



**PRIVACY POLICY FOR EMPLOYEES
ARTICLES 13 and 14 OF REGULATION (EU) 2016/679**

Dear Mr/Mrs,

EU Regulation no. 679 of 27 April 2016 (hereinafter "the Regulation") provides for the protection of individuals with regard to the processing of their personal data.

We therefore invite you to read the privacy policy below and to consent to the processing of your personal data, where required.

C.O.I.M. S.p.A. – CHIMICA ORGANICA INDUSTRIALE MILANESE - (hereinafter also the "**Company**"), in the course of its business activities has a strict policy for the security and confidentiality of the personal data of its employees (hereinafter also "data subjects"). This data will therefore be processed lawfully and correctly, in conformity with the provisions of the Regulation.

Pursuant to Article 13 of the Regulation, the Company must provide you with specific information regarding the processing of your personal data and of special categories of your personal data, as defined below, based on your working/training relationship with the Company.

IDENTIFICATION PARTICULARS OF THE DATA CONTROLLER

The Data Controller of your personal data is the company C.O.I.M. S.p.A. - CHIMICA ORGANICA INDUSTRIALE MILANESE, with registered office in Buccinasco (MI), via Delle Azalee no. 19, and sub-offices/production sites in Offanengo (CR), via Ricengo no. 21/23, and in San Martino in Strada (LO), via privata Fabrizio De Andrè no. 24, VAT NUMBER 00798810156.

IDENTIFICATION PARTICULARS OF THE DATA PROTECTOR OFFICER (DPO)

The Data Protector Officer (DPO) appointed by C.O.I.M. s.p.a. is Nicola Bernardi, who can be reached at the email address: dpo_coim_it@coimgroup.com.

PERSONAL DATA CONCERNING YOU THAT MAY BE COLLECTED

The term "**Personal Data**" refers e.g. to any information concerning your person, which could identify you directly and/or indirectly, such as e.g. your personal particulars, contact details, pre-contractual, work and/or financial data, as better described below:

- personal particulars e.g. your name, citizenship, images, passport/identity card number and/or number of other equivalent document (including data relating to any consular visas, VISA data, etc.), date of birth, health card number and tax code;
- information regarding your family relationships and in-laws;
- information regarding your ownership interests in and administrative positions held at third-party companies, public entities, and nonprofit organizations;
- contact details, such as your home address, telephone numbers, e-mail addresses;

- all information concerning employment relationships and their termination e.g. job title, duties and level; employee registration number, place of work, cost centre, department; positions held and projects assigned; work schedules and time attendance, leave, absences; business trips/secondment and off-site travel; training and/or specialisation courses; length of service data; qualification appraisals and/or notes; disciplinary proceedings; employment commencement and termination date; reason for termination of employment;
- financial information e.g. remunerations/wages/fees; variable emoluments or based on bonuses/commissions, where applicable; fringe benefits (including insurance benefits); management of severance pay and indirect remuneration mechanisms; social security and insurance data; bank account details; data from your and your spouse's tax return;
- any other data provided by you.

The Company will also process certain "**Special categories of personal data**" i.e. data from which may potentially be inferred (among other things) racial and ethnic origin, philosophical and religious beliefs, membership of political parties or trade unions, as well as health-related data (e.g. medical and accident certificates; number of days of illness; information on disabilities or suitability for work and/or work limitations; pregnancy certificates and/or information on maternity/paternity leave; membership of "protected categories"; results of medical examinations carried out pursuant to law and contract, public offices etc.; information on criminal convictions and offences, if requested and permitted by applicable law).

Where the aforementioned special categories of data include, in particular, data relating to **criminal convictions and offences**, processed by the Company pursuant to Article 1 of the National Collective Labour Agreement (CCNL) in force for data security purposes or for purposes of participation in public tenders or in compliance with anti-mafia regulations, limited to personnel for whom the collection of such data is required by applicable regulatory provisions, note that such data shall be processed in order to implement applicable legal obligations, and only where strictly necessary and in compliance with applicable legal limits.

Special categories of personal health-related data which the company occupational physician acquires and processes as part of his/her duties (pursuant to Legislative Decree 81/08, as amended, and other workplace health and safety provisions) in order to periodically carry out preventive medical checks, will be processed exclusively by the Company through its occupational physician, in his/her capacity as an independent data controller. The only information that the occupational physician may communicate to the Company shall be medical fitness or unfitness data.

