# **Privacy Statement Cimpor Global Holdings B.V.**

Personal data is processed in the context of the products offered and services provided by Cimpor Global Holdings B.V. ("CIMPOR Global"). The concept of 'personal data' includes all information about an identified or identifiable natural person. With regard to such processing of your personal data, CIMPOR Global qualifies as the data controller in the meaning of the <u>General Data Protection Regulation</u> (EU) 2016/679 ("GDPR"). You will find our contact details below:

CIMPOR Global Holdings B.V. Parnassusweg 819
1082 LZ Amsterdam
The Netherlands
<a href="mailto:privacy@cimporglobal.com">privacy@cimporglobal.com</a>
+31 (0)23-3038800

## Which personal data does CIMPOR Global process?

### Clients

CIMPOR Global may process the following (categories of) personal data of **clients** and their contact persons:

- Name and address details (name, first names, initials, titles, gender, address, postal code, residence) as provided by the client;
- Other contact details (company name, function, telephone number, e-mail address and similar data required for communication) as provided by the client;
- Data obtained from a public source (such as the Commercial Register, the Chamber of Commerce and the Land Register);
- Data for the purpose of calculating and recording fees and expenses, making payments and recovering claims, including the bank account number provided by the client;
- Other data of clients of which the processing is required by or necessary to comply
  with applicable laws or regulations, such as, under certain circumstances, the
  processing of certain data relating to proof of identity as provided by the client or
  obtained from a public source.

# Suppliers

CIMPOR Global may process the following (categories of) personal data of persons from whom CIMPOR Global purchases products or services or who work for these **suppliers**:

- Name and address details (name, first names, initials, titles, gender, address, postal code, residence) as provided by the supplier;
- Other contact details (telephone number, e-mail address and similar data required for communication) as provided by the supplier;
- Data for the purpose of placing orders or purchasing services; calculating and recording fees and expenses and making payments, including the bank account number as provided by the supplier;

Other data of suppliers of which the processing is required by or necessary to comply
with applicable laws or regulations as provided by the supplier or obtained from a public
source.

## Job applicants

When you apply to CIMPOR Global, e.g. via LinkedIn or by e-mail, we will process your personal data in order to deal with your application. If you apply for a job vacancy through our website, you will be asked to complete an online form listing the details needed to consider your application. You can also upload your CV and your cover letter.

In dealing with your job application, we may process the following data:

- Name and address:
- Contact details, including telephone number and email address;
- Date of birth;
- Educational attainment;
- Availability;
- Content of your CV;
- · Cover letter with your reasons for applying;
- Assessment and personality test results.

## Third parties

CIMPOR Global may process the following (categories of) personal data of **third parties** (such as visitors to our website):

- Contact details (name, first names, initials, titles, gender, address, post code, city), if provided;
- Other contact details (telephone number, e-mail address and similar data required for communications), if provided;
- Information collected on visits to our website <u>www.cimporglobal.com</u> including IP-address, as specified in our Cookie Statement;
- Data regarding electronic messages from or intended for third parties and data required to keep in touch with those third parties;
- Other data obtained from public sources or provided by clients, e.g. in light of dispute resolution.

### Newsletters or invitations

We may process the following categories or personal data when you receive our **newsletters or invitations** to, for example, one of our events:

- Your e-mail address:
- Whether or not you received an CIMPOR Global newsletter or invitation;
- Whether or not you opened the newsletter or invitation (open ratio) and the activity 'in' the newsletter or invitation (click ratio), which website pages you visited via the links in the newsletter or invitation and the name of the campaign in question (e.g. which newsletter or event);

- An internal e-mail ID number. On the basis of this ID number we can find out which CIMPOR Global newsletter or invitation you opened;
- The time at which the newsletter or invitation was opened;
- The e-mail client you use (the computer program you use to receive and send e-mails, e.g. Outlook, Apple Mail or Gmail).

# On the basis of which legal processing grounds and for which purposes does CIMPOR Global process your personal data?

CIMPOR Global processes your personal data on the basis of one or more of the following legal processing grounds:

- a) If this is necessary for the performance of an agreement to which you are a party or to perform precontractual acts at your request;
- b) If this is necessary to comply with statutory obligations;
- c) If this is necessary to justify our legitimate interests or the interests of a third party;
- d) Your consent.

