

FLEXSYS
EMPLOYEE FAIR PROCESSING NOTICE
("NOTICE")

1. What is this document and why should you read it?

This privacy notice explains how and why Flexsys Holdings Inc. including each of its operating entities (also referred to as "Flexsys", "we", "our" and "us") uses personal data about its employees, staff, contractors, trainees, officers, consultants, and temporary or agency workers (referred to as "you").

The table below lists the names of the relevant Flexsys entities which may be controlling personal data and for which the same privacy notice applies.

Company Name	Company Number	Registered Address	Contact Details	Controller of Personal Data
Flexsys Holdings Inc.	EIN: 87-2564988	United Agent Group, Inc. 3411 Silverside Road Tatnall Building #104 Wilmington, DE 19810	Elliot, Joshua North America HR Manager joshuaelliott@flexsys.com +1 423 408-3885 Monongahela, PA	North America HR Manager Monongahela, PA
Flexsys Americas L.P.	EIN: 34-1794583	United Agent Group, Inc. 3411 Silverside Road Tatnall Building #104 Wilmington, DE 19810	Elliot, Joshua North America HR Manager joshuaelliott@flexsys.com +1 423 408-3885 Monongahela, PA	North America HR Manager Monongahela, PA
Flexsys America LLC	EIN: 34-1794581	United Agent Group, Inc. 3411 Silverside Road Tatnall Building #104 Wilmington, DE 19810	Elliot, Joshua North America HR Manager joshuaelliott@flexsys.com +1 423 408-3885 Monongahela, PA	North America HR Manager Monongahela, PA
Flexsys, Inc.	EIN: 87-0881270	United Agent Group, Inc. 3411 Silverside Road Tatnall Building #104 Wilmington, DE 19810	Elliot, Joshua North America HR Manager joshuaelliott@flexsys.com +1 423 408-3885 Monongahela, PA	North America HR Manager Monongahela, PA
Flexsys Germany GmbH	TAX ID: 133/5824/WV	c/o Latham & Watkins LLP, Dreischeibenhau 1, 40211 Düsseldorf	Schuto, Svenja EMEA HR Leader svenja.schuto@flexsys.com +49 502 1988306 Neinberg Europe	EMEA HR Leader Neinberg Europe
[Flexsys Chemicals (Shanghai) Co Ltd.	TBD	Room 649, 6F, No. 2899, Jinke Road, Pudong New District, Shanghai, China	Zhongting Wang Executive Director, Flexsys Shanghai zhongting.wang@flexsys.com +8613585803701 Shanghai, China	General Manager Kuantan Asia Pacific
Flexsys Netherlands B.V.	RSIN (TAX ID): 862937516	Weena-zuid 130, Begane grond, 3012NC Rotterdam Front desk: +31 107997300	Schuto, Svenja EMEA HR Leader svenja.schuto@flexsys.com +49 502 1988306 Neinberg Europe	EMEA HR Leader Neinberg Europe
Flexsys Malaysia Sdn. Bhd.	COMPANY ID: 202101225893 (1426193-V)	Lot 120/120A, Jalan Gebeng 2/3 Gebeng Industrial Estate Phase 2, 26080 Kuantan Pahang Darul Makmur Malaysia	Sudershan Sivasubramaniam Site Manager; Kuantan sudershan.sivasubramaniam@flexsys.com +6095856301, ext 6301 Kuantan Asia Pacific	Site Manager Kuantan Asia Pacific

Flexsys Japan G.K.	TAX ID: 2010003035668	13th floor, Pacific Century Place Marunouchi, 1-11-1 Marunouchi, Chiyoda-ku, Tokyo 100-0005 Japan 〒100-0005 東京都千代田区丸の内1丁目11-1 パシフ	Fujiyama, Masato Global Key Account Manager masato.fujiyama@eastman.com Tokyo, Japan	Account Manager Kuantan Asia Pacific

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Nova Aditivos Brazil Ltda.	FEDERAL TAX ID: 43.210.603/0001-20 STATE TAX ID: 388.113.192.119	Rodovia Akzo Nobel, 707, Crystex Building (Gate B), São Roque da Chave, Zip Code 13295- 422, Itupeva, São Paulo, Brasil	Elcio Shoda Site Manager, Itupeva elcio.shoda@flexsys.com +55 11 98447 2610 Itupeva, Brasil	Site Manager São Paulo, Brazil Latin America
Industriepark Nienburg GmbH	TAX ID: 34/200/10941	Operating Address: Große Drakenburger Strasse 93-97, 31582 Nienburg/Weser, Germany	Schuto, Svenja EMEA HR Leader svenja.schuto@flexsys.com +49 502 1988306 Neinberg Europe	EMEA HR Leader Neinberg Europe
Flexsys Verkauf GmbH	TAX ID: 34/200/15145	Operating Address: Große Drakenburger Strasse 93-97, 31582 Nienburg/Weser, Germany	Schuto, Svenja EMEA HR Leader svenja.schuto@flexsys.com +49 502 1988306 Neinberg Europe	EMEA HR Leader Neinberg Europe
Flexsys Chemicals Belgium NV	COMPANY NO. (TAX ID): 0772.781.677)	Vorstlaan 36, bus 15, 1170 WatermaalBosvoorde, Belgium	Jennings, John General Counsel jppenn@flexsys.com +32 475 96 02 46	Schuto, Svenja EMEA HR Leader Neinberg Europe
Flexsys India Private Limited	CORPORATE IDENTITY NUMBER (CIN): U82990MH2023FTC403653	PL13 ExtOff Pirojshanagar East ExpHighway Vikhroli Mumbai Mumbai Mumbai MH 400079 IN	S. Anandan Director, Flexsys India ssanan@flexsys.co m +919840077030 Chennai, India	APAC HR Director Kuantan Asia Pacific

You should read this notice, so that you know what we are doing with your personal data. Please also read any other privacy notices that we give you, that might apply to our use of your personal data in specific circumstances in the future.