Personal data and special categories of personal data are indicated together below, simply, as "**Data**").

Finally, the Company may be called on to process - for purposes related to the fulfilment of administrative, accounting and tax obligations pertaining to the employment relationship - **Data of your dependent family members**, whether minors or adults (e.g. personal particulars or other data relating to family members provided by you), to whom this privacy policy applies. You are responsible for communicating the content of this privacy policy to your family members.

HOW YOUR DATA MAY BE COLLECTED

The Company collects your Data directly from you, either when you provide such data to us or by the Company's website. Certain data may also, in some circumstances, be collected from third parties (e.g.

recruitment companies, public authorities, where applicable), where necessary and always in compliance with applicable legislative and regulatory provisions.

We kindly request you to promptly report any changes of your personal data to the relevant company office in order to ensure compliance with Article 5 of Regulation EU 2016/679, which requires data that are collected to be accurate and, therefore, up to date.

FOR WHAT PURPOSES YOUR DATA MAY BE USED AND ON WHAT LEGAL BASIS

Your Data are processed as part of the Company's ordinary activities, as indicated below.

- A. Purposes associated with obligations provided for by applicable legislative or regulatory provisions in force or by EU rules, or by official measures/requests of authorities vested with the requisite authority by law and/or by supervisory and control bodies and, in particular, provided for by rules on social security and welfare (including supplementary welfare), on the health and safety of workers or the general population, or on tax matters, health protection or public order and safety;
Basis of the data processing: compliance with a legal obligation.
The provision of Data for such purposes is mandatory, as the failure to do so will make it impossible for the Company to fulfil specific legal obligations and consequently to properly implement the employment relationship with you.
- B. Purposes strictly associated with and instrumental to the management of the employment relationship (e.g. archiving/storage of personal data, obligations associated with employees' contract and economic terms and conditions, bookkeeping, the payment of emoluments and granting of gifts and/or fringe benefits, as applicable, the fulfilment of obligations associated with payment of union dues, if any, or the exercise of union rights, the recording of attendance and of working hours, calendar management, address book management, the management of holiday plans, of time attendance, on any corporate communications medium, human resources development initiatives - training courses, access to databases and corporate IT systems, performance evaluation and promotions and career development decisions, and also for all acts and initiatives for which you grant us special authorisation, and for any other purposes strictly associated with or instrumental to the management of the employment relationship, including management of meal vouchers, personnel training and assessment, etc.
Basis of the data processing: implementation of a contract to which the data subject is party.
The provision of Data for such purposes is mandatory, as the failure to do so will make it impossible for the Company to continue the employment relationship with you.
- C. Purposes linked to organisational and production necessities, for activity planning purposes - including the efficient management of resources and internal statistical analyses -, for internal managerial and organisational communications purposes, for the management of the Company's IT resources and equipment, and also for purposes of workplace safety and the need to safeguard corporate assets, also by installing audiovisual systems and/or other devices which also enable the remote control of workers' activities, exclusively in order to facilitate work processes (identification of persons, control of access to buildings and company premises, also by using badges and video surveillance systems).
Basis of the data processing: the Company's legitimate interest in carrying out administrative-accounting activities related to the normal operation of the Company, and also in order to safeguard the company's assets and ensure workplace safety.



The provision of Data for such purposes is mandatory, as the failure to do so will make it impossible for the Company to implement the employment relationship with you.

- D. Purposes associated with its business demands, to facilitate legal or structural changes to the Company or the expansion of its activities (e.g. to enable the Company to participate in competitive tenders, procurement contracts and to commence commercial dealings with other companies, or to manage extraordinary transactions such as mergers, acquisitions, company or business unit assignments, joint ventures, consortium agreements and other extraordinary transactions) which could potentially require your data to be communicated to third parties.

Basis of the data processing: the Company's legitimate interest in conducting and expanding its business.

The provision of Data for such purposes is mandatory, as the failure to do so will make it impossible for the Company to implement the employment relationship with you.

- E. Purposes related to the handling of any reports of conflicts of interest.

Basis of the data processing: the Company's legitimate interest.

