

PRIVACY NOTICE

Latest amendment and revision: 16 July 2025

At Sumitomo Chemical Europe N.V./S.A. (hereinafter “**SCE**”, “**we**” or “**us**”), we value your privacy and we want to be transparent about the information we collect, why we collect it and how such information is used. For the personal data that are collected via this website, Sumitomo Chemical Europe SA/NV is the data controller.

We confirm that personal data are dealt with in accordance with the Belgian, European, and other relevant privacy laws and regulations if any, including the General Data Protection Regulation EU 2016/679 of 27 April 2016 (“**GDPR**”).

1. APPLICABILITY OF THIS PRIVACY NOTICE

1.1. This Privacy Notice (“**Notice**”) applies to the processing of personal data that we may collect from you or that you may provide when you:

- i. visit our website available at www.sumitomo-chemical.eu (“**Website**”);
- ii. engage with us via the ‘Contact us’ page on our Website, or via other means (eg. telephone or email);
- iii. contact or interact with us in relation to the provision of goods or services;
- iv. submit a job application and participate to our recruitment process via the “Careers” page on our Website.

1.2. Our Website may include links to third-party websites, plug-ins, services, social networks or applications. Clicking on those links or enabling those connections may allow the third party to collect or share data about you. We do not control these third-party websites, and we encourage you to read the privacy notice of every website you visit.

1.3. Please read this Notice carefully to understand when and how SCE collects, processes and protects your personal data. This Notice may be updated from time to time according to the applicable laws, regulations We therefore recommend you to periodically read this Notice. In case of questions, you can contact us via SCE-DPO@sumitomo-chemical.eu.

2. PERSONAL DATA WE MAY COLLECT ABOUT YOU

2.1 Personal data is defined as any information relating to an identified or identifiable natural person (“**Data Subject**”) and includes, without being limited to your name, your address, your email address, phone number and any other information you provide to us.

2.2 Your personal data are solely used by us for the purposes as defined in the table below and relate to the conduct of our business and processing your requests.

3. HOW WE USE YOUR PERSONAL DATA

We rely on one or more of the following legal bases to collect and process your personal data:

- i Performance of a contract with you: where we need to perform the contract we are about to enter into or have entered into with you.
- ii Our legitimate interests: we may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- iii Compliance with our legal obligations: we may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- iv Your consent: we rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose.
- v In pursuance of public or vital interest.

4. PURPOSE FOR WHICH WE USE YOUR PERSONAL DATA

4.1 Below we list the legal bases for how we use your personal data:

Purpose	Type of data	Legal basis
To register you and manage our relationship with you as a customer, supplier or partner, including (but not limited to): to process and deliver orders; to manage, make and collect payments to or from you; to notify you about changes to our terms and conditions, privacy policy or other legal agreement; to deal with your requests, complaints and queries.	Communication Contact Financial Identity Transaction Usage	Performance of a contract Necessary for our legitimate interests (e.g., to make and collect payments, to manage our relationship with you, to recover debts, to study how you use our products/services, to develop and grow our business).
To administer and protect our business and this website (including troubleshooting, data analysis, testing, preventing abuse and spam, system maintenance, support, reporting and hosting of data)	Contact Identity Technical	Necessary for our legitimate interests (e.g., to run our business efficiently, to manage our IT infrastructure and network security, to prevent fraud) Necessary to comply with a legal obligation.

To deliver website content and online messages to you and measure or understand the effectiveness of the messages we serve to you	Identity Contact Profile Usage Communication Technical	Necessary for our legitimate interests (e.g., to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy).
To use data analytics to improve our website, products/services, customer, supplier or partner relationships and experiences and to measure the effectiveness of our communications and marketing	Technical Usage	Necessary for our legitimate interests (e.g., to define types of user for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).
To carry out market research	Communication Contact Identity Profile Technical Usage	Necessary for our legitimate interests (to study how customers use our products/services and to help us improve and develop our products and services).
To carry out our obligations as an employer and the management of workforce	Communication Contact Financial Identity Profile Technical Transaction Usage	Performance of a contract Necessary for our legitimate interests (e.g., pre-employment checks, to fulfil our obligations as an employer, monitoring the use of our IT infrastructure and protecting company's assets and rights, management of health, safety and security in our premises, litigation management, education, training and career development). Compliance with our legal obligations. Vital and public interest.
To process solicited and unsolicited job applications	Communication Contact Financial Identity Technical Transaction Usage	Necessary for our legitimate interests (e.g., to process job applications). Performance of a contract. Necessary to comply with our legal obligations. Consent.