This notice does not form part of your contract of employment or any other contract to provide services.

2. Flexsys' data protection responsibilities

"**Personal data**" is any information that relates to an identifiable natural person. Your name, address, contact details, salary details and CV are all examples of your personal data, if they identify you.

The term "**process**" means any activity relating to personal data, including, by way of example, collection, storage, use, consultation and transmission.

Flexsys is a "**controller**" of your personal data. This means that we make decisions about how and why we process your personal data and, because of this, we are responsible for making sure it is used in accordance with data protection laws.

3. What types of personal data do we collect and where do we get it from?

We collect many different types of personal data about you for lots of reasons. We cannot administer our employment or other relationship with you without your personal data. Where we don't need your personal data, we will make this clear, for instance we will explain if any employment forms you are required to complete are optional and can be left blank.

Further details of the personal data we collect, where we get it from and what we do with it are set out in **Schedule 1**.

You provide us with personal data when you apply for a job with us, when you complete our employee information forms, correspond with us and in the course of performing your job. We also obtain some personal data from other sources, and create some personal data ourselves.

As set out in the table at **Schedule 1**, we collect your personal information from you directly and sometimes we obtain it from other people and organizations, including some public sources, such as publicly available directories and online resources, your emergency contacts, your use of Flexsys-provided assets, systems and platforms, your line manager and co-workers, your dependants and beneficiaries, and third-party benefits providers.

Due to the type of business undertaken by Flexsys, we also conduct background checks on our employees as permitted by local law. Depending on the job role, these checks can relate to any criminal convictions that you may have and include those checks that are required by mandatory applicable law and those required for our own policy compliance. Please see also the section below in relation to 'Sensitive Information'.

If any of the personal information you have given to us changes, such as your contact details, please contact a local Human Resource representative.

4. **What do we do with your personal data and why?**

We process your personal data for particular purposes in connection with your employment or engagement with us, and the management and administration of our business.

We are required by law to always have a so-called "lawful basis" (i.e. a reason or justification) for processing your personal data. The table at **Schedule 2** sets out the different purposes for which we process your personal data and the relevant lawful basis on which we rely for that processing. In the event we intend to further process your personal data for a purpose other than that for which the personal data were collected, we will provide you with additional information on that further processing prior to that further processing.

We have a fiduciary duty and are obliged to protect our assets and employees. To accomplish this, we may use various monitoring techniques based upon several factors:

- (a) Your access to sensitive or privileged Company information;
- (b) You are under reasonable suspicion of a crime or violation of our Code of Business Conduct; or
- (c) Changes in your employment status that would justify and warrant processing (e.g. departing Flexsys); or
- (d) You have an approved IT security exception (like a USB exception).

Monitoring may include the evaluation of network traffic on Flexsys networks and the recording of screen activity on Flexsys administrated devices, as permitted by local law. Screen recording includes the creation of a video of all activity performed by a user on a Flexsys device. This may include web browsing activity, file creation and editing, email communication, and chat interactions. Video evidence is evaluated based upon alert conditions. For example, if a user plugs in a USB device, an alert is triggered, and the video is examined. All review activity of video evidence is itself recorded to prevent misuse. Videos are purged from the system in accordance to the data retention policy. Web cameras and video of the user themselves is not recorded.

Furthermore, our network activity is constantly being logged and evaluated to prevent malware and cyber security incidents.

Please note that where we have indicated in the table at **Schedule 2** that our processing of your personal data is either:

- (a) necessary for us to comply with a legal obligation; or
- (b) necessary for us to take steps, at your request, to potentially enter into an employment contract with you, or to perform it,

if you choose not to provide the relevant personal data to us, we may not be able to enter into or continue our contract of employment or engagement with you.

We may also convert your personal data into statistical or aggregated form to better protect your privacy, or so that you are not identified or identifiable from it. We may use it to conduct research and analysis, including to produce statistical research and reports. For example, to help us understand how many of our total workforce number are on secondments at any given time.

5. **Sensitive Information**

Some of the processing described in the table at **Schedule 2** will include the processing of 'special categories of personal data' and/or sensitive personal data (together, "**Sensitive Information**"). This refers to sensitive or special categories of personal data for which applicable laws require us to process with more care.

The table at **Schedule 3** sets out the different purposes for which we process your Sensitive Information and the relevant lawful basis on which we rely for that processing. For some processing activities, we consider that more than one lawful basis may be relevant - depending on the circumstances.

6. **Who do we share your personal data with, and why?**

Sometimes we need to disclose your personal data to other people.

Inside Flexsys' Group:

We are part of the Flexsys group, which includes a number of companies and operations globally. Therefore, we will need to share your personal data with other companies in the Flexsys group for our general business and workforce management and human resources management purposes and, in some cases, to meet our customer needs where working across offices/locations, for line management, authorizations/approvals with relevant decision makers, reporting and where systems and services are provided on a shared basis. For example, your business contact details will be available to colleagues throughout the group.

