

SGS NORTH AMERICA INC. DATA PRIVACY AND CCPA NOTICE

SGS North America Inc. and each business line (collectively, "SGS," the "Company," "we," "us" and "our") are committed to having a strong program in place for protecting consumer personal data and complying with state and federal privacy laws that impose requirements on SGS to protect consumer personal data and grant rights to consumers with respect to their own data. This privacy notice is not applicable to Economic Union (EU) citizens. If you are an EU citizen and would like to learn more about your consumer data protections and rights, visit: <https://www.sgs.com/en-us/privacy-at-sgs>.

There are three aspects to SGS's Data Privacy Policy: (i) data management; (ii) data security and protection; and (iii) incorporation of consumer data privacy rights and protections. In addition to the Company's data privacy policy, each business line may also have contractual obligations of data confidentiality and security with each of its clients. To have an effective and comprehensive privacy policy, the Company must understand the consumer data that the Company collects, stores, uses or discloses. Each business line maintains an inventory that documents the data location (where the data is stored), data flow (how, when and with whom the Company receives or shares the data) and the method and manner under which data is transferred.

SGS implements and maintains reasonable administrative, technical and physical safeguards to protect the security, confidentiality and integrity of consumer data. The safeguards we employ are designed to protect against any reasonably foreseeable threats or hazards to the security or integrity of data, and protect against unauthorized access or use of that information that could result in substantial harm or inconvenience to our clients and consumers. The specific safeguards are designed to control the risks identified. The safeguards may include physical controls, policies and procedures, service provider and vendor agreements, restrictions to access, such as locks and/ or passwords, training, monitoring and other reasonable safeguards. The Company conducts periodic risk assessments to evaluate the adequacy of its administrative, technical and physical safeguards.

The Company and/or its clients may be subject to state or federal laws which establish privacy and consumer data protection principals. The Company and each business line are mindful of whether consumers' have the right to know what data is collected and stored, how it is used and to whom it is disclosed and, potentially, the right to restrict those activities. If the business line performs services or activities involving protected health information for or on behalf of healthcare providers, the business line will be subject to and comply with the Health Information Portability and Accountability Act. If the business line receives non-public personal data from a client that is a financial institution, the business line will be subject to and comply with the Gramm-Leach-Bliley Act. If a business line collects personal data on a particular jurisdiction's residents, the business line will be subject to and comply with the applicable privacy laws and regulations of that jurisdiction.

Finally, all Company employees, including managers, are required to comply with SGS's Data Privacy Policy, and receive periodic training regarding its requirements.

1. CONTACT DETAILS

The Company is responsible, as a business, for collecting and processing the personal data in the context of our business relationship and, in particular, in order to provide services as part of the execution of our contractual obligations with our Customer or to carry out pre-contractual steps as part of an offer for services or for entering into a contract with Customer.

If you have any questions or comments about this Notice to include request for the disclosures, opt-out, deletion, or correction please contact us:

- by e-mail at: privacy.us@sgs.com;
- through the online privacy request form available at: <https://www.sgs.com/en/online-privacy-statement/privacy-request-form>;
- by telephone at 866-747-7748
- if you would like to unsubscribe from SGS email global marketing communications, visit: <https://www.sgs.com/en/newsletters/update-subscription>.

2. CATEGORIES AND TYPES OF PERSONAL DATA COLLECTED AND PROCESSED

The personal data processed by the Company may include:

For most of our services:

- contact information (name, home and/ or business address, telephone, email addresses) (identifiers);
- sensitive personal data (social security information, drivers' license information, login information, credit card number, precise geolocation, racial or ethnic origin, the contents of email and text, as well as genetic data);
- financial details (tax identification and bank account details) ("personal data" defined in the California Customer Records law); and
- Any information that you voluntarily share with us such as feedback, opinions or information provided via any of our helplines.

For some of our services, we may also collect additionally:

- personal data (date of birth, nationality, pictures, electronic identification data such as cookies, IP addresses and passwords) (for further information please see the Cookie Policy (<https://www.sgs.com/en-us/cookie-policy>)) (collectively, internet and electronic network activity information);
- professional and employment information (education and training);
- any data gathered as part of a 3rd party conformity assessment/ audit;
- Device information such as IP address, referring website, SGS pages your device visited and the time that your device visited our website;
- Internet log information and details, collected through our third parties such as Google Analytics, that does not specifically identify you; and
- any other data which we process in the context of our business relationship as per the specific applicable contract terms or General Conditions.

