

# SGS INTEGRITY - HELPLINE DATA PRIVACY NOTICE

## INTRODUCTION

As part of its compliance program, the SGS Group offers to each of its employees and to third parties, the opportunity to ask questions, report suspected violations of the SGS Code of Integrity and check the status of their report by contacting a dedicated SGS integrity helpline (hereinafter referred to as the "Integrity Helpline"), either by phone or by submitting an electronic report. The purpose of this Integrity Helpline is to allow a direct, secure and confidential communication channel with the SGS Chief Compliance Officer or other qualified compliance personnel working under his/her control.

The use of the Integrity Helpline is voluntary and confidential. It allows people to report suspected violations of company policies or applicable laws. You are encouraged to report possible violations to the Integrity Helpline. If you feel that you are unable to do this, discuss the matter with your direct manager or your local HR department.

## YOUR DATA CONTROLLER

SGS Société Générale de Surveillance SA, a company incorporated in Switzerland and having its registered offices at 1 Place des Alpes, CH1201 Geneva, Switzerland, is responsible as a controller, for collecting and processing information and personal data on SGS Integrity Helpline (hereinafter referred to as the "Personal Data").

If you have any questions or comments about this notice, please contact us:

- By email at [privacy@sgs.com](mailto:privacy@sgs.com); or
- By using our online privacy request form available at <https://www.sgs.com/en/online-privacy-statement/privacy-request-form>; or
- By writing to the company at the following address: SGS Société Générale de Surveillance SA, 1 Place des Alpes, CH1201 Geneva, Switzerland, for the attention of the Data Protection Officer and SGS Chief Compliance Officer.

## PROTECTION OF PERSONAL DATA

The protection of your personal data is important to SGS which has adopted, for the entire Group, strong principles in this area as stated in the SGS Data Privacy Policy (the "Policy") available at <https://www.sgs.com/en/privacy-at-sgs>.

This Data Privacy Notice ("Notice") explains what personal data is collected from you when you use the Integrity Helpline and how we use it.

The Integrity Helpline comprises both a website and telephone lines through which you may report an incident, as well as a database in which the reports are stored. These are operated by an external independent service provider ("Convercent") selected by SGS, which operates in full compliance with best practices and applicable laws on the protection of personal data. We protect personal data by limiting the amount of personal data collected and by restricting access to such data to only those SGS officers who need to have access to it.

## CATEGORIES AND TYPES OF DATA COLLECTED AND PROCESSED

The categories of personal data we process may include:

- your name and contact details (unless you have chosen to report on an anonymous basis);
- your relationship to SGS or an SGS affiliated company (current or former employee, relative of an employee, employee of a business partner, etc.);
- the name and any other personal data about individuals that are identified or identifiable in your report;
- a description of the conduct at issue including time, date and location, as well as any other pertinent information, including personal information about you or any other individual, required to describe the allegations brought to the attention of the Integrity Helpline.

We may also collect information from you and others during any subsequent investigations. This concerns mainly data or information of other employees of the SGS Group, but also from third parties

who may be relevant for the investigation of the matter brought to the attention of the Integrity Helpline.

If you decide to report a matter anonymously, you will be provided with a reference and will be asked to create an account with login details. SGS will then only be able to communicate with you through the Integrity Helpline's platform and none of your personal data will be available to SGS.

In any case, the information provided by you will be treated confidentially. SGS has a strict anti-retaliation policy, we therefore encourage you to identify yourself, to assist with any subsequent communication by the compliance team conducting an investigation.

Please be aware that the information you supply about yourself, your colleagues, or any aspect of the company's operations may result in decisions that affect others. Therefore, we ask that you only provide information that, to the best of your knowledge, at the time that the information is provided, is correct and factual. You will not be subject to disciplinary or adverse action by SGS for any report of a suspected legal or compliance violation that is made in "good faith", even if it later turns out to be incorrect. Acting in "Good faith" means acting with an honest belief and intention. Please be aware, however, that knowingly providing false or misleading information will not be tolerated.