Access rights between members of the Flexsys group are limited and granted only on a need to know basis, depending on job functions and roles.

Where any Flexsys group companies process your personal data on our behalf (as our processor), we will make sure that they have appropriate security standards in place to make sure your personal data is protected and we will enter into a written contract imposing appropriate security standards on them.

Outside Flexsys Group:

From time to time we may ask third parties to carry out certain business functions for us, such as the administration of our payroll, HR support and our IT support. These third parties will process your personal data on our behalf (as our processor). We will disclose your personal data to these parties so that they can perform those functions. Before we disclose your personal data to these third parties, we will seek to ensure that they have appropriate security standards in place to protect your personal data and we will enter into a written contract imposing appropriate security standards on them. Examples of these third-party service providers include service providers and/or sub-contractors, include our outsourced payroll, HR and marketing service providers, and our IT systems software and maintenance, back up, and server hosting providers.

In certain circumstances, we will also disclose your personal data to third parties who will receive it as controllers of your personal data in their own right for the purposes set out above, where the relevant disclosure is:

- (a) if we buy or sell our business (or part of it) in connection with a share or asset sale, we may disclose or transfer your personal data to the prospective seller or buyer and their advisors; and
- (b) if we need to disclose your personal data in order to comply with a legal obligation, to enforce a contract or to protect the rights, property or safety of our employees, customers or others.

We have set out below a list of the categories of recipients with whom we are likely to share your personal data:

- (i) employment-related benefits providers and other third parties in connection with your benefits (such as pension trustees);
- (ii) human resource-related service providers (such as Human Resource Information System providers);
- (iii) customers or clients of Flexsys (for example, when tendering for work);

- (iv) consultants and professional advisors including legal advisors and accountants;
- (v) courts, court-appointed persons/entities, receivers and liquidators;
- (vi) business partners and joint ventures;
- (vii) trade associations and professional bodies;
- (viii) insurers; and
- (ix) governmental departments, statutory and regulatory bodies.

7. Where in the world is your personal data transferred to?

As part of a global organization, Flexsys may transfer your personal data to recipients (either internally or externally, as set out above) that are established in jurisdictions other than your own, including outside the European Economic Area (“**EEA**”). Please be aware that the data protection laws in some jurisdictions may not provide the same level of protection to your personal data as is provided to it under the laws in your jurisdiction.

If any disclosures of personal data referred to above require your personal data to be transferred, we will only make that transfer if:

- (a) the country to which the personal data is to be transferred ensures an adequate level of protection for personal data (for example, if available, on the basis of a so-called adequacy decision by the European Commission);
- (b) we have put in place appropriate safeguards to protect your personal data, such as an appropriate contract with the recipient (including the Standard Contractual Clauses published by the European Commission, as applicable);
- (c) the transfer is necessary for one of the reasons specified in data protection legislation, such as the performance of a contract between us and you; or
- (d) you explicitly consent to the transfer.

For more information on our personal data transfer mechanisms, including obtaining a copy of the appropriate safeguards we rely on, please contact the **Privacy Office at privacy@flexsys.com**.

8. How do we keep your personal data secure?

We will take specific steps (as required by applicable data protection laws) to ensure we take appropriate security measures to protect your personal data from unlawful or unauthorised processing and accidental loss, destruction or damage.

9. How long do we keep your personal data for?

If you are our employee we will keep your personal data during the period of your employment and then, after your employment with us ends, for as long as is necessary in connection with both our and your legal rights and obligations. This may mean that we keep some types of personal data for longer than others.

We will only retain your personal data for a limited period of time. This will depend on a number of factors, including:

- (a) any laws or regulations that we are required to follow;
- (b) whether we are in a legal or other type of dispute with each other or any third party;
- (c) the type of information that we hold about you; and
- (d) whether we are asked by you or a regulatory authority to keep your personal data for a valid reason.

Any personal data contained in any work-related correspondence or records may be retained for longer, dependant on the retention period of the file that your personal data is held on.

For more information on our data retention practices, please refer to the data retention policy.

10. What are your rights in relation to your personal data and how can you exercise them?

You have certain rights, which are briefly summarised at **Schedule 4**, in relation to any personal data about you which we hold.

Where our processing of your personal data is based on your **consent** (please see **Schedules 2 and 3**), you have the right to withdraw your consent at any time. If you do decide to withdraw your consent we will stop processing your personal data for that purpose, unless there is another lawful basis we can rely on - in which case, we will let you know. Your withdrawal of your consent won't impact any of our processing up to that point.

Where our processing of your personal data is necessary for our **legitimate interests** (please see **Schedule 2**), you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which legitimately overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.

If you wish to further understand or exercise any of these rights, please contact a local Human Resource representative or the **Privacy Office at privacy@flexsys.com**.

11. Updates to this notice

We may update this notice from time to time to reflect changes to the type of personal data that we process and/or the way in which it is processed. We encourage you to check this notice on a regular basis.

12. Where can you find out more?

If you want more information about any of the subjects covered in this privacy notice or if you would like to discuss any issues or concerns with us, please contact a local Human Resource representative or the **Privacy Office at privacy@flexsys.com**.