3. PURPOSE AND LEGAL BASIS OF THE PROCESSING AND NATURE OF PERSONAL DATA

The Company will always process the personal data for a specific purpose and will only process the personal data which is relevant to achieve that purpose. In particular, the Company will process personal data on the following legal basis and for the following purposes:

- For fulfillment of contractual obligations.* Personal data is processed to provide our services in the context of carrying out our contracts with our Customers and for managing our business relationship with them and ensure the proper execution of services, for instance by handling Customer service related queries and issuing invoices or making payments. The purposes of data processing are primarily in compliance with the specific service. You can find other details about the purposes of data processing in the relevant contract documents and terms and conditions.
- In the context of legitimate interests.* Where required and without unduly affecting Customers' privacy interests or fundamental rights and freedoms, the Company may process the personal data beyond the actual fulfillment of the contract for the purposes of Company's legitimate interests pursued directly by the Company or by a third party. These legitimate interests may include:
 - Performing our services;
 - Contacting Customers for direct marketing purposes about services Company think will be of interest to Customers, including those offered by SGS Group affiliates;
 - Helping the Company to learn more about its Customers, the products and services they receive, and other products and services they may be interested in receiving by conducting opinion research;
 - Assessing legal claims and defending in legal disputes;
 - Guaranteeing the Company's IT security infrastructure and environment; and
 - risk management and compliance.
- As a result of your consent.* As long as you have granted us consent to process the personal data for certain purposes (e.g., marketing purposes), this processing is legal on the basis of your consent. Your consent is always optional and can be withdrawn at any time.
- Due to legal obligations or in the public interest.* Furthermore, we are subject to various legal obligations, i.e., regulatory and statutory requirements. Purposes of processing include fulfilling control and reporting obligations under fiscal laws or, in certain cases, due to accreditation and/ or certification mandatory requirements. Where the personal data we collect is needed to meet Company legal or regulatory obligations or enter into an agreement with you or is needed for legitimate



purposes, if the Company cannot collect this personal data Company will be unable to engage you as a customer or provide its services and fulfill its contractual obligations (in which case Company will inform you accordingly).

4. WHO HAS ACCESS TO PERSONAL DATA AND TO WHOM IT IS SHARED

Personal data may be disclosed:

- a. within the SGS Group to other SGS affiliates in order to provide services to Customers and ensure a consistent standard of service across our group.
- b. to third parties who need to carry out specific activities in relation to the personal data, according to the purposes of the processing, or to service providers who provide services to Company such as IT and hosting providers, marketing providers, debt collection providers, sub-contractors. When we do so we take steps to ensure they meet our data security standards, so that your personal data remains secure.
- c. in other circumstances such as acquisitions and sale to third party prospecting companies when we envisage selling or transferring part or all of our business providing that all contract measures are taken to ensure they meet our security standards so that your personal data remains secure.

5. INTERNATIONAL TRANSFER OF PERSONAL DATA

When personal data is transferred, we ensure that we have taken steps to protect the personal data before transfer.

SGS transfers personal data across national boundaries within the SGS Group or outside the SGS Group only when:

- a. this is justified for business purposes; and
- b. safeguards have been implemented to ensure that personal data will continue to be protected at a minimum with the same level of protection required in the jurisdiction of origin. To ensure this level of protection for your personal data, SGS may use a data transfer agreement with the third-party recipient based on standard contractual clauses approved by the European Commission or ensure that the transfer is to a jurisdiction that is the subject of an adequacy decision by the European Commission or to the US under the EU-US Data Privacy framework.

Any transfer of the personal data to international organizations and/or non-EEA countries will take place according to one of the methods permitted by current legislation.

6. HOW PERSONAL DATA IS PROTECTED

The Company implements appropriate technical and organizational measures to protect personal data against unauthorized, accidental or unlawful destruction, loss, alteration, misuse, disclosure or access and against all other unlawful forms of processing.

These security measures have been implemented taking into account the state of the art of technology, their cost of implementation, the risks presented by the processing and the nature of the personal data, with particular care for sensitive personal data. In particular, adequate awareness, confidentiality undertakings and training are in place to ensure that personal data is not shared or disclosed to unauthorized persons.

7. HOW LONG PERSONAL DATA IS STORED

Personal data will be stored on paper and/ or electronically for only the time necessary for the purposes for which it was collected, respecting the principles of limitation of conservation and minimization.

