

PRIVACY NOTICE

Asco Industries NV is committed to protecting and respecting your privacy.

This privacy notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Further information on our views and practices regarding your personal data and how we will use it is set out in the internal data protection policy.

In this privacy notice, **Asco, we, our** or **us** refers to Asco Industries NV, with company number BE 0441.428.489 and with registered office at Weiveldlaan 2, 1930 Zaventem.

1. Information we collect from you

We may collect and process the following information about you:

name, telephone number, email address, hobbies and interests, family composition, health data, personal characteristics, nationality, education, profession, bank account details, national ID / social security number, clocking information, pictures etc.

Information we collect from you will be recorded, used, and protected by us in accordance with the General Data Protection Regulation (GDPR) and applicable national laws (hereafter collectively referred to as the **Data Protection Legislation**).

2. Use made of your information

We may use your information for the following purposes:

Wage calculation, pension administration, additional wages and benefits, insurance, general HR administration, performance and training management, talent management, recruitment and selection of recruitment and personnel, disciplinary measures and complaint management, risk management, company audits, events, supervision of the workplace (including CCTV –monitoring), network and information security, IT support, health and safety, building facilities management, fleet management, BYOD (use of your own smartphone for professional purposes), fraud prevention, dispute management, internal communication, etc.

3. Legal basis

Your information is being collected and processed on the following legal bases:

- if it is necessary for performing the contract we have with you (e.g. we need to collect your bank account number in order to be able to pay your salary);
- if it is necessary for complying with a legal obligation that applies to us (e.g. we need to collect your national ID number to meet our social security obligations);
- if it is necessary for pursuing our legitimate interests, considering these interests are not overridden by your fundamental rights and freedoms (e.g. if we need your information for internal administrative purposes, for ensuring network and information security or to prevent fraud);
- when you consented to this, e.g. when you consented to participate in a voluntary employee survey.

4. Disclosure of your information

For the purposes set out above, we may share your information with:

- our affiliates/other entities within the Asco group;
- our business partners;
- public authorities (including judicial and police authorities);
- banks and insurers;
- pension funds;
- our payroll solutions providers;
- our professional advisors;
- providers of recruitment related services;
- our suppliers of IT related services;
- our suppliers of marketing related services;

We will also disclose your information to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your information to the prospective seller or buyer of such business or assets;
- if Asco Industries NV or substantially all of its assets are acquired by a third party, in which case the information we hold about you may be one of the transferred assets;
- if we are under a duty to disclose or share your information in order to comply with any legal obligation or to protect the rights, property, or safety of Asco Industries NV, our customers or others.

- This includes exchanging information with public authorities (including judicial and police authorities) in the event of, for example, a cyber security incident.

5. Transfer of your information

We may transfer your information to destinations outside the European Economic Area (the **EEA**), including to Canada and the USA, if that is appropriate (i) to achieve any of the purposes set out under section 2 and/or (ii) to disclose your information to a third party in accordance with section 4 of this Privacy Policy.

In case your information is transferred outside of the EEA, we will make sure that your information is protected by the following safeguards:

- the laws of the country to which your information is transferred ensure an adequate level of data protection (Article 45 GDPR); or
- the transfer is subject to data protection clauses approved by the European Commission (Article 46.2 GDPR) or is subject to the EU-US Data Privacy Framework; or
- the transfer is based on Binding Corporate Rules (Article 47 GDPR); or
- the transfer is based on an approved Code of Conduct (Article 40 GDPR) or an approved certification mechanism (Article 42 GDPR); or
- the transfer is based on an approved data transfer agreement (Article 46.3 GDPR), or data protection clauses adopted by the Belgian data protection authority (Article 46.2 GDPR).

If you wish to receive more information relating to the transfers of your information outside the EEA and/or the safeguards that have been implemented (including on how to receive a copy of these), you can contact us through the contact details set out in section 10 below.

6. Your rights

You have certain rights regarding the information we hold about you. These rights can be exercised by contacting us as set out in section 10 below:

- you have the right to access the information we keep about you – this is because we want you to be aware of the information we have about you and to enable you to verify whether we process your information in accordance with the applicable Data Protection Legislation;
- you have the right, under certain circumstances, to block or suppress further use of your information. When the processing is restricted, we can still store your information, but we can no longer use it;

- if your information is inaccurate or incomplete, you have the right to request the rectification of your information;
- you have the right, under certain circumstances, to request the deletion or removal of your information from our systems;
- you have the right to lodge a complaint about the way we handle or process your information with your national data protection authority;
- if our processing of your personal information is based specifically on your consent, you have the right to withdraw that consent at any time. This includes your right to withdraw consent to our use of your information for direct marketing purposes;
- you have the right to obtain from us, under certain circumstances, your information in a structured, commonly used and machine readable form so you can reuse it for your own purposes across different services. For example: if you leave the company, this enables you to move your information easily and in a secure manner to your new employer.

However, note that we may need to retain certain information, for example for legal or administrative purposes (e.g. keeping of accounting records).

For all requests set out above, please send us an email with “data privacy request” in the subject line. We will respond to your request as soon as practically possible. If we need more than one month (from receipt of your request) to respond to your request, we will come back to you and let you know.

7. Retention of your information

The information we hold about you will be retained in a manner consistent with the applicable Data Protection Legislation. In any event, your information shall not be kept longer than is necessary to achieve the purposes stated in this privacy notice.

In particular, we will only keep for the periods set forth in our Data Retention Policy:

unless:

- the processing of your information is necessary in connection with any actual or potential dispute (e.g. we need this information to establish or defend legal claims), in which case we will keep your information until the end of such dispute; and/or
- the retention is necessary for us to comply with any legal or regulatory obligation (e.g., for tax purposes), in which case we will keep your information for as long as required by that obligation.

8. What happens if you do not provide us with the information we request or ask that we stop processing your information?

The ability for us to perform our obligations with regard to:

- the contract we have with you; or
- legal obligations applicable to us,

sometimes depends on us having access to and being able to use certain information about you. Therefore, and depending on the circumstances, if you do not provide us with the information we request or if you ask that we stop processing your information, this may result in us being in breach of one or more applicable legal or contractual obligations.

9. Automated decision-making

We do not perform automated decision-making based on your information.

10. Contact details

Questions, comments and requests regarding this privacy notice (including in respect of your privacy rights above) must be addressed to the Data Protection Director.

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