

## I. PURPOSE:

This data protection policy governs the collection, storage and use of personal information (also called “personal data”) collected by us, Chemviron. It provides you with details on the personal information we collect from you, how and why we use your personal information and your rights to control your personal information in our possession.

## II. POLICY

This data protection policy was last updated on 25 May 2018. Please check our website regularly to stay informed of updates to this data protection policy: [www.chemviron.eu](http://www.chemviron.eu).

### 1. Who we are:

**Chemviron S.A.** is a limited liability company (“*société anonyme*”) under Belgian laws with registered office at Parc Industriel de Feluy, zone C, 7181 Feluy (Seneffe), Belgium bearing number 0663.915.609 in the Legal Person Register (*RPM*) and registered with the Commercial Court of Hainaut, Charleroi Division, (hereinafter “**Chemviron**” or “**we**”).

This policy reflects the personal data protection practices and policies of Chemviron S.A., as **Data Controller**, i.e. the legal entity making the decisions about the purposes and means of the processing of your personal data. As Chemviron is part of a group of undertakings, including subsidiaries and affiliates as listed below in section 4, it may be that you are in contact with a different legal entity. However, only the present data protection policy applies, as far as the processing of your personal data is concerned, and Chemviron S.A. is the entity accountable, without prejudice to your rights under the applicable data protection laws.

We respect your right to privacy and data protection and will only process personal information you provide to us in accordance with applicable data protection laws and as described in this policy (Applicable data protection laws include (i) the General Data Protection Regulation (Regulation 2016/679) (“**GDPR**”); and (ii) all other existing or new applicable laws relating to or impacting on the processing of information of a living person and privacy).

If you have any questions about how we collect, store and use your personal information, or if you have any other data protection-related questions, please email us at [dataprotection.ccc@kuraray.com](mailto:dataprotection.ccc@kuraray.com).

We do not and will not knowingly collect information from any unsupervised child under the age of 16.

### 2. The personal information we collect about you and the purposes for which we collect it:

Below is an overview of:

- the categories of personal data that we, or third party data processors acting on our behalf, may collect (for further information on data processors acting on our behalf, see below under point 4), use and store about you;
- the purposes for which this information would be collected;
- the legal basis for the processing of your personal data.

*The personal data we collect about you in general during day-to-day professional activities*

During day-to-day business activities and correspondence in the course of trade, we may collect the following information from you, as (existing or potential): customer, consultant, supplier, vendor, agent distributor, as an employee or as a representative of Chemviron's such commercial partners (and affiliates) and other stakeholders, such as governmental bodies, authorities, certification bodies, etc. ("**Partners**"):

- Contact details\* e.g. name, address;
- E-mail address\*;
- Phone & fax number\*;
- Name of employer and professional title;
- Communications e.g. e-mails;
- Phone call (voice mail) messages;

*\* Professional, unless you give us your personal ones for the purposes mentioned in this policy.*

Specifically relating to **job applicants**, we may collect contact details (name, address, phone number, email address), assessment forms, CV's, references, social media account details (e.g.: LinkedIn), background checks (e.g.: confirmation of qualifications) and interview notes.

Please be advised that we may collect CCTV video footage on certain of our sites. We ensure that all individuals are made aware of such footage by a sign at the entrance of the property and we confirm that we comply to all applicable CCTV footage regulations.

### 3. How and why we may store and use your information

We (or third party data processors acting on our behalf) may collect, store and use personal information listed above for the following purposes:

- **Customers (as well as end users of our products and intermediaries involved in the sale, shipment or processing of Chemviron's products, in some cases) (whether actual or prospects):** (1) managing the (existing, future or potential) business relationship; (2) performing obligations or enforcing rights in relation to the contractual or business relationship; (3) performing obligations, enforcing or defending rights or interests in relation to the contractual or business relationship between Chemviron and a third party; (4) performing any legal obligation, including abiding by or enforcing an order from a court or from a governmental body or authority.