Personal data will be kept to comply with regulatory obligations and to pursue the above-mentioned purposes, in compliance with the principles of necessity, minimization and adequacy.

The Company may retain personal data after termination of the contractual relationship to fulfill regulatory and/or contractual and tax obligations or in case of legal claims. Subsequently, when the aforementioned reasons for the processing will cease, the personal data will be anonymized, deleted or destroyed.

8. CONSUMERS RIGHTS

Each consumer can exercise the following rights by sending a request in writing to the Company at the above-mentioned contact details, to the extent permitted by law in the country where the consumer resides or is a national citizen of, as the case may be:

- To access: you can obtain information relating to the processing of your personal data and a copy of such personal data.
- To erase: you can require the deletion of your personal data to the extent permitted by law. We may also deny your deletion request to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities. We will notify any third party that we have shared your personal data with and instruct the third party to delete your personal data.
- To object: you can object to the processing of your personal data on grounds relating to your particular situation. In cases of opposition to the processing of personal data the Company reserves the right to assess the application, which will not be accepted if there are legitimate reasons to proceed with the processing that prevail over your freedoms, interests and rights.
- To rectify: where you consider that your personal data is inaccurate or incomplete, you can require that such personal data be modified accordingly.
- To restrict: you can request the restriction of the processing of your personal data.
- To withdraw your consent: where you have given your consent for the processing of your personal data, you have the right to withdraw your consent at any time.
- To data portability: you have the right to have the personal data you have provided to us returned to you or, where technically feasible, transferred to a third party.
- To know: you have the right to be informed if in the last 12 months the Company has disclosed, sold or shared your personal data to a third party.
- To opt out: you may opt out of allowing the Company to sell your personal data by using SGS's online privacy request form (<https://www.sgs.com/en-us/online-privacy-statement/privacy-request-form>) and selecting the "Do not sell or share my personal information (California Residents)" option from the "type of query" drop down menu.
- To opt in: you may change your mind and opt-in to personal data sales and cross-context

behavioral advertising at any time by using SGS's online privacy request form (<https://www.sgs.com/en-us/online-privacy-statement/privacy-request-form>).

- To correct: you have the right to request to correct any inaccurate personal data about you. If any personal data requires correction, The Company will use commercially reasonable efforts to fulfill your correction request.
- To exercise: you may exercise your rights to know, delete or correct by only you, or someone legally authorized to act on your behalf, may make a request to know, delete or correct related to your personal data. You may only submit a request to know twice within a 12-month period. Your request to know, delete or correct must provide sufficient information that allows us to reasonably verify you are the person about whom the Company collected personal data or an authorized representative and describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. The Company will pass your deletion requests on to service providers, contractors, and, unless impossible or involves disproportionate effort, to all third parties to whom we sold or shared the information. We cannot respond to your request or provide you with personal data if we cannot verify your identity or authority to make the request and confirm the personal data relates to you. You do not need to create an account with us to submit a request to know or delete. However, we do consider requests made through your password protected account sufficiently verified when the request relates to personal data associated with that specific account. The Company will only use personal data provided in the request to verify the requestor's identity or authority to make it. You may make a request for the disclosures, opt-out, deletion, or correction described above by in Section 1.

We strive to maintain good customer relations and deal with your issues to your satisfaction. If you are not satisfied with the Company's answer or processing of your personal data, please contact us via the methods listed in Section 1 above. Should you not be satisfied with us or you believe that the processing of your personal data is contrary to the legislation in force, you have the right to lodge a complaint to a supervisory authority.

The Company is committed to keeping your personal data accurate and up to date. Therefore, if your personal data changes, please inform us of the change as soon as possible.

9. RESPONSE TIMING AND FORMAT

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please contact us as provided in Section 1.

The Company endeavors to substantively respond to a verifiable employee or applicant request within forty-five (45) days of its receipt. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our



written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding our receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal data that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

10. ANTI-DISCRIMINATION

SGS will not discriminate against you for exercising any of your rights stated above. Specifically, unless permitted by law, SGS will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

PRIVACY NOTICE STATUS AND UPDATE

This Privacy Notice was updated in July 2023. The Company reserves the right to amend it from time to time by publishing an updated version on <https://www.sgs.com/en/privacy-at-sgs>. The new modified or amended privacy notice will apply from that revision date. Therefore, we encourage you to review this privacy notice periodically to be informed about how we are protecting your personal data.