SCHEDULE 1

CATEGORIES OF PERSONAL DATA

Type of personal data	Collected from
<p>1. Contact Information</p> <ul style="list-style-type: none"> • Name(s) • Address(es) • Email address(es) • Contact details including mobile telephone number(s) 	<ul style="list-style-type: none"> • You
<p>2. Personal Information</p> <ul style="list-style-type: none"> • Contact information (see above), as relevant • Date of birth • Gender • Next of kin or other dependants • Marital or relationship status • Emergency contact information 	<ul style="list-style-type: none"> • You
<p>3. Identity and Background Information</p> <ul style="list-style-type: none"> • Contact information (see above), as relevant • Details of education and qualifications and results • Career history, experience and skills • Passport information • Driving licence information • Right to work, residency and/or other visa information (where unrelated to your race or ethnicity) • Curriculum Vitae (CV) or resume • Educational certificates or other qualification evidence • Image or photographs • Application form • Evaluative notes and decisions from job interviews • Preferences relating to job location and salary • Conflicts of interests (including where related to family networks) • Background checks relating to employment history, credit information, social media, and criminal records (see also Sensitive Information) to the extent applicable and permissible under local laws 	<ul style="list-style-type: none"> • You • Recruitment consultants and agencies • Your previous employers • Publicly available information from online resources
<p>4. Financial Information</p> <ul style="list-style-type: none"> • Contact information (see above), as relevant • Bank account details • Salary, compensation and other remuneration information • National insurance number and/or other governmental identification numbers • Tax codes • Business expense and reimbursement details • For applicable employees, long-term incentive plans including company stock options, and company sponsored benefit plans 	<ul style="list-style-type: none"> • You • Your previous employer

Type of personal data	Collected from
5. Sensitive Information (where required or applicable locally)	
<ul style="list-style-type: none"> • Contact information (see above), as relevant • Racial or ethnic origin (including your nationality and visa information) to the extent applicable and permissible under local laws • Trade union membership • Data concerning physical and/or mental health (including occupational health requirements, accident reports, day-to-day health concerns such as diabetes or epilepsy conditions which we should be aware of, dietary requirements, allergies, drug and alcohol test results and reasons for any short term or long term absence) • Biometric data • Health and safety and accident records and reports • Information relating to actual or suspected criminal convictions and offences (except in Brazil). 	<ul style="list-style-type: none"> • You • Your emergency contact(s) • Your use of Flexsys security control systems
6. Employment Administration Information	
<ul style="list-style-type: none"> • Contact information (see above), as relevant • Terms and conditions of employment • Work related contact details (including location and office and corporate phone numbers) • Image/photographs • Holiday and other leave related records • Your working preferences and feedback in relation to Flexsys and our staff • Your preferences in relation to our use of your personal data • Hours worked and working time preferences • Statutory and non-statutory leave and absence records • Job termination details 	<ul style="list-style-type: none"> • You
7. Job Performance Information	
<ul style="list-style-type: none"> • Contact information (see above), as relevant • Role responsibilities • Personal development reviews and appraisals, and associated feedback • Training records • Attendance information, including clocking in/out systems or timesheets • Promotion application and/or outcome records • Transfer and secondment information 	<ul style="list-style-type: none"> • You • Your line manager(s) and coworkers • Training providers • Company to which transferred or seconded
8. Investigation, Grievance and Disciplinary	

- Contact information (see above), as relevant
- Flexsys investigations records
- Grievance and disciplinary records
- Employment tribunal records

- You
- Your line manager(s) and co-workers
- Third parties, as permitted by applicable law
- Flexsys Legal
- Flexsys Compliance Office

Type of personal data	Collected from
9. Travel and Expenses Information	
<ul style="list-style-type: none"> • Contact information (see above), as relevant • Transaction records • Visa, passport and insurance details • Flight and accommodation booking information • Travel itinerary information 	<ul style="list-style-type: none"> • You • Your use of Flexsys payment cards or expense reimbursement requests (where relevant)
10. Benefits Information	
<ul style="list-style-type: none"> • Contact information (see above), as relevant • Private healthcare, life assurance and pensions memberships for you and/or your dependants or other beneficiaries • Death benefit information 	<ul style="list-style-type: none"> • You • Third-party benefits providers • Your dependants or other beneficiaries
11. Asset, Systems and Platform Usage and Communications Information	
<ul style="list-style-type: none"> • Contact information (see above), as relevant • Computer and phone records • Access logs and usage records from document management systems and other Flexsys provided applications and technologies • User IDs and password information • IP addresses and device identifiers • Relevant records of calls, messages and/or internet or other data traffic and communications 	<ul style="list-style-type: none"> • You • Your use of Flexsys assets, systems and platforms
12. Security, Location and Access Information	
<ul style="list-style-type: none"> • Contact information (see above), as relevant • Information (including image) captured or recorded by electronic card access systems, CCTV and other security control systems 	<ul style="list-style-type: none"> • You • Your use of Flexsys security control systems

