

European Data Protection and Privacy of Personal Information Policy

Cooper-Standard Automotive Inc. and its subsidiaries (“Cooper Standard”) are committed to protecting the privacy of personal information of its customers, suppliers, employees and other persons with which it does business. Personal information is information or data about an identified or identifiable individual in any format, including verbal, paper and electronic.

Cooper Standard complies with the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. Cooper Standard has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view Cooper Standard’s certification, please visit <http://www.export.gov/safeharbor/>.

The Safe Harbor Principles.

A. Notice

Cooper Standard receives personal information from individuals in a variety of ways and for various reasons. Cooper Standard notifies all individuals about the purposes for which personal information is collected and used.

B. Choice

Cooper Standard provides an individual the opportunity to opt out of allowing personal information to be disclosed to a third party, or used for a purpose incompatible with the purpose for which it was originally collected.

With respect to information that reveals race, ethnic origin, political opinion, religious beliefs, health or sexual orientation or preference (“Sensitive Information”), Cooper Standard will not share such information with third parties nor use it for a purpose other than that for which it was given without affirmative consent (opt-in).

C. Onward Transfer

Prior to transfer of personal information to third parties Cooper Standard will require the third party to give its written agreement to abide by the Safe Harbor Principles. In the event Cooper Standard discovers the third party is not abiding by its privacy obligations, commercially reasonable steps will be taken to prevent a breach of privacy.

D. Security

Cooper Standard will take reasonable precautions to protect personal information from loss, misuse, unauthorized access, disclosure, alteration and destruction. All inquiries from outside the company concerning a request for personal information shall be referred to the Human Resource Department, if employee related, or otherwise the Legal Department for handling.

E. Data Integration

Cooper Standard shall take reasonable steps to ensure data is reliable for its intended use and accurate, complete and current.

F. Access and Correction

Upon request, individuals may access personal information about themselves and request that inaccurate or incomplete information be corrected. An individual who has questions about this policy or would like access to personal information should contact the Cooper Standard Privacy Officer at:

Cooper Standard Privacy Office
39550 Orchard Hill Place
Novi, Michigan 48375
Facsimile (248) 596-6535

G. Enforcement

Cooper Standard ensures compliance with this policy by (i) conducting compliance audits at least annually, (ii) providing a dispute resolution procedure to individuals who feel their rights have been violated, and (iii) disciplining employees who violate this policy.

H. Dispute Resolution

Individuals who feel their privacy rights have been violated should contact the Cooper Standard Privacy Office above. Cooper Standard will investigate and attempt to resolve any complaint or dispute in accordance with this policy.

Cooper Standard is committed to cooperate with data protection authorities (DPAs) located in the European Union (EU) and has agreed to participate in the dispute resolution procedures of the panel established by EU DPAs to resolve disputes pursuant to the Safe Harbor Privacy Principles. More information regarding this procedure can be found at http://ec.europa.eu/justice/data-protection/document/international-transfers/adequacy/files/ussb/complaint_form_20130206_en.pdf.

Cooper Standard reserves the right to amend or modify this policy at any time. The amended policy will apply to data received prior to the amendment to the extent the rights of individuals effected are not reduced.