If CIMPOR Global processes your personal data on the basis of your consent, CIMPOR Global will ask you for it separately. You may withdraw your consent at any time. CIMPOR Global draws your attention to the fact that the withdrawal of your consent does not affect the lawfulness of the processing of your personal data prior to the withdrawal of your consent.

CIMPOR Global uses the above personal data for the purposes stated below, in respect of which we have indicated for each purpose on the basis of which of the abovementioned legal processing grounds (a through d) CIMPOR Global does so. If the processing is based on the principle of 'legitimate interest', we briefly explain this interest. If you have any specific questions in this respect, please do not hesitate to contact us.

Purposes with corresponding processing grounds:

- to provide the requested products and services, including identifying the client (a, b and c: being able to offer and improve our services);
- for the administration of CIMPOR Global, including the calculation or recording of fees
  or benefits, income and expenses, the payment and collection of claims (including the
  use of collection agencies or bailiffs) (a, b and c: the importance of keeping proper
  records);
- to be able to deal with any complaints and disputes about our products and services (a, b and c: to defend rights, to maintain and improve existing relationships by means of proper handling of complaints and to improve the quality of our services);
- to provide you access to our website, to generate statistics regarding the use of our website, to analyse and improve our website and for the security of our website (a, b and c: our interest to offer a properly functioning website);
- to maintain contact and communicate with you which also includes communication for marketing purposes, relationship management and business development activities such as invitations for events and sending newsletters and other marketing communication that might be relevant to you (a, b, c: the interest in bringing CIMPOR Global's products and services to the attention of existing clients, d: consent if we do

not yet have a client relationship but, for example, you registered for one of our newsletters);

- to handle your job application, more specifically for:
  - Recruitment and selection;
  - o Assessment of suitability for a position with CIMPOR Global;
  - Dealing with any expenses incurred;
  - Internal checks and business security service;
  - Improving job application procedure;
  - o Dealing with questions, comments and complaints;
  - o Analysing and reporting on questions, comments and complaints;
  - o Regulatory compliance and compliance with court orders.

(a, b, c: our legitimate interest in assessing whether you are suitable for the job opening and d: consent if you wish to remain in our portfolio, see the header: "How long does CIMPOR Global retain your personal data?");

- for placing orders or purchasing services (a, b and c: our interest in being able to keep proper records);
- for conducting audits and other internal controls (a, b and c: our interest in being able to keep proper records);
- to comply with our legal and statutory obligations (b, c: the interest of being able to meet these obligations).

# To whom does CIMPOR Global provide your personal data?

CIMPOR Global does not provide your personal data to third parties ('recipients' within the meaning of the applicable privacy legislation), unless this is necessary for the proper performance of the purposes set out in this Privacy Statement, if the law requires us to do so or if you have provided your consent to this end. The third parties to whom the personal data are made available are obliged to handle your personal data confidentially. If these parties qualify as a 'data processor' within the meaning of the applicable privacy legislation, CIMPOR Global will ensure that a data processing agreement is concluded with these parties, which complies with the requirements included in the GDPR. E.g. CIMPOR Global may use the services of outside contractors such as the provider of the recruitment and selection system and the system for paying the expense allowance for its selection procedure.

Third parties which offer services to CIMPOR Global as an independent data controller, such as accountants, civil law notaries and experts engaged to provide an opinion or export report, are themselves responsible for the (further) processing of your personal data in accordance with the applicable privacy legislation.

CIMPOR Global can share personal data of clients, suppliers, job applicants and third parties with:

- Suppliers (for example software suppliers, bailiffs, courier services, translation agencies, accountants, etc);
- CIMPOR Global's subsidiaries:
- Courts and government institutions;

- With all of our legal successors if CIMPOR Global is acquired by or merged with another company and also with third parties involved in such proposed or actual business transaction;
- Situations may also occur in which we have a statutory obligation to disclose your personal data to third parties. For example, the police may require us to provide data pursuant to a judicial warrant;
- Other parties with your consent.

