use Personal Information for which we have a legitimate interest, such as processing for research purposes (including marketing research), processing for historical, scientific or statistical purposes, enforcement of legal claims, fraud prevention, network and information security, direct marketing, and disclosure to affiliated organizations, or any other purpose disclosed to you at the time you provide Personal Information or with your consent.

2.11 **Human Resources Data**

ITT collects Personal Information from current, prospective and former Employees, their contact points in case of a medical emergency, and beneficiaries under any insurance policy ("Human Resources Data"). The Human Resources Data we collect may include title, name, address, phone number, email address, date of birth, bank

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details for payroll, information that may be recorded on a CV or application form, contact information of Third Parties in case of an emergency and beneficiaries under any insurance policy. We may also collect Sensitive Human Resources Data such as details of health and disability, including mental health, medical leave, and maternity leave, as well as information relating to trade union membership.

We Process Human Resources-related Personal Information for a variety of business purposes including:


- Workflow management, assigning, managing and administering projects;
- Human Resources administration and corporate communication;
- payroll and the provision of benefits;
- compensation, including bonuses and long term incentive administration, stock plan administration, compensation analysis, including monitoring overtime and compliance with labor laws, and other company recognition programs;
- job grading activities;
- performance, talent and employee development management;
- organizational development and succession planning;
- benefits and personnel administration;
- absence management;
- IT infrastructure;
- helpdesk and IT support services;
- regulatory compliance;
- internal and/or external or governmental compliance investigations;
- internal or external audits;
- litigation evaluation, prosecution and defense;
- diversity and inclusion initiatives;
- shareholder management;
- restructuring and relocation;
- emergency contacts and services;
- employee safety;
- compliance with statutory requirements;
- Processing of employee expenses and travel charges; and
- acquisitions, divestitures and integrations.

3.0 CHOICE/MODALITIES TO OPT OUT

You have the right to opt out of certain uses and disclosures of your Personal Information, as set out in this Privacy Policy.

3.1 General

Where you have consented to ITT's Processing of your Personal Information or Sensitive Personal Information, you may withdraw that consent at any time and opt

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out. Additionally, before we use Personal Information for any new purpose not originally authorized by you, we will provide information regarding the new purpose and give you the opportunity to opt out.

Even if you opt-out, we may still collect and use non-Personal Information regarding your activities on our Sites and/or information from the advertisements on Third-Party websites for non-interest based advertising purposes, such as to determine the effectiveness of the advertisements.

Prior to disclosing Sensitive Data to a Third Party or Processing Sensitive Data for a purpose other than its original purpose or the purpose authorized subsequently by the Data Subject, ITT will endeavor to obtain each Data Subject's explicit consent (opt-in). Where consent of the Data Subject for the Processing of Personal Information is otherwise required by law or contract, ITT will comply with the law or contract.

3.2 Email and Telephone Communications

An "Unsubscribe" button will be provided at the top or bottom of each email communications sent by ITT so that you can opt-out. However, we will continue to send transaction-related emails regarding products or services you have requested. We may also send you certain non-promotional communications regarding ITT and our products and services and you will not be able to opt out of those communications (e.g., communications regarding updates to our Terms or this Privacy Policy).


We maintain telephone "do not call" lists and "do not mail" lists as mandated by law. We process requests to be placed on "do not mail", "do not phone" and "do not contact" lists within 60 days after receipt, or such shorter time as may be required by law.

3.3 Human Resources Data

With regard to Personal Information that ITT receives in connection with the employment relationship, ITT will use such Personal Information only for employment-related purposes (e.g., tax, payroll, benefits), as more fully described in Section 2.10 above. If ITT intends to use this Personal Information for any other purpose, the Company will provide the Data Subject with an opportunity to opt-out of such uses (e.g., charity, health club membership).

3.4 "Do Not Track"

Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers. DNT is a way for users to inform websites and services that they do not want certain information about their webpage visits collected over time and across

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websites or online services. ITT does not recognize or respond to browser-initiated DNT signals.

