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I. PURPOSE

This policy affirms Modine’s commitment to comply with the data privacy laws to which the Company is subject (collectively the “Acts”).

In this policy, Modine Manufacturing Company and its wholly and majority-owned subsidiaries, individually and collectively, are referred to as “Modine”. Depending on the nature and origin of the Personal Data, these Acts can apply to our activities across the globe, despite the fact that a law is enacted by one particular country, and the activities occurred in another country.

Violations of the Acts can result in:

- damage to the company’s reputation;
- investigation by regulatory authorities;
- monetary penalties;
- court proceedings;
- breach of contractual obligations and
- in some cases, criminal offenses.

II. SCOPE

This policy applies to all of our directors and employees (each a “Modine Party” and collectively the “Modine Parties”) as well as our distributors, agents, representatives, consultants, joint venture partners, and any other third party acting on behalf of Modine, our subsidiaries and/or affiliates, that collects or processes Personal Data on behalf of Modine (each a “Modine 3rd Party” and collectively called “Modine 3rd Parties”).

It applies to all Personal Data processed by Modine, including Personal Data relating to our employees.


This policy applies to both electronically-based and paper-based Personal Data.

III. POLICY STATEMENT

A. Definitions

The terms used in this Data Privacy Policy are defined as follows:

- **Data Subject:** is any person and potentially also companies whose Personal Data is collected and/or processed.
- **Data Privacy Policy:** is this Modine Data Privacy Policy, unless a supplementary Data Privacy Policy is expressly indicated.


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- **Personal Data:** is any information relating to a specific or identifiable natural person or a potentially specific or identifiable legal entity (“Data Subject”); “specific” denotes an individual who can be identified directly or indirectly, in particular by reference to an identification number or to one or several specific elements that indicate their physical, physiological, mental, economic, cultural or social identity. Anonymised data does not fall within the concept of Personal Data.
- **Processing of Personal Data:** is any operation carried out with or without the use of automated processes or any sequence of procedures relating to Personal Data such as collection, recording, organisation, storage, adaptation or modification, retrieval, consultation, use, disclosure by transfer, dissemination or any other form of provision, combination or linking or the blocking, deletion or destruction of such data.

B. Principles for the processing of Personal Data

The processing of Personal Data is subject to principles including:

- **Individual rights - Protection of the legal individual rights of the Data Subject** when processing Personal Data.
- **Transparency - The Data Subject must be informed regarding the handling of their data.** Personal Data should essentially be collected from the Data Subject themselves, the Data Subject should therefore be able to identify the body responsible for processing the data, the purposes of such processing and the third parties to whom the data may be sent.
- **Data avoidance – Prior to processing, Personal Data must be checked to ascertain whether and to what extent such processing is essential to achieve the intended purpose.** Anonymised data may also be used to the extent proportionate to requirements.
- **Deletion – Personal Data which is no longer required and for which the period of retention has expired for statutory or commercial purposes, should be deleted.**
- **Correctness and validity of data – Personal Data should be stored in a correct, complete and up-to-date state.** Appropriate measures must be implemented to ensure that any incorrect, incomplete or outdated data is deleted, corrected, supplemented or updated.
- **Data Protection – This refers to how Personal Data must be protected when handling it.** This means that Personal Data must be protected through adherence with our procedures, including using appropriate technical measures to prevent unauthorised access, unlawful processing or disclosure and accidental loss, alteration or destruction.

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All Modine Parties and Modine 3rd Parties are expected to maintain the highest standards of ethical behavior and business conduct, including full compliance with the requirements of the Acts. Each Modine Party and Modine 3rd Party must comply with the Acts at any time and has a duty to report any suspected violations immediately.

Data privacy is treated differently in different countries. This policy sets out high level guidance on how Personal Data should be treated in all countries in which Modine operates. However, Modine has put in place certain procedures to ensure that Personal Data is collected and processed appropriately, including when it is processed in countries other than the one in which it is collected. All Modine parties and Modine 3rd parties are expected to comply with the applicable documents.

C. Rights of the Data Subject

All Data Subjects are entitled to rights of access, rectification, deletion, and objection as described in detail in the applicable Standard Practice(s) and/or the applicable Acts.

Any claims must be processed immediately by the responsible body, and must not result in any disadvantage to the Data Subject.

When processing Personal Data, all Modine parties and Modine 3rd parties must adhere to the applicable Standard Practice and/or Work Instruction.

IV. COMPLIANCE RESPONSIBILITY


All employees are responsible for supporting the principles contained herein, and complying with this policy and working with fellow employees to continually monitor the Company's compliance with this policy. Management serves as a role model for supporting these principles and is responsible for monitoring the level of compliance with this policy within the area of their responsibility. In some countries, the management can be held personally liable for the company's infringement of data privacy.

V. DATA PROTECTION CONTROL

Compliance with data protection guidelines and the applicable data protection legislation is subject to regular data protection audits and other controls. The Data Protection Officer at the site is responsible for the implementation of the guidelines and for any other areas in the company having audit rights.

The results of the data protection audits shall be sent to the top management of the relevant site.

The Data Protection Officer must be notified of any key findings under the relevant reporting obligations. The results of any data protection audits shall be submitted to the regulatory data protection authorities upon request, where required by law or when deemed advisable

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by the Data Protection Officer. The responsible data protection authorities may conduct their own investigations using the powers granted to them under the Acts to examine compliance with the provisions of the Acts.

VI. DATA PROTECTION OFFICER

The Data Protection Officer ensures compliance with the national and international data protection legislation. The officer is also responsible for the Data Privacy Policy and shall monitor compliance with such. The Global Data Protection Officer will be appointed by top management.

The relevant Modine companies will also appoint an employee as a statutory Data Protection Officer, and exceptions must be approved by the Global Data Protection Officer.

The names and contact details of the Data Protection Officers and the Modine Director of Global Compliance & Ethics Programs will be published on the Intranet.