The Company shall process Data falling within **Special categories of personal data** for the following additional purposes:

- F. To protect the life or physical safety of employees or third parties.

Basis of the data processing: to safeguard a vital interest of the data subject or of another natural person.

The provision of Data for such purposes is mandatory, as the failure to do so will make it impossible for the Company to continue the employment relationship with you.

The Company also informs you that it may process Data relating to your image for the following additional purposes:

- G. to enable you to become better known inside the Company, by having your photograph published on your ID card (badge), in order to optimise your security inside the Company's premises. Photographs are saved inside folders on the company server and managed using the program for management of people badge.

Basis of the data processing: the Company's legitimate interest to guarantee safety in the workplace.

- H. to enable you to become better known inside the Company, by having your photograph published on the company intranet and at other dedicated locations (e.g. associated with your e-mail account) in order to optimise your security inside the Company's premises. Photographs are saved inside folders on the company server and managed using the program for management of people badge.

Basis of the data processing: consent. The Company may only process your Data, for the purposes referenced in this point, after it has obtained your free and express consent at the bottom of this privacy notice. You entitled to withhold such consent and/or revoke it at any time.

- I. to promote the Company's image by having data such as your personal details and/or image published on the website www.coimgroup.com, or on social networks or in brochures and pamphlets or other informative material of the Company intended for distribution outside the

Company, and also in order to facilitate video recordings during events and/or campaigns to promote the Company's activities.

Basis of the data processing: consent. The Company may only process your Data, for the purposes referenced in this point, after it has obtained your free and express consent at the bottom of this privacy notice. You entitled to withhold such consent and/or revoke it at any time.

HOW WE KEEP YOUR PERSONAL DATA SECURE AND FOR HOW LONG

The processing of your Data shall be based on principles of correctness, lawfulness and transparency and may also be carried out using automated methods for storing, managing and transmitting said Data.

Your data will be stored in paper, computer and electronic communications archives located within the European Economic Area (EEA). The data processing will occur using instruments and procedures that can guarantee data security and confidentiality and prevent the risk of data loss, unauthorised access to and unlawful use and dissemination of data.

The Company, while guaranteeing the security and confidentiality of your Data, may also process Data through the following means:

- ✓ the Company's video surveillance system, as better specified in the following paragraph,
- ✓ the work tools or devices you use to carry out your work activities (e.g. PCs, tablets, company smartphones, internet and intranet networks, company e-mail),
- ✓ access and attendance logging technologies or tools (e.g. ID badges, magnetic or electronic detectors),

subject to the provisions of Article 4(3) of Law 300/1970 (Workers' Statute), which provides that information and data collected through the work tools or devices used by employees for their work, and those which are required for access and attendance logging purposes, may be used for employment-related purposes on condition that the employee is adequately informed about how these tools and devices are used and are controlled for data-processing purposes.

The use of the aforementioned work tools and devices, and access and attendance logging tools, is specifically regulated by the rules on the use of company tools and devices, which you, by signing this document, declare to have read and to be fully familiar with. The aforementioned document contains specific instructions on how employees are to use their work tools and devices, and also indicates the procedures by which the Company will process data from said work tools and devices (which it reserves the right to do), and it details the consequences of infringement of the rules provided for therein.

Data provided will be retained for the entire duration of the employment, and for at most 50 years after the termination thereof.

Note that data retention periods for Data contained in contracts, communications and commercial letters may be determined by law from time to time, and may be limited to 10 years, based on the normal limitation period in force in Italy.

DATA PROCESSING THROUGH VIDEO SURVEILLANCE

The Data Controller informs you that it has put in place a video surveillance system at its premises. The system aims to meet internal security needs and to permit the monitoring of access to the various activities of C.O.I.M. S.p.A., and has the following purposes:

- to assist in the legal defence of C.O.I.M. S.p.A. or of third parties involved in legal proceedings, in the event that offences are committed;
- to safeguard employees, persons in general, property and company assets;
- to prevent unlawful acts of any kind.

The purposes of the data processing observe the principles of correctness and lawfulness and conform with legal provisions whose purpose is to protect the confidentiality of your data, not least those set out in the Italian Data Protection Authority's General Provision on video surveillance of 8 April 2010 currently in force, and in Article 4(1) of Law no. 300/1970.