SCHEDULE 2

PROCESSING ACTIVITIES AND LAWFUL BASIS

	Purposes of processing	Categories of personal data	Lawful basis We are permitted to process your personal data because...				
			You have given your consent to the processing	It is necessary to perform your employment contract (in Germany: as necessary for purposes of the employment relationship)	It is necessary for us to comply with a legal obligation	It is necessary for our legitimate interests or those of third parties (as permitted by local laws)	It is necessary to protect your vital interests (or those of someone else)
a) Recruitment and workforce planning							
1.	Developing, operating and collecting feedback on recruitment activities and employee selection processes	<ul style="list-style-type: none"> Personal Information Identity and Background Information Job Performance Information 				✓	
2.	Administering your application for a job with us and considering your suitability for the relevant role	<ul style="list-style-type: none"> Personal Information Identity and Background Information Job Performance Information 		(✓ for Germany and Brazil)		✓	
3.	Obtaining, considering and verifying your employment references and employment history	<ul style="list-style-type: none"> Identity and Background Information Job Performance Information 		(✓ for Germany)		✓	
4.	Reviewing and confirming your right to work	<ul style="list-style-type: none"> Identity and Background Information 		(✓ for Germany)	✓		
5.	Conducting verification and vetting, including criminal background checks and credit	<ul style="list-style-type: none"> Identity and Background Information 			✓	(✓ for Brazil)	

	Purposes of processing	Categories of personal data	Lawful basis				
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			You have given your consent to the processing	It is necessary to perform your employment contract (in Germany: as necessary for purposes of the employment relationship)	It is necessary for us to comply with a legal obligation	It is necessary for our legitimate interests or those of third parties (as permitted by local laws)	It is necessary to protect your vital interests (or those of someone else)
	checks where required by law (Note: please also see Schedule 3)	Sensitive Information (except in Brazil)					
6.	Conducting background checks, verification and vetting which are not required by law but needed by us to assess your suitability for your role (Note: please also see Schedule 3)	<ul style="list-style-type: none"> Identity and Background Information Sensitive Information (except in Brazil) 	✓			(✓ for Brazil)	
7.	Making a job offer to you and entering into a contract of employment with you	<ul style="list-style-type: none"> Personal Information Financial Information Employment Administration Information Benefits Information 		✓			
8.	Identifying and assessing Flexsys' strategic business direction and resourcing needs, current employees and areas for development	<ul style="list-style-type: none"> Employment Administration Information Job Performance Information 				✓	
9.	Promotion and succession planning	<ul style="list-style-type: none"> Employment Administration Information Job Performance Information 				✓	
10.	Analysing recruitment and retention objectives, processes and employee turnover rates	<ul style="list-style-type: none"> Employment Administration Information 				✓	

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		<ul style="list-style-type: none"> Job Performance Information 					
b) General employment management and administration							
11.	Communicating with you and providing you with information in connection with your employment or engagement with us from time to time	<ul style="list-style-type: none"> Personal Information 		✓		✓	✓
12.	Paying your salary, compensation and any other benefits pursuant to your contract of employment	<ul style="list-style-type: none"> Financial Information Employment Administration Information Benefits Information 		✓			
13.	Calculating and administering taxation within payroll, and your entitlements to any statutory / contractual benefits (including statutory sick pay and workforce pension arrangements)	<ul style="list-style-type: none"> Financial Information Employment Administration Information Benefits Information 			✓		
14.	Facilitating the administration of any private healthcare, life assurance/insurance, pensions initiatives and plans that we offer in connection with your employment with us (Note: please also see Schedule 3)	<ul style="list-style-type: none"> Financial Information Employment Administration Information Benefits Information Sensitive Information 		(✓ for Brazil)	✓	✓	

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			You have given your consent to the processing	It is necessary to perform your employment contract (in Germany: as necessary for purposes of the employment relationship)	It is necessary for us to comply with a legal obligation	It is necessary for our legitimate interests or those of third parties (as permitted by local laws)	It is necessary to protect your vital interests (or those of someone else)
15.	General staff administration, including workforce management and facilities operations	<ul style="list-style-type: none"> • Employment Administration Information • Asset, Systems and Platform Usage and Communications Information 				✓	
16.	Managing our health and safety compliance obligations (Note: please also see Schedule 3)	<ul style="list-style-type: none"> • Employment Administration Information • Sensitive Information 			✓		
17.	Managing annual leave entitlement and records, and to administer related payments	<ul style="list-style-type: none"> • Financial Information • Employment Administration Information 			(✓ for Brazil)	✓	
18.	Managing absence records, contractual sick leave entitlement and administering related payments (Note: please also see Schedule 3)	<ul style="list-style-type: none"> • Financial Information • Employment Administration Information • Sensitive Information 		✓	(✓ for Brazil)	✓	
19.	Managing maternity, paternity, adoption, parental and dependants leave and (where applicable) pay (Note: please also see Schedule 3)	<ul style="list-style-type: none"> • Financial Information • Employment Administration Information 			✓		

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		<ul style="list-style-type: none"> Sensitive Information 					
20.	Contacting the appropriate person in the event of an emergency concerning you (Note : please also see Schedule 3)	<ul style="list-style-type: none"> Personal Information Sensitive Information 					✓
21.	Administering our insurance policies (Note : please also see Schedule 3)	<ul style="list-style-type: none"> Employment Administration Information Sensitive Information 		(✓ for Brazil)			
22.	Determining whether any adjustments are necessary to enable you to carry out your role (Note : please also see Schedule 3)	<ul style="list-style-type: none"> Personal Information Sensitive Information 		✓	✓		
23.	Preparing risk assessments to prevent future injuries in the workplace (Note : please also see Schedule 3)	<ul style="list-style-type: none"> Employment Administration Information Sensitive Information 			✓		
24.	Carrying out performance reviews	<ul style="list-style-type: none"> Job Performance Information 				✓	
25.	Allocating and assigning responsibilities as necessary for workload management	<ul style="list-style-type: none"> Employment Administration Information 				✓	

