



SGS DATA PRIVACY POLICY

BE **DATA SAFE**



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MESSAGE OF THE CHIEF EXECUTIVE OFFICER

In the regular course of business, SGS collects Personal Data from its customers, suppliers, employees, website users, job applicants, contractors, shareholders, partners and other third parties.

SGS recognises that Personal Data must be treated with caution. We are committed to conducting our business in accordance with all relevant Data Protection and Privacy laws of the countries in which we operate and in line with the highest standards of ethical conduct.

Protection of Personal Data is important to every part of our business. It is at the heart of our promise to our clients, our values, our principles, our conduct and our success and is essential to maintaining trust.

Stricter regulations coming into force and digitalisation of our services are an opportunity for SGS to remind our clients and the industry of our integrity in one of the most important areas of modern life – the protection of Personal Data.

If you have questions or comments about this policy, please contact us at privacy@sgs.com.



Frankie Ng
Chief Executive Officer

SCOPE

This SGS Data Privacy Policy applies to all affiliates and entities of the SGS Group. It defines the conduct expected of each SGS employee, officer and director when collecting, handling and processing personal data of SGS' customers, suppliers, employees, contractors, and other third parties.

This policy is organised around three underlying commitments:

1. Collecting and processing Personal Data fairly and lawfully

2. Respecting Individual rights and choices

3. Managing Personal Data responsibly

Personal Data refers to any information which relates to an individual, and may include amongst other: contact information (name, home and business address, telephone, email addresses); personal information (date of birth, citizenship, pictures, electronic identification data such as cookies, IP addresses and passwords) professional and employment information (education and training), financial details (tax identification and bank account number).

This policy defines SGS' uniform and baseline standards which apply in the absence of more stringent rules which may be mandated by local laws.

Internal implementation rules, guidelines and training are provided with all necessary supporting documentation in order to act according to the SGS Data Privacy Policy.

3 UNDERLYING COMMITMENTS

SGS DATA PRIVACY POLICY

COLLECTING AND PROCESSING DATA FAIRLY AND LAWFULLY

BEING OPEN ABOUT THE PERSONAL DATA WE COLLECT AND USE

We inform individuals about the use of their Personal Data

When collecting Personal Data, SGS informs clearly, honestly and transparently about the nature of the Personal Data it collects and what it intends to do with it. The use of Personal Data by SGS for a different purpose than initially communicated is not authorised, unless adequate information is provided to the concerned individuals, and where applicable, consent for the intended use is given to SGS. In general, SGS is authorised to use Personal Data for secondary purposes when implementing internal controls and audits and complying with its statutory and regulatory obligations.

USING PERSONAL DATA FOR LAWFUL AND SPECIFIC PURPOSES ONLY

We collect and process Personal Data only if we have a lawful reason to do so

SGS collects and processes Personal Data only to the extent that either (i) a valid and informed consent was given or (ii) if it is required by SGS legitimate business interests, such as entering into or performing contracts, processing and receiving payments, carrying out contractual obligations and complying with statutory or regulatory commitments.

We allow consent given to be subsequently withdrawn

Any consent given by individuals to the collection and use of their Personal Data must be given freely and in response to a clear information by SGS about the intended use of the data. Such consent can be withdrawn anytime by the individual without undue complications. The date, content and validity of such consent must always be documented.

We adhere to instructions given by the Data Controllers

When processing Personal Data on behalf of a client or another third party (a Data Controller), SGS will comply with the guidelines and instructions of the Data Controller in addition with this policy.

ENSURING DATA QUALITY

We collect and keep Personal Data which is adequate, relevant, not excessive and up to date

SGS collects and stores the minimum amount of Personal Data required for the intended initial purpose for which the data is used and ensures that, at all times, Personal Data in its possession remains relevant and adequate for its intended purpose.

SGS will keep all data stored up to date and accurate and will ensure it is corrected when required.

We keep Personal Data only for as long as it is really necessary

Personal Data is kept by SGS only for the period of time required by its intended purpose. Specific retention policies will define the time after which such data will need to be either deleted, destroyed or de-identified.