Images collected shall not be used to directly or indirectly monitor employees who are videoed in the course of their duties.

The video equipment will facilitate the reviewing as well as recording of the data filmed.

Your personal data are communicated primarily to authorities responsible for the control and supervision of security/safety, and also to third parties/recipients who, also on behalf of the Company, handle security in the workplace or who manage, on its behalf, the activities of caretakers security/surveillance details, IT consultants, assistance/maintenance companies. Third parties/recipients carry out their activities in compliance with specific legal obligations which the Data Controller is required to observe through them. Any communication that does not meet these purposes will require your consent.

How video surveillance data are stored

Only the Data Controller, specially designated internal and external data processors and duly authorised data handlers have authority to view and record video-surveillance images and footage. The video surveillance system only enables the processing of personal data collected by means of filming, which only occurs on Company property based on the actual positioning of video cameras. The video surveillance system is designed to display and record filmed images.

The images are kept only for as long as strictly necessary in order to facilitate the aforementioned purposes, and also (as applicable) in order to comply with requests from the judicial authorities (including judicial police), and also in order to safeguard and facilitate the data subject's right of access pursuant to Articles 15 et seq. of the Regulation .

WHO WE SHARE YOUR PERSONAL DATA WITH

Your Data may be accessed exclusively by Company employees who need to process said data in accordance with the purposes indicated above, including system administrators for all activities related to the functioning of the work tools and devices, as described in the preceding paragraph.

The Company may - in order to carry out certain data-processing activities required so as to manage the employment relationship - communicate such data to the following categories of external party, who will be entitled to process your Data as independent data controllers or as data processors, whom the Company, in that eventuality, shall appoint in compliance with applicable laws (depending on their data processing-related responsibilities). The Company may share your Data with:

- ✓ other COIM group companies, especially for administrative, accounting or personnel administration purposes, to ensure compliance with applicable procedures, to respond to and satisfy legal requests and claims, etc;
- ✓ professional legal, tax and notary offices, for purposes strictly related to their business activities;

- ✓ independent audit firms;
- ✓ banks and credit institutions, for the payment of salaries;
- ✓ companies involved in purchase/acquisition procedures: if the Company is sold or transferred in whole or in part, your personal data may be transferred to the other company (e.g. new employer, potential new employer, newly acquired company or potential newly acquired company) and to its advisors, before the acquisition (e.g. during the due diligence phase) or after the acquisition, without prejudice to the data subject's rights and entitlements under applicable law;
- ✓ third party companies, for participation in competitive tenders, procurement contracts, or for the signing of contracts with same, in order to facilitate the Company's business and day-to-day activities;
- ✓ third-party suppliers, if any, for purposes associated with the administration or management of personnel (payroll processing including wage and contributions and tax reporting/returns, management of business trips and expense accounts, canteen service, travel agencies, hotel booking agencies, leasing companies, companies responsible for managing security/surveillance systems, professional training, etc.) and use of company property (motorcars, telephones, mobile phones);
- ✓ any third-party providers responsible for managing digital channels and multichannel communication strategies
- ✓ insurance companies;
- ✓ social security and welfare agencies, for legal compliance purposes (including social security/pension and supplemental health care funds);
- ✓ police forces, and other public administrations, in fulfilment of obligations under applicable legislative or regulatory provisions or EU rules; tax authorities;
- ✓ employment and job placement agencies;
- ✓ persons/entities who are qualified to submit tax returns (intermediaries such as banks, post offices, authorised tax assistance centres (CAF), trade associations, professionals, etc.);
- ✓ occupational physician, for workplace health and safety purposes;
- ✓ trade unions to which the data subject may be affiliated;
- ✓ those responsible for personnel training and development activities;
- ✓ your family members or cohabiting partner, where strictly necessary;
- ✓ private investigators possibly appointed by the Company.

In any case, any access to your data is limited to persons who require such access in order to enable them to fulfil their job duties.

Your data shall not be disseminated, except in the case of images that may be used - with your consent - for the purposes outlined in letters H and I of the para. FOR WHAT PURPOSES YOUR DATA MAY BE USED AND ON WHAT LEGAL BASIS".

For further information, you may contact the Company at the addresses indicated in the para. "CONTACTS".