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	purposes, and measuring staff utilisation	<ul style="list-style-type: none"> • Job Performance Information • Asset, Systems and Platform Usage and Communications Information 					
26.	Administering, recording and analysing training and training records	<ul style="list-style-type: none"> • Employment Administration Information • Job Performance Information • Asset, Systems and Platform Usage and Communications Information 				✓	
27.	Supporting the establishment and maintenance of staff directories	<ul style="list-style-type: none"> • Employment Administration Information 				✓	
28.	Considering your continuous suitability for your role	<ul style="list-style-type: none"> • Job Performance Information 				✓	
29.	Providing details of your employment to a new or potential employer, bank or financial institution where requested by you	<ul style="list-style-type: none"> • Financial Information • Employment Administration Information • Job Performance Information • Benefits Information 	✓				

	Purposes of processing	Categories of personal data	Lawful basis				
			We are permitted to process your personal data because...				
			You have given your consent to the processing	It is necessary to perform your employment contract (in Germany: as necessary for purposes of the employment relationship)	It is necessary for us to comply with a legal obligation	It is necessary for our legitimate interests or those of third parties (as permitted by local laws)	It is necessary to protect your vital interests (or those of someone else)
30.	Handling grievance and disciplinary matters, including investigating issues, considering appropriate resolution and mitigating actions and reviewing outcomes	<ul style="list-style-type: none"> Investigation, Grievance and Disciplinary 				✓	
31.	Responding to reference requests from your future potential employers	<ul style="list-style-type: none"> Employment Administration Information Job Performance Information Investigation, Grievance and Disciplinary 				✓	
c) Security and governance							
32.	Monitoring the security of Flexsys's physical premises and systems, networks and applications	<ul style="list-style-type: none"> Security, Location and Access Information 			✓	✓	
33.	Identifying and authenticating employees and other individuals (Note: please also see Schedule 3)	<ul style="list-style-type: none"> Security, Location and Access Information Sensitive Information 				✓	
34.	Establishing a network of emergency contacts for individuals in case of emergency	<ul style="list-style-type: none"> Personal Information Security, Location and Access Information 				✓	(✓ for Brazil)

	Purposes of processing	Categories of personal data	Lawful basis We are permitted to process your personal data because...				
			You have given your consent to the processing	It is necessary to perform your employment contract (in Germany: as necessary for purposes of the employment relationship)	It is necessary for us to comply with a legal obligation	It is necessary for our legitimate interests or those of third parties (as permitted by local laws)	It is necessary to protect your vital interests (or those of someone else)
35.	Identifying, investigating and mitigating suspected misuse of Flexsys's assets, systems and platforms (Note: please also see Schedule 3)	<ul style="list-style-type: none"> • Asset, Systems and Platform Usage and Communications Information • Security, Location and Access Information • Sensitive Information (except in Brazil) 			✓	✓	
36.	Ensuring compliance with Flexsys policies and procedures (Note: please also see Schedule 3)	<ul style="list-style-type: none"> • Identity and Background Information • Employment Administration Information • Investigation, Grievance and Disciplinary • Travel and Expenses Information • Asset, Systems and Platform Usage and Communications Information • Security, Location and Access Information • Sensitive Information 				✓	
d) Legal and regulatory compliance and responsibilities							

	Purposes of processing	Categories of personal data	Lawful basis We are permitted to process your personal data because...				
			You have given your consent to the processing	It is necessary to perform your employment contract (in Germany: as necessary for purposes of the employment relationship)	It is necessary for us to comply with a legal obligation	It is necessary for our legitimate interests or those of third parties (as permitted by local laws)	It is necessary to protect your vital interests (or those of someone else)
37.	Managing and administering our equal opportunities reporting (Note: please also see Schedule 3)	<ul style="list-style-type: none"> Sensitive Information (except in Brazil) 			✓		
38.	Responding to binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities (Note: please also see Schedule 3)	Potentially all categories of personal data			✓		
39.	Responding to non-binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities (Note: please also see Schedule 3)	Potentially all categories of personal data				✓	
40.	Complying with disclosure orders arising in civil proceedings (Note: please also see Schedule 3)	Potentially all categories of personal data			✓		
41.	Investigating, evaluating, demonstrating, monitoring, improving, reporting on and meeting Flexsys's compliance with relevant legal and regulatory requirements (Note: please also see Schedule 3)	Potentially all categories of personal data			✓		

	Purposes of processing	Categories of personal data	Lawful basis				
			We are permitted to process your personal data because...				
			You have given your consent to the processing	It is necessary to perform your employment contract (in Germany: as necessary for purposes of the employment relationship)	It is necessary for us to comply with a legal obligation	It is necessary for our legitimate interests or those of third parties (as permitted by local laws)	It is necessary to protect your vital interests (or those of someone else)
42.	Investigating, evaluating, demonstrating, monitoring, improving, reporting on and meeting Flexsys's compliance with best practice and good governance responsibilities (Note: please also see Schedule 3)	Potentially all categories of personal data				✓	
43.	Responding to employment and industrial relations matters where permitted by applicable law, including criminal investigations, grievances, arbitrations, negotiations, elections and strikes (Note: please also see Schedule 3)	<ul style="list-style-type: none"> • Identity and Background Information • Employment Administration Information • Investigation, Grievance and Disciplinary • Security, Location and Access Information • Sensitive Information 			✓	✓	
e) Day-to-day business operations							
44.	Implementing, adapting and enhancing systems and processes to develop or improve our business and/or make your job easier or more enjoyable	<ul style="list-style-type: none"> • Employment Administration Information • Investigation, Grievance and Disciplinary • Asset, Systems and Platform Usage and 				✓	

