

Sumitomo Seika Europe S.A./N.V. PRIVACY POLICY

Last updated on 17 September 2020

At Sumitomo Seika Europe S.A./N.V. (hereinafter “SSE”), we endeavor to protect the privacy of our users, customers and suppliers, as well as their representatives, in relation to all products and services, provided by SSE (Woluwelaan 57, 1830 Machelen, Belgium).

PROCESSING OF YOUR PERSONAL DATA

1. Personal data concerns any information concerning an identified or identifiable natural person that is processed by SSE as described in article 2 of this Privacy Policy. SSE sometimes ask you to provide certain information, including, but not limited to, your name, title, company, address, phone number, e-mail address and line of business.

2. We process your personal data as specified below.

Purpose	personal data	Legal grounds	Retention period
Customer management & support, direct marketing	Identification data, electronic location data, electronic identification data, profession and job, professional contact details	Performance of a contract with the data subject (which may include the terms of use of the relevant product or service)	For the period required to serve the applicable purpose
Product development, testing, improvement and troubleshooting	Identification data, electronic location data, electronic identification data,	Legitimate interests of SSE in improving its products and services	
Direct marketing	Identification data, profession and job, device information, electronic identification data, professional contact details	Legitimate interests of SSE in promoting its products and services, or consent where and to the extent required in the case of electronic mail marketing	

3. SSE reserves the right to disclose any information obtained from or about you to third parties in connection with a merger, acquisition, bankruptcy or sale of all or substantially all of SSE’s assets.

4. Pursuant to valid legal process, such as a search warrant, subpoena, or court order, SSE may allow access to any information (including such categories of personal data) provided to SSE, 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.

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

YOUR RIGHTS

6. 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 by getting in touch with SSE through the contact details in Article 9 of this Privacy Policy. Please include your personal details as well as some means of verifying your identity (e.g. showing us a copy of your identity card or passport by attaching it to an e-mail). Please note that SSE may reject requests that are excessive or a misuse of the relevant right.

6.1. Access right.

You have the right to request access to your personal data. This enables you to receive a copy of the personal data SSE hold about you. For certain kinds of data, you may also have a right to data portability.

6.2. Right of correction.

You have the right to request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.

6.3. Right to erasure.

You have the right to request deletion of your personal data. This enables you to ask SSE to delete 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.

6.4. Right to restriction, right to object & consent withdrawal.

In so far as the personal data processing is based on consent (see Article 2), you have the right to withdraw consent at any time (without this affecting the processing prior to the consent withdrawal). In addition, you may have the right to object to the processing of personal data based on SSE'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.

6.5. Right to lodge a complaint with the supervisory authorities.

In addition to the above mentioned rights you have the right to lodge a complaint with a supervisory authority, in particular in the EU Member State of your habitual residence, place of work or of an alleged infringement of the GDPR at all times. However, we would appreciate the chance to deal with your concerns before you approach the supervisory authority so please contact us beforehand.

6.6 Right to data portability:

you have the right to receive your personal data and transmit it to a third party.

DATA TRANSFERS

7. These categories of personal data may be transferred to other Sumitomo Seika Chemicals Company, Limited. (“SSC”) in Japan or other affiliated companies of SSC for such purposes, as well as to any third parties to whom SSE subcontracts all or part of this processing. This may for instance include service providers, hosting providers and any other relevant roles.

8. In the event of transfer of personal data to a country outside of the European Economic Area, SSE systematically ensures the application of an adequate level of protection of such personal data by approved means (e.g. putting in place standard contractual clauses on the processing of personal data, in accordance with the EU Commission model clauses). You can request more information about such measures (including copies where relevant) by getting in touch with SSE through the contact details above.

CONTACT DETAILS

9. For any questions, complaints or in the event that you wish to make use of one of the rights mentioned in this Privacy Policy, you may contact us at the contact details below:

Contact:

Sumitomo Seika Europe S.A./N.V.

Address:

Woluwelaan, 57 B-1830 Machelen, Belgium

Email: privacy@sumitomoseika-europe.be

USER’S ACKNOWLEDGMENT OF THIS POLICY

10. By visiting the Web Site, you acknowledge that you have (had the opportunity to) become familiar with SSE’s privacy policy.

11. We reserve the right, at our sole discretion, to change, modify, add, or remove portions from this privacy policy at any time. We shall notify any such changes in according with applicable data protection legislation.

Privacy Policy for Job Applicants

Last updated on 17 September 2020

This Privacy Statement is published by Sumitomo Seika Europe S.A./N.V. (“SSE”), with its registered seat at Woluwelaan 57, 1830 Machelen, Belgium.

