

## RAVAGO S.A.

### EU Corporate Data Protection Policy

#### I. Objective

Ravago operates in a number of EU countries that are subject to data protection law on European and national level. The Ravago EU Corporate Data Protection Policy (“the Policy”) will provide a framework of general data protection rules and principles intended to achieve data protection compliance. This Policy applies to the processing of Personal Data related to any Data Subjects by Ravago. This Policy may be supplemented by additional notices, policies or implementation procedures, to the extent necessary, in the countries where Ravago operates.

#### II. Definitions

The following terms shall have the meanings as defined below:

“**Ravago**” or “**Ravago Group**” means Ravago S.A. and its affiliated companies directly or indirectly controlled by Ravago S.A.

“**Company**” means each legal entity belonging to the Ravago Group in the EU which has implemented this Policy.

“**Data Controller**” means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the Processing of Personal Data.

“**Data Processor**” means a natural or legal person, public authority, agency or any other body which Processes personal data on behalf of the Data Controller.

“**Data Protection Officer**” (“**DPO**”) means a person (either an Employee or an external consultant) designated by the Company as a DPO under mandatory rules of EU or EU Member State law, or a person who will be designated voluntarily. The DPO is responsible for tasks as set forth in the General Data Protection Regulation (“**GDPR**”), including monitoring the Company’s compliance with the GDPR, informing and advising the Company employees, providing advice regarding data protection impact assessments, and acting as contact point on issues relating to the Company’s processing of Personal Data.

“**Data Subject**” means an Employee, customer, vendor, other third parties or agent of the Company whose Personal Data Ravago Processes.

“**Personal Data**” means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

“**Processing**” means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### **III. Policy**

It is Ravago's policy, to process Personal Data responsibly and in compliance with applicable data protection laws in all countries in which Ravago operates and to maintain data protection management procedures and systems necessary to Process Personal Data in a lawful and responsible manner.

### **IV. Data Protection Principles**

The Company has adopted the following principles to govern its Processing of Personal Data, except as specifically provided by supplementary policies or as required by applicable laws or regulations.

Personal Data shall:

- i. only be Processed lawfully, fairly, and in a transparent manner in relation to the Data Subject ("lawfulness, fairness, and transparency");
- ii. be obtained only for specified, explicit, and legitimate purposes, and shall not be further Processed in any manner incompatible with those purposes ("purpose limitation");
- iii. be adequate, relevant, and not excessive in relation to the purposes for which they are Processed ("data minimization");
- iv. be accurate and, if necessary, kept current, as appropriate to the purposes for which they are Processed ("accuracy");
- v. not be kept in a form that permits identification of the Data Subject for longer than necessary for the permitted purposes ("storage limitation"); and
- vi. be Processed in a manner that ensures appropriate security of the Personal Data, including protection against unauthorized or unlawful Processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures ("integrity and confidentiality").

The Company shall be responsible for, and be able to demonstrate compliance with principles (i) to (vi) ("accountability").

Personal Data shall be Processed in accordance with the rights of the Data Subjects under applicable data protection laws and regulations. The procedures set out in Annex 1 hereto describe how the Company will respond to requests regarding Personal Data Processing.

### **V. Lawfulness of Data Processing**

Personal Data shall not be Processed unless one of the following legal bases applies:

- i. the Data Subject has provided a valid, informed consent for one or more specific purposes;
- ii. Processing is necessary for the performance of a contract to which the Data Subject is a party

or in order to take steps at the request of the Data Subject prior to entering into a contract;

- iii. Processing is necessary for compliance with a legal obligation;
- iv. Processing is necessary to protect the vital interests of the Data Subject; or
- v. Processing is necessary for legitimate interests of Ravago, or of the third party, or parties to whom the data are disclosed, except if such interests are overridden by the fundamental rights and freedoms of the Data Subject.

## **VI. Transparent Information to Data Subject**

The Company will take appropriate measures to provide any information required by information obligations vis-à-vis the Data Subject and any communication in relation to any rights of the Data Subject on Personal Data Processing under applicable data protection laws and regulations to the Data Subject in a concise, transparent, intelligible and easily accessible form, using clear and plain language. The information will be provided in writing, or by other means, including, where appropriate, by electronic means.

At a minimum, the Company will provide the Data Subject with the following information:

- i. the identity and the contact details of the Data Controller responsible for the data Processing;
- ii. the contact details of the DPO and/or the DPC, where applicable;
- iii. the purposes of the Processing of the Personal Data;
- iv. the recipients or categories of recipients of the Personal Data, if any;
- v. where applicable, the fact that the Data Controller may transfer Personal Data to a third country and the existence or absence of appropriate or suitable safeguards for the data transfer; and
- vi. the existence of the Data Subject rights regarding the Personal Data Processing.

Where the Company intends to further Process the Personal Data for a purpose other than that for which the Personal Data were collected, the Company will provide the Data Subject prior to that further Processing with information on that other purpose and with any relevant further information.

## **VII. Data Security**

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of Data Subjects the Company will implement and maintain appropriate technical and organizational measures to ensure a level of security appropriate to the risk. In particular, the Company will implement and maintain appropriate measures to protect Personal Data from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to Personal Data transmitted, stored or otherwise processed, including (i) encryption of Personal Data, (ii) the ability to ensure the ongoing confidentiality, integrity, availability and resilience of Processing systems and services.

## **VIII. Data Security Breach Response**

The Company will timely address data security breaches or incidents and will implement and maintain appropriate data security breach response plans.

## **IX. International Data Transfers**

The Company may transfer Personal Data from countries in which the data was originally collected to other third countries. It is the Company's policy when engaging in such data transfers to comply with applicable legal requirements, including any data transfer restrictions of local laws or regulations.

## **XI. Implementation**

The present Policy shall be applicable and implemented by all entities of Ravago in Europe in their respective in accordance with local requirements.

## **XII. Miscellaneous**

This Policy shall be effective as of 25 May 2018 and shall be applicable to all Ravago entities in Europe and their Employees. This Policy may be revised and amended by Ravago (Moerenstraat 85A, 2370 Arendonk, Belgium) from time to time and appropriate notice about any amendments will be given.

## **XIII. Contact information**

If you have any questions about this Policy, its scope or purpose, please contact the Legal Department of Ravago at [privacy@ravago.com](mailto:privacy@ravago.com)