	Purposes of processing	Categories of personal data	Lawful basis				
			We are permitted to process your personal data because...				
			You have given your consent to the processing	It is necessary to perform your employment contract (in Germany: as necessary for purposes of the employment relationship)	It is necessary for us to comply with a legal obligation	It is necessary for our legitimate interests or those of third parties (as permitted by local laws)	It is necessary to protect your vital interests (or those of someone else)
		Communications Information <ul style="list-style-type: none"> • Security, Location and Access Information 					
45.	Managing, planning and delivering our global business, sales and marketing strategies	<ul style="list-style-type: none"> • Employment Administration Information • Job Performance Information 				✓	
46.	Supporting our diversity programmes and staff support networks and initiatives (Note: please also see Schedule 3)	<ul style="list-style-type: none"> • Personal Information • Sensitive Information 	✓				
47.	Publishing external facing materials for marketing and public relations purposes such as where we mention you in the context of Flexsys projects and initiatives in our marketing materials, social media posts and press releases	<ul style="list-style-type: none"> • Contact Information • Employment Administration Information 				✓	
48.	Administering your travel and accommodation arrangements	<ul style="list-style-type: none"> • Travel and Expenses Information 		✓ (✓ for Brazil)	✓	✓	
49.	Supporting and maintaining our technology infrastructure	<ul style="list-style-type: none"> • Asset, Systems and Platform Usage and Communications Information 		✓		✓	

	Purposes of processing	Categories of personal data	Lawful basis We are permitted to process your personal data because...				
			You have given your consent to the processing	It is necessary to perform your employment contract (in Germany: as necessary for purposes of the employment relationship)	It is necessary for us to comply with a legal obligation	It is necessary for our legitimate interests or those of third parties (as permitted by local laws)	It is necessary to protect your vital interests (or those of someone else)
		<ul style="list-style-type: none"> Security, Location and Access Information 					
50.	Supporting the sale, transfer or merging of part or all of our business or assets, or in connection with the acquisition of or by another business (Note: please also see Schedule 3)	<ul style="list-style-type: none"> Potentially all categories of information 			✓	✓	

SCHEDULE 3

SENSITIVE INFORMATION – PROCESSING ACTIVITIES AND LAWFUL BASIS

Not applicable in Brazil.

Purposes of processing		Sensitive Information – lawful basis					
		We are permitted to process your personal data because...					
		You have given your explicit consent to the processing (as required by local laws)	It is necessary for your/our obligations and rights in the field of employment and social security and social protection law	It is necessary to protect the vital interests of the data subject or another person you or they are physically or legally incapable of giving consent	It is necessary for our establishment, exercise or defence of legal claims	It is necessary for reasons of substantial public interest (as permitted by local laws)	It is necessary for preventive or occupational medicine , for the assessment of the working capacity of the employee
a) Recruitment and workforce planning							
1.	Conducting verification and vetting, including criminal background checks and credit checks where required by law		✓			✓	
2.	Conducting background checks, verification and vetting which are not required by law but needed by us to assess your suitability for your role	✓				✓	
b) General employment management and administration							
3.	Facilitating the administration of any private healthcare, life assurance/insurance, pensions initiatives and plans that we offer in connection with your employment with us		✓			✓	
4.	Managing our health and safety compliance obligations		✓			✓	
5.	Managing absence records, contractual sick leave entitlement and administering related payments		✓			✓	

6.	Managing maternity, paternity, adoption, parental and		✓			✓	
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Purposes of processing		Sensitive Information – lawful basis					
		We are permitted to process your personal data because...					
		You have given your explicit consent to the processing (as required by local laws)	It is necessary for your/our obligations and rights in the field of employment and social security and social protection law	It is necessary to protect the vital interests of the data subject or another person you or they are physically or legally incapable of giving consent	It is necessary for our establishment, exercise or defence of legal claims	It is necessary for reasons of substantial public interest (as permitted by local laws)	It is necessary for preventive or occupational medicine , for the assessment of the working capacity of the employee
	dependants leave and (where applicable) pay						
7.	Contacting the appropriate person in the event of an emergency concerning you			✓			
8.	Administering our insurance policies		(✓ for Brazil)				
9.	Determining whether any adjustments are necessary to enable you to carry out your role		✓			✓	
10.	Preparing risk assessments to prevent future injuries in the workplace		✓			✓	
c) Security and governance							
11.	Identifying and authenticating employees and other individuals	✓				✓	
12.	Identifying, investigating and mitigating suspected misuse of Flexsys's assets, systems and platforms				✓		
d) Legal and regulatory compliance and responsibilities							
13.	Managing and administering our equal opportunities reporting					✓	
14.	Responding to binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement				✓		

