

SGS DATA PRIVACY INFORMATION NOTICE FOR SUPPLIERS AND SUBCONTRACTORS

The protection of your personal data is important to SGS which has adopted, strong principles in this area as stated in its Data privacy Policy available at <https://www.sgs.es/es-es/privacy-at-sgs>. This privacy Policy is applicable to any affiliate company of the SGS Group, regardless of the country in which they are located (hereinafter, the "SGS Group").

Pursuant to Organic Law 3/2018 of December 5, on Personal Data Protection and guarantee of digital rights (Ley Orgánica 3/2018 de 5 de diciembre, de Protección de Datos Personales y garantía de los derechos digitales) and the EU Regulation n. 679/2016 (hereinafter the "GDPR"), SGS TECNOS, S.A.U, as parent company of SGS Group Spain (hereinafter the "SGS") provides the following information to its suppliers and subcontractors, whether they are legal persons or natural persons (hereinafter the "Supplier" or the "Suppliers"), about SGS processing of Supplier's personal data, when Supplier is a natural person, and about their legal representatives or employees personal data, when Supplier is a legal entity (hereinafter the "Data").

1. DATA CONTROLLER AND CONTACT DETAILS.

Each time we collect your Data, we will inform you in a timely manner (in the specific contractual terms) the company of the SGS who act as Data Controller.

You can also find the complete list of companies in the SGS below:

- SGS TECNOS, S.A.U (CIF A-28345577) Calle Trespadarne 29, 28042 (Madrid).
- SGS ESPAÑOLA DE CONTROL, S.A.U (CIF A-08006199) Calle Trespadarne 29, 28042 (Madrid).
- SGS INTERNATIONAL CERTIFICATION SERVICES IBERICA, S.A.U (CIF A-80773534) Calle Trespadarne 29, 28042 (Madrid).
- INSPECCION Y CONTROL DE INSTALACIONES, S.A.U (CIF A-82019258) Calle Trespadarne 29, 28042 (Madrid).
- SGS INSPECCIONES REGLAMENTARIAS, S.A.U (CIF A-84395078) Calle Trespadarne 29, 28042 (Madrid).
- SGS QUALICAFE, S.A (CIF A- 38364642) Calle Trespadarne 29, 28042 (Madrid).
- SGS ACTIVOS, S.L.U (CIF B-86622859) Calle Trespadarne 29, 28042 (Madrid).
- INSPECCION TÉCNICA DE VEHICULOS PARA LA SEGURIDAD, S.A.U (CIF A-87168308) Paseo de las Flores 48, 28823 Coslada (Madrid).
- BARCELONA INTERNACIONAL TERMINAL, S.A (CIF A- 58305590) Paseo Alvarez de la Campa (Almacén) Terminal 3 Consorcio Zona Franca, 08004 (Barcelona)
- GENERAL DE SERVICIOS, ITV, S.A.U (CIF A-78343977) Calle Trespadarne 29, 28042 (Madrid).
- ARAGONESA DE SERVICIOS ITV, S.A.U (CIF A-18096511) Calle Trespadarne 29, 28042 Madrid.
- INSPECCION TÉCNICA LINK, S.A. (CIF A-48551030) Polígono Zubietas, Amorebieta. 48340 (Vizcaya).
- ADVANCED METROLOGY SOLUTIONS S.L.U (CIF- B 86371127) Calle Trespadarne 29, 28042 (Madrid).
- LEANSIS EXPERTOS EN PRODUCTIVIDAD, S.L.U (CIF- B-97561476), Ronda Narciso Monturiol 17 A Planta Baja 1 Parque Tecnológico, 46980, Paterna, (Valencia)
- SGS BRIGHTSIGHT BARCELONA, S.L.U (CIF B-67026377), Sant Cugat del Vallès, Plaça Xavier Cugat, 2, 08174 (Barcelona).

SGS is responsible, as a Data Controller, for collecting and processing the Data in the context of our business relationship and, in particular, to contracting the services, goods or equipment defined in the aforementioned contracts that are formalized with

their Suppliers (hereinafter, the "Service" or the "Services") as well as to carry out the formalities pre-contractual as part of a request for Services.

If you have any questions or comments about this Privacy notice (hereinafter, the "Notice"), please contact us:

- by e-mail at es.dataprotectionofficer@sgs.com
- through the online privacy request form available at <https://www.sgs.es/es-es/online-privacy-statement/privacy-request-form>
- by postal mail to the following address: Calle Trespadarne 29, 3ª planta, 28042, Madrid (España) – for the attention of Data Protection Officer.