4.2 In principle, we do not collect or use any special categories of personal data, such as health data or other sensitive types of data, unless you provide this to us voluntarily (either through the contact for on the Website or as part of your application or during an interview).

5. DISCLOSURE OF YOUR PERSONAL DATA

5.1 General

- i. We will never sell, rent or trade your personal data except if otherwise set forth in this Notice.
- ii. We may need to share your personal data, only where strictly necessary, with third parties, in line with the information as set out in the table above.
- iii. We will need to disclose your personal data to any third party to whom we sell, transfer or merge parts of our business or our assets. Alternatively, we may acquire other businesses or merge with them in which case your personal data will be disclosed to us. Such processing is necessary for SCE's legitimate interest in carrying out the said business transactions in order to implement our business strategies or grow our business. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this document.
- iv. We require all third parties to respect the security of your personal data and to treat it in accordance with the applicable law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instruction.
- v. We do not share your personal data with any third party for their own direct marketing purposes, but while using our website or network you might be redirected to or have access to third party website(s) where your personal data might be collected directly by them and in which they are the data controller.

5.2 We may, pursuant to valid legal process, such as a search warrant, subpoena, or court order, allow access to any information (including such categories of personal data) provided to SCE, in order to comply with such process and to protect our rights and property. If warranted, we may also allow access to this information in special emergencies where physical safety is at risk. We may also use your personal data for the purposes of combatting fraud and crime. In such instances, the processing of your personal data is based on SCE's legal obligation to comply with applicable laws and requests by competent authorities, as well as on SCE's legitimate interest to fight fraud and crime in general.

6. COOKIES

6.1 SCE uses cookies on the Website. To find out more about the cookies we use on the Website, please consult our cookie notice available at <https://www.sumitomo-chemical.eu/>.

7. RETENTION PERIOD

7.1 Your personal data related to your use of the Website and your engagement with us, shall be kept no longer than necessary for the above-mentioned purposes, or as long as permitted or required by the applicable laws, taking into account any statutory limitation or retention terms.

7.2 We will retain your personal data related to recruitment and job applications for a period of 1 year after the end of the application process. We may keep your application details for future job openings for a period of 3 years, if you have given us your consent thereto.

7.3 If your job application is successful, your personal data obtained in the context of the application and recruitment procedure will be included your personnel file. You will then be informed separately of how SCE processes personal data of its personnel.

8. DATA TRANSFERS AND USE OF YOUR PERSONAL DATA

8.1 We can transmit your personal data to third parties who reasonably need access to those data in view of achieving one or several of the above-mentioned purposes. We may in particular transfer your personal data to Sumitomo Chemical Company (“**SCC**”) in Japan or other affiliated companies of SCC for such purposes (together “**Sumitomo Group**”). Your personal data may also be transferred to any third parties to whom SCE subcontracts all or part of this processing. This may for instance include:

- i. service providers (including IT service providers), hosting providers, translation agencies, security companies, marketing agencies and subcontractors;
- ii. potential or future buyers of Sumitomo;
- iii. specifically with regard to personal data collected in the framework of our recruitment processes: (i) online recruitment platforms for the publication of new job openings and collection of applications; (ii) third party assessment providers, in case an external assessment is needed for a specific function and (iii) headhunting agencies (if applicable);
- iv. law enforcement and public authorities, in accordance with the applicable legislation;
- v. external professional advisors (e.g. auditors, lawyers or consultants of SCE).

8.2 Please note that some parties who receive your personal data may be located in a country outside the European Economic Area (EEA). In the event of transfer of personal data to a country outside of the European Economic Area where the European Commission has not found that the privacy laws ensure an adequate level of protection compared to the privacy laws of the EU, SCE may base the transfer on appropriate safeguards (e.g. putting in place the most recent EU standard contractual clauses on the processing of personal data, in accordance with the EU Commission model clauses; as well as other approved data transfer or certification mechanisms). In each instance, SCE will review the transfer and ensure that any additional technical and organizational measures are put in place to ensure that an adequate level of protection is provided. You can request more information about such measures (including copies where relevant) by getting in touch with SCE through the contact details set out below in Section 16 of this Notice.