In order to provide our services, CIMPOR Global might need to transfer your personal data to a recipient in a country outside the European Economic Area with a lower degree of protection of personal data than the European Union law offers. In that case, CIMPOR Global will ensure that such a transfer of personal data is in accordance with the applicable laws and regulations, for example by concluding a model contract prepared and approved for that purpose by the European Commission and will assess whether any additional measures are necessary to guarantee an appropriate level of protection of your personal data. Please do not hesitate to reach out to CIMPOR Global if you wish to receive more information about the appropriate or suitable safeguards in place for data transfers outside of the European Economic Area or if you would like to obtain a copy of them.

# How long does CIMPOR Global retain your personal data?

CIMPOR Global does not retain your personal data in an identifiable form for longer than is necessary to achieve the purposes included in this Privacy Statement. More specifically, CIMPOR Global applies the following retention periods:

- The personal data you provide to CIMPOR Global for your application will be retained for up to four weeks after the end of the application procedure. With your consent, we will retain your personal data in our portfolio up to one year after termination of the application process. This will give us the possibility to contact you for possible future job openings at CIMPOR Global. Personal data that you have provided in the context of your application will become part of your personnel file when you start working for CIMPOR Global.
- Personal data that must be kept on the basis of Article 52 of the Dutch State Taxes
   <u>Act</u> will be kept for 7 years (from the end of the year in which the data in question have
   lost their current value for the (tax-) related business operations) in connection with the
   tax retention obligation incumbent on CIMPOR Global pursuant to Article 52(4) of the
   Dutch State Taxes Act.

The abovementioned specific retention periods can be extended if statutory retention obligations apply or will become applicable. CIMPOR Global may also retain the personal data for a longer period of time if this is necessary for the handling of incidents and/or legal disputes. For more information regarding the retention periods related to the use of cookies, we kindly refer you to our Cookie Statement.

### Security

CIMPOR Global has taken appropriate technical and organisational measures to secure your personal data against unauthorised or unlawful processing and against loss, destruction, damage, modification or publication. If you have any questions about the security of your

personal data, or if you suspect or see signs of misuse, please contact us via <a href="mailto:privacy@cimporglobal.com">privacy@cimporglobal.com</a>.

# Your privacy rights

You have the following rights in respect of the processing of your personal data by CIMPOR Global:

- the right to request whether CIMPOR Global processes your personal data and if so, the right to access your personal data and to receive information about the processing of your personal data;
- the right to rectification of your personal data if these are incorrect or incomplete;
- the right to have your personal data deleted ('right to be forgotten');
- the right to object to the processing of your personal data or to limit the processing of your personal data;
- the right to withdraw your consent for the processing of your personal data, if the processing is based on your consent;
- the right to receive or surrender your personal data to a third party appointed by you in a structured, customary and machine-readable form ('right to data portability').

CIMPOR Global does not use automated decision-making within the meaning of Article 22 GDPR.

To exercise your rights, you can contact us via <a href="mailto:privacy@cimporglobal.com">privacy@cimporglobal.com</a> or by regular mail via the contact details as stated at the beginning of this Privacy Statement.

In order to prevent that CIMPOR Global discloses information to the wrong person, CIMPOR Global can ask you for additional information to verify your identity. In principle, CIMPOR Global will inform you of whether CIMPOR Global can comply with your request, within one month after receipt. In specific cases, for example when it concerns a complex request, this term may be extended by two months. CIMPOR Global will inform you of such an extension within one month after receiving your request. On the basis of the applicable privacy legislation, CIMPOR Global can refuse your request under certain circumstances. If this is the case, CIMPOR Global will explain to you why. You can find more information about your privacy rights on the website of the <u>Dutch Data Protection Authority</u>.

# Complaints

If you have a complaint about the processing of your personal data by CIMPOR Global, we will be happy to work together to find a solution. If this does not lead to the desired result, you will have the right to file a complaint with the competent supervisory authority. In the Netherlands, this is the <u>Dutch Data Protection Authority</u>. If you live or work in another country of the European Union, you can file a complaint with the supervisory authority of that country.

# **Amendments**

CIMPOR Global reserves the right to amend this Privacy Statement. The most recent version of this Privacy Statement will always be posted on the website <a href="www.cimporglobal.com">www.cimporglobal.com</a>. If substantial amendments are made that could have a significant impact on one or more of the data subjects involved, we will try to inform these data subjects of this directly.