
Privacy Policy for European Union and Swiss Personal Data

Woodward Governor Company (Woodward) is committed to providing privacy protection of European Union ("EU") employee ("Member")¹ customer and supplier data maintained by Woodward. It is Woodward's intention to properly address all applicable data privacy regulations worldwide, including the EU Data Protection Directive and the Swiss Federal Act on Data Protections (FADP).

As a result, Woodward publicly declares its adherence to the US-EU Safe Harbor Privacy Principles and the US-Swiss Safe Harbor Privacy Principles with respect to individually identifiable information that Woodward **receives** in the United States from the EU or Switzerland ("Personal Data"). As a Safe Harbor certified company, Woodward demonstrates the adequate privacy protection for Personal Data in accordance with the following Safe Harbor principles: Notice, Choice, Onward Transfer, Security, Data Integrity, Access and Enforcement.

Notice

Woodward collects, processes, and stores Personal Data electronically and in hard copy form. The primary purpose for collecting this data is to enable global management of Human Resources, Marketing, Sales and Purchasing.

The Personal Data Woodward collects from its membership includes: Member Number; Member Contact Information (name, phone #, email and addresses); Current Position (job code); Title; Employment History (Woodward and previous employment); Department Number (current and history); Supervisor (current and history); Gender; Nationality; Pay Rate; Date of Hire; Service Years; Date of Birth; Benefit Information; Performance Reviews; Emergency Contact Details; Photograph and Personal Bank Account Data.

Woodward will not collect sensitive personal data about a Member's medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or information specifying the sexual orientation of the individual without the Member providing an "explicit" or opt-in consent for the collection, use, and disclosure of sensitive personal data. Exceptions include instances where Woodward is required by law to collect the "sensitive" data, or if Woodward has already obtained the explicit consent from the individuals in the EU and Switzerland and does not use the data for any other purpose in the US (other than those specified in the original consent).

The data obtained from Members will be used for the following purpose: Global Headcount Reporting; Staffing; Performance Management; Compensation Reviews; Payroll; Internal Audit; Internal Investigations; Ethics Investigations; Mergers, Acquisitions and Divestitures; Budgeting; Workforce Management; International Assignments; Reporting for Business/Management Review and Decision-Making; Environmental, Health and Safety; Member Recognition; Disaster Recovery and Emergency Response Planning; Building Security; Member Directory for internal company use; Succession Planning and Member Development.

The Personal Data Woodward collects from its customers and suppliers includes: Customer/Supplier Information (name, address, phone, fax, email); Contact Information (names, titles, addresses,

¹The references to "Member" or "Members" in this policy include only those current, former or prospective employees of Woodward subsidiaries (and any other Woodward facilities) that are subject to the EU Data Protection Directive. Woodward respects the privacy rights of **all** of its members worldwide. Each Woodward facility is to observe local requirements as expressed in applicable policy statements.

phone, fax, email); Customer/Supplier Status; Accounts Receivable, Duty Information; Currency and Pricing Lists; Shipping Information; e-Business; Web ID's and Web Preferences; Quality, Inspection and Certification Information; Product Lists; Supplier Ownership Information; Supplier Accounts Payable Information; Bank Account #'s and Tax Information.

Data obtained from customers and suppliers will be used for the following purposes: Contacting Customers/Suppliers; Accounting/Accounts Receivable; Sales Agreements; Purchasing Agreements; Determining Applicable Discounts; Access to e-Business Site; Address Quality Issues and Product Shipment. All potential and existing customers have the option of opting-out of product marketing telephone and e-mail communications. If local laws require an opt-in for marketing communications, Woodward is committed to respecting the customer's preferences.

Any complaints or disputes regarding personal data protection for Woodward Members should be forwarded to the local HR Consultant/Manager.

Any complaints or disputes regarding personal data protection for Woodward customers or suppliers, (whether existing or potential), should be forwarded to the local Supplier/Customer contact or manager.

Any complaints for Members, customers, or suppliers that cannot be resolved by the above should be referred to the Woodward Safe Harbor Privacy Contact, at 1000 E. Drake Rd., Ft. Collins, CO 80525; Telephone – (815) 639-6914; or SafeHarbor@woodward.com.

Woodward agrees to cooperate with the EU Data Protection Authorities or the Swiss Federal Data Protection and Information Commissioner, as applicable, in addressing disputes that cannot be resolved directly.

Choice

Members, customers and suppliers have the opportunity to choose (opt out) whether their Personal Data is disclosed to a third party or used for a purpose that is incompatible with the purpose for which it was originally collected. Currently, Woodward does not generally disclose Personal Data to third parties (other than agents that perform functions on behalf of Woodward), and does not use Personal Data for any purpose that is incompatible with the purposes for which it was originally collected.

If a Member chooses to opt-out of providing Personal Data, they need to make a written request to their local Human Resources department. If a customer or supplier chooses to opt-out of providing Personal Data they need to make a written request to their Woodward contact. Requests will then be evaluated based on relevancy.

Onward Transfer

Woodward will only disclose or share the Personal Data of a Member, customer or supplier with an outside entity or third party administrator if consistent with the principles of notice and choice, as specified above.

Security

Woodward has taken reasonable and appropriate security measures to safeguard Personal Data about Woodward Members, suppliers and customers. Woodward has initiated processes and procedures designed to protect the confidentiality, integrity and recoverability of Personal Data from loss, misuse, unauthorized access, disclosure, alteration and destruction. We have taken reasonable measures to prevent data corruption and unauthorized access to information

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maintained in our database. Those persons having access to Human Resource Information System (HRIS) and customer/supplier databases containing Personal Data only have permissions to view the information they need to do their jobs. The system administrator and Human Resources control access to personal electronic information via user permissions.

Data Integrity

Woodward will only collect Personal Data relevant to its proposed use. Reasonable measures will be taken to ensure that the information is reliable for its intended use, accurate, complete and current.

Access

Members will generally have access to their own Personal Data, except where such access would impose a disproportionate burden or expense on the company, or would interfere with the privacy rights of third parties. Members will also be allowed in certain circumstances to correct, amend, or delete Personal Data that is inaccurate, in accordance with local law standards in the relevant EU jurisdiction for such activities. Requests to review information should be made to the local HR Manager/Consultant. Customers and suppliers will also have the ability in certain circumstances to access their Personal Data. Requests to review such information should be made to the local Woodward contact.

Enforcement

Woodward will also conduct internal compliance reviews as part of the internal self-audit process and provide appropriate training to Members that have access to Member, customer and/or supplier Personal Data.

Any Member who violates Woodward's privacy and/or security policies is subject to disciplinary action, up to and including termination where permitted by applicable law. If a Member, customer or supplier believes Woodward or a Woodward representative is not observing the principles stated within this policy, they should contact Woodward directly. Concerns can also be reported to Woodward Safe Harbor Privacy Contact, at 1000 E. Drake Rd., Ft. Collins, CO 80525; Telephone – (815) 639-6914; or SafeHarbor@woodward.com.

Notification of Change

Any changes made to the privacy policy will be posted to the Internet, Intranet and other places we deem appropriate. Woodward wants to ensure current and prospective Members, customers and suppliers are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. We will use information in accordance with the privacy policy under which the information was collected, and respect any applicable legal requirements concerning any changes to the policy or our information practices.

The Corporate Vice President, Human Resources and Woodward's General Counsel must approve all changes to this policy and/or privacy practices. Any changes made to our privacy practices will be prominently posted on our Web site.



Tom Gendron
Chairman of the Board & Chief Executive Officer