4.0 ONWARD TRANSFER

4.1 Information We Share


ITT does not sell or otherwise disclose Personal Information about you, except as described in this Privacy Policy or as you explicitly consent. ITT may share Personal Information with our service providers, consultants and affiliates for our and our affiliates' internal business purposes or to provide you with a product or service that you have requested. Payment information will be used and shared only to effectuate your order and may be stored by a service provider for purposes of future orders. ITT requires our service providers to agree in writing to maintain confidentiality and security of Personal Information they maintain on our behalf and not to use it for any purpose other than the purpose for which ITT retained them. With respect to onward transfers [to agents] under Privacy Shield, Privacy Shield requires that ITT remains liable [should its agents Process Personal Information in a manner inconsistent with the Privacy Shield Principles].

We may disclose information about you: (i) if we are required to do so by law, court order or legal process; (ii) in response to lawful requests by public authorities, including to meet national security or law enforcement requirements; (iii) under the discovery process in litigation; (iv) to enforce ITT policies or contracts; (v) to collect amounts owed to ITT; (vi) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation or prosecution of suspected or actual illegal activity; or (vii) if in good faith we believe that disclosure is otherwise necessary or advisable. In addition, from time to time, server logs may be reviewed for security purposes – e.g., to detect unauthorized activity on the Site. In such cases, server log data containing IP addresses may be shared with law enforcement bodies in order that they may identify users in connection with their investigation of the unauthorized activities.

We reserve the right to disclose or transfer any information we have about you in the event of a proposed or actual purchase, any reorganization, sale, lease, merger, joint venture, assignment, amalgamation or any other type of acquisition, disposal or financing of all or any portion of our business or of any of the business assets or shares (including in connection with any bankruptcy or similar proceeding).

4.2 Data Transfers

All Personal Information sent to or collected by ITT may be Processed and stored anywhere in the world, including but not limited to, in the United States, on the cloud,

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our servers, the servers of our affiliates or the servers of our service providers. By providing information to ITT, you agree to the storage of your Personal Information in these locations. Where required by law, international transfers of Personal Information will be supported by an adequacy mechanism.

5.0 RIGHTS OF ACCESS, RECTIFICATION, ERASURE AND RESTRICTION


Under Privacy Shield, or applicable local laws (e.g. European Global Data Privacy Regulation) you may seek confirmation regarding whether ITT is Processing Personal Information about you, request access to Personal Information, and ask that we correct, amend or delete that information where it is inaccurate or has been Processed in violation of the Privacy Shield Principles or applicable local laws. Where otherwise permitted by applicable law, you may use any of the methods set out in Section 8.0 of this Privacy Policy to request access to, receive (port), restrict Processing, seek rectification or request erasure of Personal Information held about you by ITT. Such requests will be processed in line with local laws. Although ITT makes good faith efforts to provide individuals with access to their Personal Information, there may be circumstances in which ITT is unable to provide access, including but not limited to: where the information contains legal privilege, would compromise others' privacy or other legitimate rights, where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy in the case in question, where the request is manifestly unfounded or excessive, or where the information is commercially proprietary. If ITT determines that access should be restricted in any particular instance, we will provide you with an explanation of why that determination has been made and a contact point for any further inquiries. To protect your privacy, ITT will take commercially reasonable steps to verify your identity before granting access to or making any changes to your Personal Information.

6.0 RETENTION

ITT retains the Personal Information we receive as described in this Privacy Policy for as long as you use our Site or as necessary to fulfill the purpose(s) for which it was collected, provide our products and services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements and comply with all applicable laws.

7.0 SECURITY

The security of all Personal Information provided to ITT is important to us, and ITT takes reasonable steps designed to protect your Personal Information. Unfortunately, no data transmission over the Internet or storage of information can be guaranteed to be 100% secure. As a result, while ITT strives to protect your Personal Information, we cannot ensure or warrant the security of any information you transmit to ITT, and you do so at your own risk. We do not accept liability for unintentional disclosure.

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By using the Site or providing Personal Information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Site. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on the Site or sending an e-mail to you. You may have a legal right to receive this notice in writing.