		Sensitive Information – lawful basis					
		We are permitted to process your personal data because...					
Purposes of processing		You have given your explicit consent to the processing (as required by local laws)	It is necessary for your/our obligations and rights in the field of employment and social security and social protection law	It is necessary to protect the vital interests of the data subject or another person you or they are physically or legally incapable of giving consent	It is necessary for our establishment, exercise or defence of legal claims	It is necessary for reasons of substantial public interest (as permitted by local laws)	It is necessary for preventive or occupational medicine , for the assessment of the working capacity of the employee
	bodies and authorities or sharing information (on a voluntary basis) with the same						
15.	Responding to non-binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities	✓			✓		
16.	Complying with disclosure orders arising in civil proceedings				✓		
17.	Investigating, evaluating, demonstrating, monitoring, improving and reporting on Flexsys's compliance with relevant legal and regulatory requirements				✓		
18.	Investigating, evaluating, demonstrating, monitoring, improving, reporting on and meeting Flexsys's compliance with best practice and good governance responsibilities	✓			✓		
19.	Responding to employment and industrial relations matters where permitted by applicable law, including criminal investigations, grievances,				✓		

		Sensitive Information – lawful basis					
		We are permitted to process your personal data because...					
Purposes of processing		You have given your explicit consent to the processing (as required by local laws)	It is necessary for your/our obligations and rights in the field of employment and social security and social protection law	It is necessary to protect the vital interests of the data subject or another person you or they are physically or legally incapable of giving consent	It is necessary for our establishment, exercise or defence of legal claims	It is necessary for reasons of substantial public interest (as permitted by local laws)	It is necessary for preventive or occupational medicine , for the assessment of the working capacity of the employee
	arbitrations, negotiations, elections and strikes						
e) Day-to-day business operations							
20.	Supporting our diversity programmes and staff support networks and initiatives	✓					
21.	Supporting the sale, transfer or merging of part or all of our business or assets, or in connection with the acquisition of or by another business	✓					

SCHEDULE 4

YOUR RIGHTS IN RELATION TO PERSONAL DATA

Our employees working in our Turkish subsidiaries will have the rights set forth under Article 11 of the Turkish Personal Data Protection Law.

If any of the personal information you have given to us changes, such as your contact details, please contact a local Human Resource representative.

Your right	What does it mean?	Limitations and conditions of your right
Right of confirmation and access	Subject to certain conditions, you are entitled to receive confirmation that your personal data is being processed by us, and have access to your personal data (this is more commonly known as submitting a " data subject access request ").	<p>If possible, you should specify the type of information you would like to see to ensure that our disclosure is meeting your expectations.</p> <p>We must be able to verify your identity. Your request may not impact the rights and freedoms of other people, e.g. privacy and confidentiality rights of other staff, or hamper legal or administrative procedures.</p>
Right of information	Subject to certain conditions, you are entitled to request information about the third parties with whom we have shared your personal data.	This right is limited by the company's commercial and industrial secrecy, as well as the compliance with legal obligations that impose confidentiality.
Right to data portability	Subject to certain conditions, you are entitled to receive the personal data which you have provided to us and which is processed by us by automated means, in a structured, commonly-used machine readable format.	<p>If you exercise this right, you should specify the type of information you would like to receive (and where we should send it) where possible to ensure that our disclosure is meeting your expectations.</p> <p>This right only applies if the processing is based on your consent or on our contract with you and when the processing is carried out by automated means (i.e. not for paper records). It covers only the personal data that has been provided to us by you. This exception is not applicable in Brazil.</p>
Rights in relation to inaccurate personal or incomplete data	<p>You may challenge the accuracy or completeness of your personal data and have it corrected or completed, as applicable. You have a responsibility to help us to keep your personal information accurate and up to date.</p> <p>We encourage you to notify us of any changes regarding your personal data as soon as they occur, including changes to your contact details, telephone number, immigration status.</p>	<p>Please always check first whether there are any available self-help tools to correct the personal data we process about you.</p> <p>This right only applies to your own personal data. When exercising this right, please be as specific as possible.</p>
Right to object to or restrict our data processing	Subject to certain conditions, you have the right to object to or ask us to restrict the processing of your personal data.	<p>As stated above, this right applies where our processing of your personal data is necessary for our legitimate interests.</p> <p>You can also object to our processing of your personal data for direct marketing purposes.</p>

Right to request the revision of exclusively automated decisions	When applicable, you have the right to request the review of decisions made solely based on automated processing of personal data affecting your interest (including profiling). We will provide you with clear and adequate information about the criteria used on the automated decision process, so you may understand how it was obtained.	This right is limited by the company's commercial and industrial secrecy.
Right to erasure	Subject to certain conditions, you are entitled to have your personal data erased, blocked or anonymized (also known as the " right to be forgotten "), e.g. where your personal data is no longer needed for the purposes it was collected for, or where the relevant processing is unlawful.	We may not be in a position to erase your personal data, if for example, we need it to (i) comply with a legal obligation, or (ii) exercise or defend legal claims.
Right to withdrawal of consent	As stated above, where our processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. Under the Brazilian legislation, you have the right to learn the consequences of refusing to consent to data processing activities.	If you withdraw your consent, this will only take effect for future processing.
Right to lodge complaints	You have the right to lodge complaints with how we process your personal data with us and/or with the relevant data protection authority in your jurisdiction.	If you wish to make a complaint about how we process your personal data, please contact the Privacy Office at privacy@flexsys.com . This is without prejudice to your right to lodge a complaint with the relevant data protection authority.

Updated 10/24/2023.