

## **PRIVACY NOTICE**

Last modified: October 1 2022

At Sumitomo Chemical Europe N.V./S.A. (hereinafter “SCE”, “we” or “us”), we strive to honor the privacy and security of our users, customers and suppliers, as well as their representatives, in relation to all products and services, provided by SCE.

### **1. APPLICABILITY OF THIS PRIVACY NOTICE**

1.1. This privacy 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](http://www.sumitomo-chemical.eu) (“Website”);
- ii. engage with us via the ‘Contact us’ page on our Website, or via other means (eg. via telephone or email);
- iii. submit a job application and participate to our recruitment process via the “Careers” page on our Website.

1.2. The 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 our policies and practices for collecting and processing your personal data. This notice may change from time to time (see Section 8 of this privacy notice below). We therefore encourage you to periodically review this privacy notice. The last revision date is indicated at the beginning of the privacy notice.

### **2. PERSONAL DATA WE MAY COLLECT ABOUT YOU**

2.1 Please consult the table below to see which categories of personal data we may collect about you when using the Website or by otherwise engaging with us (apart from your participation in our recruitment procedures which is set out below in Section 2.2. of this privacy notice and for which purposes we process (use, store, etc.) such personal data, as well as the legal grounds for such processing.

<b>Purpose</b>	<b>Categories of personal data</b>	<b>Legal grounds</b>
Customer management	Identification data, electronic location data, electronic identification data, profession and job, professional contact details	Performance of a contract with the data subject (or undertaking the pre-contractual steps required to enter into such agreement)  To the extent SCE would not have a contract with the data

		subject (but, for example, with its employer) this processing will be based on our legitimate interest to perform such contract with the relevant customer.
Product development, improving the Website, testing, improvement, troubleshooting and in general improving your user experience	Identification data, electronic location data, electronic identification data	Legitimate interests of SCE in improving its products and services as well as its Website and general user experience
Ensuring network and information security	Identification data, electronic location data, electronic identification data	Legitimate interests of SCE in ensuring its network and information security, in particular by scanning any emails sent to us, including file attachments, for viruses or malicious software.
Answering and processing questions, communications or requests (e.g. submitted via the 'Contact' page)	Identification data, electronic location data, electronic identification data	Legitimate interests of SCE in replying to your queries and/or questions, as well as providing you with correct information about our products, services our organization in general.

2.2. Please consult the table below to see which categories of personal data we may collect about you when sending us job applications and participating to our recruitment process through the forms made available on the Website and for which purposes we process (use, store, etc.) such personal data, as well as the legal grounds for such processing and the relevant retention period.

Recruitment (identification and evaluation of, and communication with job applicants)	<p>Identification and contact information (including your name, first name(s), phone number, address, email address);</p> <p>Personal characteristics: your place and date of birth, nationality, age, language, gender;</p>	During the recruitment procedure, the processing of your personal data is necessary for SCE's legitimate interest in assessing your application in view of possible recruitment and to maintain our administration.
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	<p>The channel where you found the open position (a Sumitomo employee, a specific website etc.);</p> <p>Your photo if you provide this voluntarily (for instance included in your CV);</p> <p>Data related to your professional experience (profession, (previous) job(s), profile, data about previous employers, termination of last jobs and the work delivered, special projects, etc.) including a reference check if you supplied references in your CV;</p> <p>Data related to your education (diplomas, certificates, internships, specific training, etc.);</p> <p>Language skills;</p> <p>If applicable, whether or not you have a work/residence permit in the European Economic Area (EEA);</p> <p>Digital assessment via the internet (presence on social media), to the extent that this information is open for us;</p> <p>All other personal data (than the above-mentioned) that you choose to disclose to use during the course of the application process or that, according to the law, must be processed.</p>	<p>In addition, and in particular in case of a positive assessment and decision to hire you, the further processing of this category of personal data is necessary to undertake the required pre-contractual steps to enter into an agreement with the applicant and for the potential conclusion of an employment agreement or other agreement between you and SCE.</p>
<p>Storing the personal data in our central database for future reference</p>	<p>Same information as set out above under 'Recruitment'</p>	<p>If you are not retained for a position, we may keep your resume for future processing if you have consented thereto.</p>

2.3. 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).

2.4. In addition, 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.

2.5. SCE moreover reserves the right to disclose and transfer any information obtained from or about you to third parties in connection with a merger, acquisition, or sale of all or substantially all of SCE's assets. 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.

2.6. Except as otherwise set forth herein, we do not sell, trade, or rent your personal data with any third parties.

### **3. COOKIES**

Sumitomo uses cookies on the Website. To find out more about the cookies we use on the Website, please consult our cookie notice available [here](#).

### **4. RETENTION PERIOD**

4.1. 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.

4.2. We will retain your personal data related to recruitment and job applications for a period of 3 years 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.

4.3. 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.

### **5. DATA TRANSFERS AND USE OF YOUR PERSONAL DATA**

5.1. 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:

- service providers (including IT service providers), hosting providers, translation agencies, security companies, marketing agencies and subcontractors;
- potential or future buyers of Sumitomo;
- 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);
- law enforcement and public authorities, in accordance with the applicable legislation;
- external professional advisors (e.g. auditors, lawyers or consultants of Sumitomo).

5.2. 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 9 of this privacy notice.

## **6. YOUR RIGHTS**

6.1. 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 through the form available via [www.sumitomo-chemical.eu/contact](http://www.sumitomo-chemical.eu/contact) or any of the other contact details set out below in Section 9 of this privacy notice.

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

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

6.4. If the relevant conditions of the GDPR are met, 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.** You have the right to lodge a complaint with the supervisory authority, in particular the data protection authority that is competent for your place of residence, place of work or place of the alleged infringement. For Belgium, this is the Belgian Data Protection Authority ([www.dataprotectionauthority.be](http://www.dataprotectionauthority.be)).

6.5. 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.

## **7. CHILDREN**

SCE's services and Website are not directed or targeted towards children, and SCE does not knowingly collect information from children under 13. If SCE learns that it has mistakenly or unintentionally collected or received personal data from a child under 13 without appropriate consent, it will remove such information from its files. If you believe Sumitomo mistakenly or unintentionally collected any information from or about a child under 13, please contact us through any of the contact details set out below in Section 9 of this privacy notice.

## **8. USER'S ACKNOWLEDGMENT OF THIS NOTICE AND CHANGES TO OUR PRIVACY 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 privacy 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 home page. The modified privacy notice shall enter into force as of that last revision date referred to on top of this page.

## **9. CONTACT INFORMATION**

If you have any questions or comments regarding this document, or to exercise your data subject rights, preferably contact us using the form available via [www.sumitomo-chemical.eu/contact](http://www.sumitomo-chemical.eu/contact). Alternatively, you can also reach out to us by e-mail at [sce-contactform@sumitomo-chemical.eu](mailto:sce-contactform@sumitomo-chemical.eu) or by letter to Sumitomo Chemical Europe, Woluwelaan 57, 1830 Machelen, Belgium.