2. CATEGORIES AND TYPES OF DATA COLLECTED AND PROCESSED.

The Data processed by the Company usually include:

For most of our services:

- Contact information such as name and surname, postal address, telephone number, email addresses, emergency contact information;
- Identification data such as nationality, photograph, gender, work documentation, identity card or passport, visa number, residency status and work permits, driving licence number;
- Data related to your contract with SGS: such as job contact details (e.g. address, telephone number, email), place of work, default hours, default language, time zone of location and currency of payment, identification number in systems, curriculum vitae, details of person you report to, start and end date of contract; references, status (active/inactive/exempt/resigned/resolved); start date of medical or similar cover;
- Qualifications and training information such as CV, studies, qualifications, background check information, training, skills;
- Payment and benefits data such as payment of the agreed price, benefits, bank account details, job title, tax information, expenses;
- Accreditation and regulatory data such as your registration with any authority and/or regulatory body, your status and any references;
- Monitoring and security information data such as time and attendance or driver tracking systems;
- Communications and internet information such as identification codes and passwords, online data such as your IP address, cookies and internet usage maintained or performed;
- financial details such as tax number identification and bank account details;

For some Services, it is sometimes necessary for us to also collect sensitive information. This information will only be processed when legally required, on one of the following bases where the processing is necessary:

- for the performance of obligations and the exercise of the Supplier's rights and obligations to SGS;
- for the fulfilment of legal requirements relating to the prevention of occupational risks;
- to protect your vital interests or those of another person, where you are physically or legally incapable of giving your consent (for example, in exceptional emergency situations such as a medical emergency); or
- for the establishment, exercise or defence of legal proceedings by SGS.
- to comply with the Crime Prevention Programme ("Programa de Prevención de Imputaciones Delictivas") that the SGS Spain Group has implemented;

If personal information relating to convictions or criminal records is collected about the Supplier, this information will only be processed where permitted

by applicable law, for example:

- criminal records checks,
- the accusation of having committed an offence, criminal offence or the imposition of a criminal conviction which may affect, in SGS's opinion, your professional relationship with SGS,
- to carry out the procedures prior to contracting as part of the SGS Spain Group's Crime Prevention Programme.

In most cases, SGS collects personal data directly from the Supplier. However, SGS may also obtain Data from other sources, such as former customers, research and verification service providers or publicly available information.

3. PURPOSE AND BASIS OF THE PROCESSING AND NATURE OF THE PROVISION OF DATA

SGS will always process the Data for a specific purpose and will only process the Data which is relevant to achieve that purpose. In particular, SGS will process Data on the following basis and for the following purposes:

- a) For fulfillment of contractual obligations (Art. 6.1.b of the GDPR).

Data is processed to manage the contracts with our Suppliers, to manage the business relationship with them and to ensure the proper provision of our services to the final customers, e.g. by processing the inquiries submit by the Suppliers, sending information about the Services to our customers or making payments. You can find other details about the purposes of data processing in the Contractual specific terms and conditions.

- b) For the purpose of the legitimate interests (Art. 6.1.f of the GDPR).

Where required and without unduly affecting Suppliers' privacy interests or fundamental rights and freedoms, SGS will process the Data beyond the actual fulfillment of the contract for the purposes of SGS legitimate interests pursued directly by the SGS Group or by a third party. These legitimate interests may include:

- Contact Suppliers to send information related to the Service contracted;
- Help SGS to obtain more information about its Suppliers, the Services that they provide, and other Services they can provide;
- Assess claims and defending in legal disputes;
- Guarantee SGS Group IT security and environment infrastructure; and
- Carry out risk management and compliance task.
- Comply with the Crime Prevention Programme implemented in the SGS Spain Group.

- c) As a result of your consent (Art. 6.1.a of the GDPR).

As long as you have granted us consent to process the 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. This also applies to withdrawing declarations of consent that were given to SGS before the GDPR came into force, i.e. before 25th May, 2018. For the avoidance of doubt, withdrawal of consent shall not affect the legality of data processed prior to such withdrawal.



- d) Due to legal obligations (Art. 6.1.c of the GDPR) or in the public interest (Art. 6.1.e of the GDPR).

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, certification and / or training mandatory requirements.

Where the Data we collect is needed to meet SGS legal or regulatory obligations or enter into an agreement with you or is needed for legitimate purposes, if SGS cannot collect this Data, SGS will be unable to engage you as Supplier or fulfill its contractual obligations (in which case SGS will inform you accordingly).