8.0 REDRESS / COMPLIANCE AND ACCOUNTABILITY

If after reviewing this Privacy Policy, you would like to submit a request or you have any questions or privacy concerns, please contact:

Your local privacy / data protection officer; or


ITT Inc.
 Attn: Legal and Compliance Development
 1133 Westchester Avenue
 White Plains, New York 10604
 Phone: 914-641-2186
 Fax: 914-696-2990
 Email: Lori.marino@itt.com

ITT will address your concerns and attempt to resolve any privacy issues in a timely manner, and may contact individuals in relevant Company departments to assist in completing your requested task.

If, as an EU [or Swiss] Data Subject, you believe that the Company has not adequately resolved any such issues, you may contact the national data protection authority for your EU Member State. ITT has agreed to cooperate with the panel established by local data protection authorities and comply with the advice given by the panel in the investigation and resolution of complaints brought under the Privacy Shield with respect to Human Resources Data. JAMS, a dispute resolution provider which has locations in the United States and the EU, will act as a liaison to ITT to investigate and resolve any Privacy Shield complaints related to other data; for more information and to submit a complaint through JAMS Privacy Shield Dispute Resolution Program, visit <https://www.jamsadr.com/file-an-eu-us-privacy-shield-or-safe-harbor-claim>.

[Such independent dispute resolution mechanisms are available to citizens free of charge. If any request remains unresolved, you may contact the national data protection authority for your EU Member State.](#)

In addition, you may have a right, under certain conditions, to invoke binding arbitration under Privacy Shield; for additional information, see <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>. The FTC has jurisdiction

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over ITT's compliance with the Privacy Shield.

9.0 OTHER RIGHTS AND IMPORTANT INFORMATION

9.1 CHILDREN'S PRIVACY

The ITT's services and the Site are not directed to children under 13 (and in certain jurisdictions under the age of 16) years of age, and ITT does not knowingly collect Personally Information from children under 13 (and in certain jurisdictions under the age of 16) years of age. If you learn that your child has provided us with Personal Information without your consent, you may alert us as set forth in Section 8. If we learn that we have collected any Personal Information from children under 13 (and in certain jurisdictions under the age of 16), we will promptly take steps to delete such information.

9.2 Links to Third Party Websites


Please note that our Site may contain links to other websites for your convenience and information. ITT does not control Third Party websites or their privacy practices, which may differ from those set out in this Privacy Policy. ITT does not endorse or make any representations about Third Party websites. Any Personal Information you choose to give to unrelated Third Parties is not covered by this Privacy Policy. ITT encourages you to review the privacy policy of any company or website before submitting your Personal Information. Some Third Parties may choose to share their users' Personal Information with ITT; that sharing is governed by that company's privacy policy, not this Privacy Policy.

9.3 Changes to the Privacy Policy

ITT may update this Privacy Policy from time to time as it deems necessary in its sole discretion. If there are any material changes to this Privacy Policy, ITT will notify you by email, by means of a notice on our Corporate Policies Sharepoint site or as otherwise required by applicable law. ITT encourages you to review this Privacy Policy periodically to be informed regarding how ITT is using and protecting your information and to be aware of any policy changes. Your continued relationship with ITT after the posting or notice of any amended Privacy Policy shall constitute your agreement to be bound by any such changes. Any changes to this Privacy Policy take effect immediately after being posted or otherwise provided by ITT.

9.4 Compliance

This Privacy Policy shall be implemented by ITT and all its operating divisions and subsidiaries. ITT has put in place mechanisms to verify ongoing compliance with this Privacy Policy. Any Employee that violates this Privacy Policy will be subject to disciplinary procedures.

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10.0 SUPPORTING DOCUMENTS

Doc Number	Title

11.0 SUPERSEDED DOCUMENTS

Title
EU & Swiss Safe Harbor Policy

12.0 CHANGE LOG

Document all modifications to this Privacy Policy in DESCENDING order (most recent to oldest), and include when Privacy Policy was initially released and expired.

Date	Rev	Change Made	Reason	Name
Sept 29, 2016	A	New Policy	Privacy Shield	L. Marino
Nov 30, 2017	B	Updated hyperlink in Section 8.0	Inactive link	D. Bagatta
May 25, 2018	C	Updated for GDPR and Other	New Law	D. Bagatta
Dec 1, 2018	D	Minor Updates	Privacy Shield	D. Bagatta