Specifically, but without limitation, the processing of the personal data of the employee or representative of the (existing, future or potential) customer is necessary in order to:

- assess the interest and needs in Chemviron's products and services via direct marketing activities or otherwise, including data analytics, personalization of products or services, and sending direct communications with your prior approval or as authorized under the applicable laws;
- initiate or reply to a request, enquiry or any type of communication with the customer, or said end user or intermediary;
- process / execute any document or underlying transaction, operation, project or task pertaining to the business relationship or contractual terms existing between Chemviron and the customer, such as the contract itself, purchase orders, delivery, shipment or customs, invoices, etc.;

- certify, qualify, manage the services provided and/or products supplied or underlying processes;
  - organize meetings with representatives;
  - negotiate contractual terms;
  - participate to public or private tenders;
  - provide information to a potential acquirer of Chemviron's business, assets, interests, under a confidentiality commitment;
  - support, substantiate the Chemviron's position, allegations, arguments, defense, conclusions, in disputes and legal proceedings involving the customer or any third party;
  - provide information to a certification body to certify or to apply for, manage or maintain the certification of Chemviron's products or processes;
  - perform background compliance checks, such as export and anti-bribery/corruption compliance;
  - market research and analysis of customers behaviour or preferences;
  - statistical research;
  - enhancing public and business relations – creation of goodwill;
  - to investigate, prevent or take actions against illegal activities, suspected fraud, situations involving potential threats to the physical or logical safety of any person, violations of our terms of use, or as otherwise required by law.
- **Suppliers / Vendors / Consultants (whether actual or prospects):** (1) managing the (**existing**, potential or future) business relationship with the supplier / vendor / consultant; (2) performing obligations or enforcing rights in relation to the contractual or business relationship with the supplier / vendor / consultant; (3) performing obligations, enforcing or defending rights or interests in relation to the contractual or business relationship between Chemviron and a third party; (4) performing any legal obligation, including abiding by or enforcing an order from a court or from a governmental body or authority.

Specifically, but without limitation, the processing of the personal data of the employee or representative of the supplier / vendor / consultant is necessary in order to:

- initiate or reply to a request, enquiry or any type of communication with the supplier / vendor / consultant;
- decide to hire or not the potential consultant prior to entering into a consultancy contract, whether at the request of the consultant candidate or at our own initiative or further to a reference;
- process / execute any document or underlying transaction, operation or task pertaining to the business relationship or contractual obligations with Chemviron such as the contract itself, purchase orders, delivery, shipment or customs, invoices, etc.;
- certify, qualify, manage the services provided and/or products supplied or underlying processes;
- organize meetings with representatives;
- negotiate contractual terms;
- participate to public or private tenders, when Chemviron intends to involve the supplier / vendor / consultant in the underlying contemplated transaction;

- provide information to a potential acquirer of Chemviron's business, assets, interests, under a confidentiality commitment;
  - provide information to a certification body to apply for, manage or maintain the certification of Chemviron's products, services or processes;
  - support, substantiate Chemviron's position, allegations, arguments, defense, conclusions, in disputes and legal proceedings involving the supplier / vendor / consultant or any third party;
  - perform background compliance checks, such as export and anti-bribery/corruption compliance;
  - to investigate, prevent or take actions against illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our terms of use, or as otherwise required by law;
  - use the technical commercial information pertaining to the business relationship;
  - enhancing public relations – creation of goodwill.
- **Agents / Distributors (whether actual or prospects):** (1) managing the business (existing, potential or future) relationship with the agent or distributor; (2) performing obligations or enforcing rights in relation to the contractual or business relationship with the agent or distributor; (3) performing obligations, enforcing or defending rights or interests in relation to the contractual or business relationship between Chemviron and a third party; (4) performing any legal obligation, including abiding by or enforcing an order from a court or from a governmental body or authority.

Specifically, but without limitation, the processing of the personal data of the employee or representative of the agent or distributor is necessary in order to:

- decide to appoint or not the potential agent or distributor prior to entering into an agency or distributorship contract;
- process / execute any document or underlying transaction, operation or task pertaining to the business relationship or contractual obligations with Chemviron such as the contract itself, purchase orders, delivery, shipment or customs, invoices, etc.;
- initiate or reply to a request, enquiry or any type of communication with the agent or distributor;
- certify, qualify, manage the services provided and/or products supplied and underlying processes;
- organize meetings with representatives;
- negotiate contractual terms;
- use the technical commercial information pertaining to the business relationship;
- participate to public or private tenders, when Chemviron intends to involve the agent or distributor in the underlying contemplated transaction;
- provide information to a potential acquirer of Chemviron's business, assets, interests, under a confidentiality commitment;
- support, substantiate the Chemviron's position, allegations, arguments, defense, conclusions, in disputes and legal proceedings involving the agent, distributor or any third party;
- give training regarding Chemviron's products, services, etc.;
- perform background compliance checks, such as export and anti-bribery/corruption compliance;

- to investigate, prevent or take actions against illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our terms of use, or as otherwise required by law;
- etc.
- **Certification bodies:** (1) managing the business relationship with the certification body in relation to the certification of Chemviro's products, services or processes; (2) performing obligations or enforcing rights in relation to the contractual or business relationship with the certification **body**; (3) performing obligations, enforcing or defending rights or interests in relation to the contractual or business relationship between Chemviro and a third party, for example Chemviro's customers, suppliers, vendors, consultants; (4) performing any legal obligation, including abiding by or enforcing an order from a court or from a governmental body or authority.