## LEGAL BASIS AND PURPOSE FOR THE PROCESSING AND NATURE OF THE PROVISION OF DATA

SGS collects personal data in connection with its Integrity Helpline to fulfill the following legitimate interests:

- To comply with the SGS Code of integrity, our values and compliance program;
- To fulfill our contractual obligations towards our employees, customers, suppliers and business partners;
- To ensure that the SGS Group, its managers and employees comply with applicable laws and company policies and to meet with legal requirements;

- To satisfy our customers' expectations and to protect our employees;
- For our legitimate interest of investigating a suspected compliance case, preventing and investigating criminal offences and asserting or defending against legal claims;
- To process your personal data based on your consent for all the data you have provided to us about you on a voluntary basis in order to allow us to maintain a direct communication with you during the investigation of the reported violation.

### WHO HAS ACCESS TO DATA AND TO WHOM IT IS SHARED

Access to information collected by the Integrity Helpline, including personal data, is restricted to the SGS Group Chief Compliance Officer and employees and managers exercising a compliance role in the SGS group.

Information which is required to conduct an internal investigation can be transferred to any officers of the SGS Group entrusted with conducting an internal investigation, or to a third party, such as external lawyers who may, from time to time, be hired by the compliance team to perform an investigation.

When required by law, or by the legitimate interests of SGS, information collected by the Integrity Helpline may be referred to public enforcement agencies or be used in litigation involving SGS affiliates.

When Data is transferred across national boundaries, either within the SGS Group or to external suppliers, we take steps to ensure that:

- a. The transfer is justified for SGS legitimate interest or other legal obligations; and
- b. Safeguards are implemented to guarantee that personal data enjoys the same level of protection at destination than in the jurisdiction of origin.

### HOW DATA IS PROTECTED

SGS implements appropriate technical and organizational measures to protect personal data against unauthorized, accidental or unlawful disclosure, access or alteration. All personal data and information provided by you will be stored in a database which is located on servers hosted and operated in Ireland and the Netherlands by our supplier, Convercent, who is committed to maintain the highest standards of IT security.

SGS limits access of data stored on the database to those employees who need to have access to handle reports, questions and requests submitted to the Integrity Helpline. Such personnel have been trained to maintain confidentiality of information and their access to the database is restricted to what is needed for them to perform their work.

### HOW LONG DATA IS STORED

Data communicated to the Integrity Helpline will be stored for a period of five calendar years, following the year in which the report or matter was referred to the Integrity Helpline.

When mandated by law or by the existence of legal proceedings for which information stored on the Integrity Helpline is relevant, the period of retention of the data is extended as required by law or until disciplinary or legal proceedings are finally closed.

### DATA SUBJECTS RIGHTS

Individuals wishing to exercise their legal rights to access, erase, rectify or object to the collection of their personal data through the Integrity Helpline should make a written request to SGS, with a justification of such requests. Such request shall be addressed by e-mail at [privacy@sgs.com](mailto:privacy@sgs.com) or in writing to your Data Controller at the address mentioned above.

SGS will handle such requests to the extent permitted by law in the country of residence of such individual, with due consideration of the interests of others and the need to protect confidentiality of reporters of incidents.

You also have the right to withdraw your consent to the processing of your personal data which you have provided to us on a voluntary basis in order to report the violation. Such withdrawal does not affect the effectiveness of data processing until the withdrawal and it does not prevent SGS from pursuing the investigation of the violation which you have reported to us.

If you are an EU resident and you consider that SGS' processing of personal data is not in compliance with data protection regulations or should you not be satisfied with our information, you have the right to complain to the supervising authority responsible for you or us under the European General Data Protection Regulation (GDPR).

### PRIVACY NOTICE STATUS AND UPDATE

- This Data Privacy Notice is implemented with immediate effect on May 1st, 2019. SGS reserves the right to update or amend the Notice from time to time.