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

The Data may be disclosed:

- a) within the SGS Group, to meet contractual obligations with its Suppliers and to ensure a consistent level of quality throughout our Group:
- with those responsible for administering or managing their contractual relationship with SGS.
 - with the finance function to manage payments, with the IT function to manage access to technology infrastructure, with commercial teams, with the legal function for non-compliance or litigation issues, with the Operational Integrity function for Supplier health and safety management, among others.
 - with any SGS Group employee worldwide for the purpose of facilitating communication and networking within the SGS Group.
 - Certain basic personal information, such as your name, location, job title, contact information and any published skills and experience profiles, may also be accessible to third parties through SharePoint, SGS websites and social media.

The companies of the SGS Group will act either as processors appointed in accordance with Art. 28 of the GDPR or as independent controllers, depending on the circumstances and purposes of each contractual relationship.

- b) to third parties who need to carry out specific activities in relation to the Data, according to the purposes of the processing, or to service providers who provide services to SGS such as IT and hosting providers, marketing providers, travel provider, debt collection providers, sub contractors . When we do so we take steps to ensure they meet our data security standards, so that your Data remains secure.
- c) to authorities, entities, customers and/or subjects to whom they must be communicated according to legal or contractual mandatory provisions. These authorities, bodies, customers and/or subjects will act as independent data controllers.
- d) 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 Data remains secure.

5. INTERNATIONAL TRANSFER OF DATA.

Your Data is mainly processed within the European Economic Area (EEA), however, in some cases your Data (including special categories of Data as set out in Article 9 of the GDPR) may be transferred to other parts of the world to affiliates of the SGS Group or to third parties for processing for the purposes described in this Notice.

In case of transfer Data internationally, we ensure that we have taken steps to protect the Data before transfer.

SGS transfers Data within the SGS Group or outside the SGS Group only when:

- a) this is justified for business contractual purposes; and
- b) safeguards have been implemented to ensure that 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 information, 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.

Any transfer of the Data to international organisations and/or non- European Economic Area (EEA) countries will take place according to one of the methods permitted by current legislation.

6. HOW DATA IS PROTECTED.

SGS implements appropriate technical and organisational measures to protect 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 Data, with particular care for special categories of Data. In particular, there is adequate awareness, confidentiality undertakings and training are in place to ensure that Data is not shared or disclosed to unauthorised persons.

All Suppliers must contribute to the security of the SGS Group by following security, privacy and integrity policies and procedures, completing assigned training, and reporting suspicious incidents to the relevant incident response teams promptly.

7. HOW LONG DATA IS STORED.

The 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 minimisation referred to in Art. 5.1, letters c) and e) of the GDPR.

The Data will be kept to comply with regulatory obligations and to pursue the above-mentioned purposes, in compliance with the principles of necessity, minimisation and adequacy.

SGS may retain 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 Data will be anonymised, deleted or destroyed.

8. DATA SUBJECTS RIGHTS.

Each data subject can exercise the following rights referred in articles 15-22 GDPR by sending a request in writing to the SGS at the above-mentioned contact details:

- To access: you can obtain information relating to the processing of your Data and a copy of such Data.
- To erase: you can require the deletion of your Data, to the extent permitted by law.
- To object: you can object to the processing of your Data, on grounds relating to your particular situation. In cases of opposition to the processing of data pursuant to art. 21 GDPR, SGS 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 Data is inaccurate or incomplete, you can require that such Data be modified accordingly.
- To restrict: you can request the restriction of the processing of your Data.

- To withdraw your consent: where you have given your consent for the processing of your Data, you have the right to withdraw your consent at any time.
- To data portability: where legally applicable, you have the right to have the Data you have provided to us returned to you or, where technically feasible, transferred to a third party.

We strive to maintain fluid communications with the Suppliers communications and deal properly with the issues raised. If you are not satisfied with SGS answer received or the processing of your 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 Data is contrary to the legislation in force, you have the right to lodge a complaint to a supervisory authority pursuant to Art. 77 GDPR.

SGS is committed to keeping your Data accurate and up to date. Therefore, if your Data changes, please inform us of this change as soon as possible.

PRIVACY NOTICE STATUS AND UPDATE.

This Notice was updated in February 2024. SGS reserves the right to amend it from time to time. If the Notice has been updated, SGS will take steps to inform its Suppliers of the update by appropriate means, depending on how SGS normally communicate with such Supplier.