Specifically, but without limitation, the processing of the personal data of the employee or representative of the certification body is necessary in order to:

- process / execute any document or underlying transaction, operation or task pertaining to the business relationship or contractual obligations with Chemviro such as the contract itself, documentation related to Chemviro's product or processes, etc.;
- certify, qualify, manage the relevant services and/or products certified or for which a certification is sought or contemplated;
- initiate or reply to a request, enquiry or any type of communication with the certification body in relation to Chemviro's product, services or processes;
- organize meetings with representatives;
- negotiate contractual terms;
- participate to public or private tenders, when Chemviro intends to involve the certification body in the underlying contemplated transaction, or when such tender relates to a product, service or process for which Chemviro seeks, has sought or is contemplating applying for certification with the certification body;
- process / execute any document or underlying transaction, operation or task pertaining to the business relationship or contractual obligations between Chemviro and a third party such as customer of Chemviro, such as the contract itself, purchase orders, delivery, shipment or customs, invoices, etc., when such relates to a product, service or process for which Chemviro seeks, has sought or is contemplating applying for certification with the certification body;
- provide information to a potential acquirer of Chemviro's business, assets, interests, under a confidentiality commitment;
- support, substantiate the Chemviro's position, allegations, arguments, defense, conclusions, in disputes and legal proceedings involving any third party or partner of Chemviro, such as agent, distributor, customer, etc.
- give training regarding the certification or Chemviro's products, services, etc.
- **Governmental or public bodies or authorities:** (1) managing the relationship with the governmental body or authority, whether in relation to Chemviro's employees, business, sales, products, services, processes, know-how, assets, debts, liabilities, customers, business partners, **stakeholders**, shareholders, directors or otherwise ("**Chemviro's Business**"); (2) performing obligations or enforcing rights in relation to Chemviro's Business, including the payment or

collection of taxes, duties, contributions, rights, etc.; (3) performing any legal obligation, including abiding by or enforcing an order from a court or from a governmental body or authority.

Specifically, but without limitation, the processing of the personal data of the employee or representative of the governmental body or authority is necessary in order to:

- process / execute any document, order, request of the governmental body or authority in relation to Chemviron's Business;
  - initiate or reply to a request, enquiry or any type of communication with the governmental body or authority;
  - organize meetings with representatives of the governmental body or authority;
  - provide information to a potential acquirer of Chemviron's business, assets, interests, under a confidentiality commitment;
  - support, substantiate the Chemviron's position, allegations, arguments, defense, conclusions, in disputes and legal proceedings involving any third party or partner of Chemviron, such as agent, distributor, customer, etc.
- **Job applicants:** in order to take steps (decide to recruit or not) at the request of the employee candidate prior to entering into a potential employment contract.
  - **Visitors of our Sites:** to ensure the health and safety (including related containment measures) of our assets, employees and visitors.
  - **Visitors of website:** Please refer to our Cookies policy posted on our website: [www.chemviron.eu](http://www.chemviron.eu).

#### 4. With whom do we share your personal data ?

We will not disclose, sell or rent your personal information to any third party unless you have consented to this. If you do consent but later on change your mind, you may contact us and we will cease any such activity.

We may disclose your personal information where we are required to do so by applicable law, by a governmental body or by a law enforcement agency, agent or official.

We may also share your personal information within the network of our subsidiaries and affiliates, including, without limitation, the following ones :

- Chemviron Carbon GmbH (DE)
- Chemviron Carbon APS (DK)
- Chemviron France S.A.S. (FR)
- Chemviron Italia Srl (IT)
- Chemviron Carbon AB (SE)
- Chemviron Carbon Ltd. (UK)
- Charcoal Cloth International (UK)
- Charcoal Cloth Limited (UK)
- Lakeland processing limited (UK)
- Sutcliffe Croftshaw Ltd (UK)

- Sutcliffe Speakman Carbons Ltd (UK)
- Sutcliffe Speakman Ltd (UK)
- Sutcliffe Speakmanco5 Ltd (UK)
- Waterlink UK Holdings Ltd (UK)
- Chemviron Carbon, the French branch of Calgon Carbon Corporation (FR),

as well as with the holding companies Calgon Carbon Corporation and Kuraray Holding Co Ltd. and the latter's subsidiaries, all subject to section 6 below.