INTERNATIONAL TRANSFERS

As a globally active enterprise, the Company may need to transfer your Data to countries outside the European Union (EU) or the European Economic Area (EEA) (hereinafter, "Third Countries") where the Company or its servers are located, or to other places where its suppliers or service providers or their servers are located, whose data protection laws may be less stringent than those of the EEA. In the latter



case, the Company will ensure that any Data belonging to you which is accessed outside the EEA is processed subject to appropriate safeguards in place.

The Company will provide suitable safeguards and protections for such cross-border data transfers, as required by law, and these will include the use of European Commission approved Standard Contractual Clauses, Codes of Conduct and/or Binding Corporate Rules. Such clauses impose similar data protection obligations directly on the recipient, unless applicable data protection laws permit us to transfer the data without such formalities. You can request a copy of such documentation by contacting the Company at an address provided in the "CONTACT US" section below.

Certain Third Countries e.g. Canada and Switzerland, have received authorisation from the European Commission, since they provide similar safeguards to those of EEA data protection legislation and, consequently, no additional legal safeguards are required. For companies located in third countries that have not been granted such authorisation, such as India or Japan, we will request your consent to the transfer or, alternatively, your personal data will be transferred using the forms of data protection outlined above, as indicated by the European Commission.

CONTACT PERSONS

If you wish to exercise your rights and make a report for any reason associated with the processing of your Data, you can send an email to the following address: privacy@coimgroup.com and dpo_coim_it@coimgroup.com.

YOUR DATA PROTECTION RIGHTS AND YOUR RIGHT TO FILE COMPLAINTS WITH THE SUPERVISORY AUTHORITY

You may, at any time, informally request the Data Controller that you wish to exercise the following rights and entitlements against the Company, provided that a legal basis for your request exists:

- ✓ to have access to Data concerning you, and to have such data corrected;
- ✓ to have Data deleted, if permitted by applicable rules;
- ✓ to have incomplete Data supplemented;
- ✓ to have data-processing operations restricted, if permitted by applicable rules;
- ✓ to receive a copy of Data which you provide to the Company, in a format that is structured and in common use and readable on an automatic device (portability), and to have such Data transmitted to a different data controller.

You are also entitled to oppose, in whole or in part, the use of Data processed by the Company on the basis of legitimate interest, provided that the regulatory preconditions for this exist.

You are entitled, finally, not to be subjected to an automated decision-making process, including profiling.

You may at any time revoke your consent to certain data processing operations that have future effects. This revocation shall not affect the legitimacy of data processing operations carried out before the said revocation.

For any complaints or reports concerning the manner in which your Data is processed, we will do our best to address your concerns. Nevertheless, should you wish to do so, you can send your complaints or reports to the Italian Data Protection Authority, using the contact details on the website www.garanteprivacy.it.



In relation to the foregoing, the Company kindly requests you to return a copy of this letter, signed in acknowledgement.

The Data Controller
C.O.I.M. S.P.A.

DECLARATION OF FAMILIARITY WITH THE PRIVACY POLICY

I hereby declare that I have read, understood and received a copy of the Privacy Policy related to the Company’s data processing operations concerning my personal data, and I hereby undertake to make the content thereof known also to family members/cohabiting partner, as relevant, whose data I am disclosing solely to facilitate the Company to comply with the contractual obligations undertaken and with associated rules of law.

Signature.....

Place..... Date

CONSENT FORM

The undersigned _____ declares to have received and read the above privacy policy, and to authorise the Company to process his/her Data for the purposes indicated in the said privacy policy and, more specifically:

point 1 to enable you to become better known inside the Company, by having your photograph published on the company intranet and at other dedicated locations (e.g. associated with your e-mail account), in order to optimise your security inside the Company's premises. Photographs are saved inside folders on the company server and managed using the program for management of people badge.

consents does not consent

point 2 to promote the Company's image by having data such as your personal details and/or image published on the website www.coimgroup.com, or on social networks or in brochures and pamphlets or other informative material of the Company intended for distribution outside the Company, and also in order to facilitate video recordings during events and/or campaigns to promote the Company's activities.

consents does not consent

Date and legible signature of Employee _____

The Company informs you that you may, at any time, revoke your consent by notifying the personal development in writing, to this effect.