RESPECTING INDIVIDUALS' RIGHTS AND CHOICES

RESPECTING INDIVIDUAL'S RIGHTS

We respond to any requests or complaints made by individuals in connection with their Personal Data

SGS recognises the rights of individuals to:

- (i) Request access to the Personal Data collected on them by SGS and the reason for SGS having such data
- (ii) Obtain a copy of the Personal Data held on them
- (iii) Request the rectification or deletion of inaccurate or incomplete Personal Data

- (iv) Withdraw consent given to SGS for the collection of their Personal Data at any time, including the right to unsubscribe or to opt out of marketing communications and commercial publications of SGS

SGS will respond to requests made by individuals exercising their rights within a reasonable period of time after the individual's request or within any specific period that may be required by applicable local laws.

SGS will handle and investigate complaints made by individuals about any breach of these rules or data privacy laws and will respond to such complaints in a timely manner.

RESPECTING INDIVIDUAL'S CHOICES

We respect customers' rights to object to the use of their Personal Data or to opt out of receiving direct marketing communications

When using Personal Data for marketing purposes, SGS will inform individuals in a clear and plain language about the use of their data for marketing purposes. SGS respects the right of its existing and prospective customers to:

- (i) only receive marketing communications from SGS if an explicit and specific prior consent has been provided, when required by applicable laws, or if SGS can demonstrate that it is authorised to send such communications for its legitimate business purposes
- (ii) no longer receive any marketing communications if a specific preference setting, an opt-out or an objection to use such data for marketing purposes has been received by SGS

SAFEGUARDING THE USE OF SENSITIVE PERSONAL DATA

We use sensitive Personal Data only if it is absolutely necessary

SGS recognises that some categories of Personal Data are particularly sensitive and require a higher level of protection. Sensitive Personal Data includes

information regarding a person's health, biometric and genetic data, religion and political opinions, racial or ethnic origin, criminal records and any other information protected specifically by the relevant applicable privacy laws.

SGS collects and processes such sensitive Personal Data only when this is absolutely necessary under one of the following circumstances:

- (i) Explicit consent was given by the individual
- (ii) The use is necessary for SGS to comply with employment laws or other statutory obligations or to protect the health of the specific individual (such as in a medical emergency)

SGS implements adequate procedures and safeguards to restrict access to sensitive data only by appropriate persons and prevent its unauthorised access, use and dissemination.

MANAGING DATA RESPONSIBLY

TAKING APPROPRIATE SECURITY MEASURES

We adhere to appropriate technical and organisational security measures to protect Personal Data

SGS implements adequate security measures to ensure the confidentiality, integrity and availability of Personal Data

and to prevent the risk of unauthorised or unlawful access, alteration, destruction or disclosure of such data. The measures for protection are based on impact assessments taking into account the risk to the individual related to the specific Personal Data stored by SGS. These measures include security and organisational measures adapted to the type of processing and the nature of the data to be protected.

SGS will inform individuals promptly of any privacy breach that has compromised their Personal Data and will report such incident to the relevant authorities as required by applicable laws.

We ensure that our suppliers or partners also adopt appropriate and equivalent security measures

SGS requires from its suppliers or sub-contractors that they fully comply with SGS Data Privacy Policies, with any applicable data protection and privacy legislation and maintain adequate technical and organisational security arrangements to protect Personal Data.

We ensure that our employees maintain the confidentiality of personal data processing

SGS limits access to Personal Data to those of its employees or suppliers who need to perform specific tasks in relation with such Data. Adequate awareness, training, and confidentiality undertakings are in place to ensure that Personal Data is not shared or disclosed

to unauthorised persons, including any other SGS employees who do not need to access such Personal Data.

ENSURING ADEQUATE PROTECTION FOR INTERNATIONAL TRANSFERS

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 (i) this is justified for business purposes and (ii) safeguards exist 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.

MINIMISING RISK IMPACTS TO INDIVIDUALS

If the processing is likely to result in a high risk to individuals, we conduct a Data Protection Impact Assessment

SGS conducts Personal Data Impact Assessments to identify risks that the processing of Personal Data by SGS may cause to the privacy rights of individuals in order to eliminate or reduce such risks.

Such prior Personal Data Impact Assessments will be part of any development of new services or business opportunities and acquisitions by SGS.

WWW.SGS.COM

WHEN YOU NEED TO BE SURE