SSE retains and processes a range of personal information, some of which relates to the individuals who apply to work for us. This Privacy Policy includes information about the personal information SSE processes about job applicants and third parties whose information is provided to us in connection with the application, such as references.

Please note that you acknowledge having read and understood this Privacy Policy when you submit your application or your resume.

This Privacy Policy sets out:

1. personal data we collect in the course of the application and recruiting process;
2. purpose and legal grounds of use of your personal data;
3. the personnel who has access to your personal data;
4. retention period of your personal data;
5. your rights about your personal data;
6. security of your personal data;
7. Inquiry.

1. Personal data we collect

This Privacy Policy relates to all personal data that we receive from you and that we collect and process about you in the context of your application and the resulting recruitment process.

The types of personal information we may collect or develop include:

- ◆ identification
- ◆ contact details
- ◆ personal characteristics (such as gender and date of birth)
- ◆ education and work experience (including results, certificates, degrees, references)
- ◆ job preferences and interests
- ◆ financial data (e.g. current and desired salary)
- ◆ all data in your resume and cover letter
- ◆ all publicly available data from social medias or public websites
- ◆ all other personal data you have provided to us orally or in writing in the context of your application.

2. Purpose and legal grounds of how we use of your personal data

We will use your personal data in the context of your application and recruitment process, including for:

1. administering the application process and assessing your skills, qualifications and suitability for the position, including information verification;

2. checking your data, your references and/or conducting background checks (where applicable);
3. communication concerning the recruitment process and your application;
4. implementing improvements to the application and recruitment process within SSE.
5. complying with regulatory rules to which we may be subject;

The processing for the purposes 1, 2 and 3 described above are necessary for the potential conclusion of an agreement between you and SSE and the processing for purpose 4 is based on the legitimate interest of SSE. Concerning purpose 5, processing is necessary for compliance with a legal obligation to which the controller is subject.

3. The personnel who has access to your personal data

Sumitomo Seika Chemicals Corporation, Limited (“SSC”) in Japan and SSE can access your personal data. Within these entities, the following staff members have access to your data:

- staff members of corporate department (HR etc.) and related business department;
- Members of management
- staff members of the IT department. In certain cases, technical staff members may have access to your personal data, but only insofar this is necessary to ensure the proper functioning of our technical systems.

SSE may use external service providers or third parties for any of the purposes described above (e.g. recruitment websites or agencies conducting background checks). In such case, we will limit access to your personal data to the purposes described in this Privacy Policy, and in accordance with the requirements of the applicable data protection legislation.

SSE takes steps to ensure that any data that is transferred will be protected in a manner that is compliant with applicable privacy laws and which satisfies any local legal obligations attached to the information in question (e.g. putting in place standard contractual clauses on the processing of personal data, in accordance with the EU Commission model clauses) when SSE transfers your personal data to SSC.

4. Retention period of your personal data

If your application is not successful, we will not retain your personal data after the end of the recruitment process.

If your 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 SSE processes personal data of personnel.

5. Your rights about your personal data

You have a legal right to access your personal data, to have them corrected, to have them erased, or to receive them in a structured, commonly used and machine-readable format that can be transferred to another party.

If you wish to exercise any of these rights, please contact our Administration or General Affairs Manager via privacy@sumitomoseika-europe.be and include a proof of identity.

You remain responsible for any personal data you provide and for the consequences of such action. Please note that you may not provide SSE with personal data in breach of obligations towards others relating to privacy, confidentiality, intellectual property or trade secrets, unless you have obtained explicit consent of the relevant person or entity to share these data with SSE for the purposes described in this Privacy Policy. By including references, you guarantee that you have informed the parties involved about the processing of their personal data as described in this Privacy Policy.

6. Security of your personal data

We take data security seriously. We have implemented technical and operational security measures in order to protect personal data from loss, misuse, alteration, or destruction.

Only authorized personnel of SSE and of our third party service providers are provided access to your personal data and such access is granted only to persons who need to have it in order to perform their tasks. These employees and third party service providers are bound with confidentiality obligations.

7. Inquiry

For questions, remarks or complaints regarding the processing of your personal data by SSE, you can contact:

Administration or General Affairs Manager (privacy@sumitomoseika-europe.be)

8. Changes to this Privacy Policy

We reserve the right to amend this Privacy Policy at any time without advance notice. We will post the revised Privacy Policy on the site or announce the change on the home page of the site. You can determine when the privacy Policy was revised by referring to the "Last Updated" legend on the top of this Privacy Policy.