9. DATA SECURITY

9.1 SCE has appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered, disclosed or made inaccessible. We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

9.2 SCE has procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

10. CLOSED-CIRCUIT TELEVISION (CCTV)

SCE uses camera surveillance (CCTV) on its premises for safety, security and property protection purposes. Only images will be collected, no match with personal identification data will be made unless required by law for investigation. Camera surveillance images are kept for thirty (30) days, after which they are deleted. The use of surveillance cameras, management of IT equipment, monitoring and litigation management is necessary to protect SCE’s legitimate interests for the purposes described in this Notice.

11. YOUR RIGHTS

11.1 Subject to applicable law, you may have some or all of the following rights in respect of your personal data. You can exercise these rights by submitting your request via email to SCE-DPO@sumitomo-chemical.eu.

11.2 Please include some means which enables us to verify your identity. If SCE has reasonable doubts concerning your identity, we may request you to provide additional information necessary to confirm your identity.

11.3 Please note that SCE may reject requests that are excessive or a misuse of the relevant right.

11.4 As a Data Subject, according to the GDPR, you have the following rights:

- **Access right.** You may have the right to obtain confirmation of whether SCE processes personal data in relation to you and, if so, gain access to a copy thereof.
- **Data portability.** In certain circumstances, you may also ask that we transmit the personal data you gave us to another organization, or to you.
- **Data accuracy: right of rectification and right to erasure.** You may have the possibility to rectify, complete or obtain the erasure of your personal data, provided that the applicable legal requirements are met. The right to erasure is subject to various exceptions, notably as regards personal data whose processing is necessary to support litigation or for compliance with statutory retention requirements.
- **Limits to processing: right to restriction, right to object & consent withdrawal.** In addition, you may have the right to object to the processing of personal data based on SCE's legitimate interests (see table above) and to otherwise obtain the restriction of certain forms of processing in specific circumstances. In particular, in relation to the processing of personal data for direct marketing purposes, you may have the right to object at any time thereto. Where any processing is based on consent, you may have the right to withdrawal such consent at any time (without this affecting the processing prior to the consent withdrawal).
- **Right to lodge a complaint with the supervisory authorities.** Please note that in case of issues, we encourage you to contact SCE directly in order to reach an amicable solution. However, if you believe an amicable solution cannot be reached, you have the right to lodge a complaint with the supervisory authority, that is competent for your place of residence, place of work or place of the alleged infringement. The contact details of such authorities in Europe can be found via the following link: https://edpb.europa.eu/about-edpb/about-edpb/members_en.

11.5 Unless otherwise indicated, the provision of personal data to SCE is not a statutory or contractual requirement and you are not obliged to provide your personal data to us. If you decide not to provide your personal data, we might, in some instances, not be able to provide you with all features of the Website, a product or service or allow you to participate to our recruitment procedures. Completion of any forms or surveys is entirely voluntary, although you may be required to submit certain personal data to SCE to allow us to adequately handle your inquiries or requests.

12. CHILDREN

SCE's services and Website are not directed or targeted towards children, and SCE does not knowingly collect information from Data Subjects under the age of 18 years old. If SCE learns that it has mistakenly or unintentionally collected or received personal data from a Data Subject under said age without appropriate consent, it will remove such information from its files. If you believe SCE mistakenly or unintentionally collected any information from or about a Data Subject under 18 years old, please contact us via SCE-DPO@sumitomo-chemicam.eu.

13. YOUR DATA

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

14. THIRD PARTY LINKS

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

15. USER'S ACKNOWLEDGMENT OF THIS NOTICE AND CHANGES TO THE NOTICE

8.1. By visiting this website, you acknowledge that you have (had the opportunity to) become familiar with SCE's Privacy Notice.

8.2. We reserve the right, at our sole discretion, to change, modify, add, or remove portions from this Notice at any time. We shall notify any such changes on this page. If the changes materially alter how we use or treat your personal data, we will notify you through a notice on the Website homepage. The modified Notice shall enter into force as of that last revision date referred to on top of this page.

16. CONTACT INFORMATION

If you have any questions about this Notice, including any requests to exercise your legal rights, please contact us at: SCE-DPO@sumitomo-chemical.eu.