In accordance with the principles set out below, we will delete personal data once it is no longer required to fulfil the purposes outlined in this Data protection Policy, unless their retention would remain required for other fundamental purposes, including but not limited to complying with our legal obligations, handling claims and resolving disputes.

## 5. How long do we keep your personal data?

We will not store your personal data beyond the time necessary for the performance of the purposes for which the data is processed. Specifically, we distinguish between a retention period and an archiving period:

- The retention period is the maximum period of use of your personal data for specific purposes:
- the data processed for the performance of the contractual relationship or the performance of a legal duty is kept for the entire duration of the contract, or as long as the legal duty applies, and for the prescription period upon termination of the contract or of the legal obligation;
- the data processed for other purposes may be retained for a longer period that we cannot always determine in advance, but during which we will (i) regularly assess the need to keep this data or delete it, and (ii) protect that data by appropriate measures such as, when possible, pseudonymisation (depersonalization of the Personal Data where all traces leading to the individual are removed or made inaccessible but can be found somewhere else) and best, anonymization (irreversible depersonalization of the Personal Data where all traces leading to the individual are deleted).
- whenever we collect your personal data in a marketing context (e.g. exchange of business cards, leads, referrals or recommendations via existing customers, introduction at a fair, etc.) we will preserve your personal data for a limited period of twelve (12) months in order to explore the opportunities of a potential collaboration, to send you follow-up messages in a reasonable manner and to find out about your needs or requirements. Any personal data of such prospects that have not become customers or confirmed their consent to being further contacted by email after this time, will be deleted from our files.
- The archiving period meets our legal obligation as well as the legal need to retain your data beyond the retention period for evidentiary purposes, defence of our rights or to respond to requests for information from the competent authorities. Generally speaking, the archiving period is ten (10) years from the termination of a contractual relationship or following the close of the year during which the relevant event occurred. However different archiving periods may apply. Please refer to the Corporate Records Policy (LGL-08). More information may be obtained from [dataprotection.ccc@kuraray.com](mailto:dataprotection.ccc@kuraray.com).



## 6. International transfers

When we transfer personal data to third parties (be it data processors or separate data controllers, subsidiaries / affiliated companies, etc.) located in countries outside the European Economic Area, we will ensure that either (i) such countries provide an adequate level of protection under the applicable laws, (ii) or that appropriate safeguards are in place such as the standard contractual clauses issued by the European Commission (where applicable, Decision 2010/87/EU for the transfer of personal data from EU controller to processors established in third countries and Decision 2004/915/EC or 2001/497/EC for the transfer of personal data from EU controller to controllers established in third countries). A copy of the applicable safeguards can be obtained at [dataprotection.ccc@kuraray.com](mailto:dataprotection.ccc@kuraray.com).

## 7. Security

Chemviron has taken appropriate technical and organisational measures to safeguard the personal information that you provide us with, against unauthorized or unlawful processing and against accidental destruction, loss or damage.

## 8. Your rights

As a “Data Subject” under the applicable data protection laws, you have the following rights:

- a. the right to access to personal information that we hold about you;
- b. the right to ask us to update or correct any out-of-date or incorrect personal information that we hold about you;
- c. where the processing is based on your consent, the right to withdraw consent at any given time, without affecting the lawfulness of processing based on consent before its withdrawal;
- d. the right to erasure where the conditions of article 17 of the GDPR have been met;
- e. the right to restriction of processing where the conditions of article 18 of the GDPR have been met;
- f. the right to data portability insofar as the conditions of article 20 GDPR apply to you;
- g. the right to object to processing of personal data concerning you, insofar as the conditions under article 21 GDPR have been met;
- h. the right to lodge a complaint with a supervisory authority; and
- i. the right to opt out of any direct marketing communications that we (with your consent) may send you.

(With the exception of section 8(h) of this policy), you can exercise these rights at any given time by emailing us at [dataprotection.ccc@kuraray.com](mailto:dataprotection.ccc@kuraray.com)