

SGS DATA PRIVACY INFORMATION NOTICE FOR FREELANCE

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 freelancers engaged by SGS (hereinafter referred to as "Freelance") about the processing of their personal data (hereinafter referred to as "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. (CIF A-28345577) Calle Trespaderne 29, 28042 Madrid.
- SGS ESPAÑOLA DE CONTROL, S.A. (CIF A-08006199) Calle Trespaderne 29, 28042 Madrid.
- SGS INTERNATIONAL CERTIFICATION SERVICES IBERICA, S.A. (CIF A-80773534) Calle Trespaderne 29, 28042 Madrid.
- INSPECCION Y CONTROL DE INSTALACIONES, S.A (CIF A-82019258) Calle Trespaderne 29, 28042 Madrid.
- SGS INSPECCIONES REGLAMENTARIAS, S.A (CIF A-84395078) Calle Trespaderne 29, 28042 Madrid.

- SGS QUALICAFE, S.A (CIF A-38364642) Calle Trespaderne 29, 28042 Madrid.
- SGS ACTIVOS, S.L (CIF B-86622859) Calle Trespaderne 29, 28042 Madrid.
- INSPECCION TÉCNICA DE VEHICULOS PARA LA SEGURIDAD, S.A (CIF A-87168308) Paseo de las Flores, 48 – 28823 COSLADA (Madrid).
- BARCELONA INTERNACIONAL TERMINAL, S.A (CIF A- 58305590) Paseo Alvarez de la Campa (Almacen) Terminal 3 Consorcio Zona Franca 08004 (Barcelona)
- GENERAL DE SERVICIOS, ITV, S.A. (CIF A-78343977) Calle Trespaderne 29, 28042 Madrid.
- ARAGONESA DE SERVICIOS ITV, S.A (CIF A-18096511) Calle Trespaderne 29, 28042 Madrid.
- VALENCIANA DE SERVICIOS ITV, S.A. (CIF A-96862933) Poligono Oliveral, Nacional III, salida 342, Ribaraja de Turia, 46190 (Valencia).
- INSPECCION TÉCNICA LINK, S.A. (CIF A-48551030) Poligono Zubietas, Amorebieta. 48340 (Vizcaya).
- ADVANCED METROLOGY SOLUTIONS S.L (CIF- B 86371127) Calle Pitagoras 7, 1º planta. 28906 Getafe - Madrid.
- LEANSIS EXPERTOS EN PRODUCTIVIDAD, S.L. (CIF- B-97561476), calle Narciso Monturiol I Estarriol, 6, 46980 Paterna (Valencia)
- LEANSIS BCN PRODUCTIVITY, S.L. (CIF B-66308974), calle Pau Vila número 13, escalera 1, piso 1, puerta 7 San Cugat del Valles (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 Freelance (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, 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 mail to the following address: Calle Trespaderne 29, 3º 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 SGS usually include:

For most of Services:

- Freelancer contact information data such as name, surname, postal address, telephone number, email addresses, emergency contact information;
- Personal / identification data such as nationality, photograph, gender, eligibility to work documentation, ID card or passport, visa number, residence status and right to work permits, driver's license number if you are using a SGS vehicle;
- Data relating to your contract with the SGS: such as work contact details (e.g. address, telephone number, e-mail), work location, default hours, default language, time zone and currency for location, worker number and various system IDs, work biography, reporting line, worker type, hire/contract start and end dates, cost center, role title and role description, working hours and patterns, termination/contract end date; your last day of work, references, status

The logo for SGS, consisting of the letters 'SGS' in a bold, sans-serif font. A vertical orange line is positioned to the right of the letters, and a horizontal orange line is positioned below the letters, forming an L-shape that frames the logo.

(active/inactive/terminated); the reason for any change in role and date of change; benefit coverage start date;

- Qualification and training information such as CVs, qualifications, background verification information; training, qualifications, skills;
- Payment and benefit data such as contract pay as applicable, allowances, bank account details, job level, tax information, expenses;
- Freelancer Regulatory data such as your registration with any applicable regulatory authority, your regulated status and any regulatory references;
- Monitoring and security information data to ensure the security as well as the safety of our Freelancer such as time attendance or driver tracking systems if you are using a SGS vehicle;
- Communications and internet information such as identification codes and passwords, on line data such your IP address,

For some of Services, we may also collect sensitive information about you. This information will only be processed where data protection law allows this using a specific lawful justification, under one of the following bases where the processing is necessary:

- for the purposes of carrying out the obligations and exercising the rights and obligations of you or the Company;
- for the purposes of preventive or occupational health safety legal requirements;
- to protect your vital interests or of another person where you are physically or legally incapable of giving consent (for example in exceptional emergency situations, such as a medical emergency); or
- for the establishment, exercise or defense of legal claims.

If Personal Information relating to criminal convictions and offences is collected about you, it will only be processed where authorized by applicable laws, for example:

- a criminal record check may be carried out where authorized by applicable laws; or

- an allegation of a criminal offence or conviction arising during your relationship with SGS may be processed where required or authorized. For example, where we have a legal or regulatory requirement to report an offence, or applicable laws authorize SGS to process information about the offence for the purposes of making decisions regarding your relationship with SGS.

We most often collect personal data directly from you. We may also obtain personal data about you from other sources such as former clients when gathering references (in such cases we will inform you that we have received such information about you).

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 Freelance, 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 Freelance, 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 Freelance' 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 Freelance to send information related to the Service contracted;
 - Help SGS to obtain more information about its Freelance,

the Services that they provide, and other Services they can provide;

- Assess claims and defending in legal disputes;
- Guarantee SGS IT security and environment infrastructure; and
- Carry out risk management and compliance task.

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 Freelance 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 other SGS affiliates in order to to comply with contractual obligations with its Freelance and ensure a constant quality level through our Group:
 - Those responsible for managing or making decisions in connection with your relationship with the SGS or involved in

a process concerning your relationship with SGS;

- System administrators such as Finance for payment purposes; Information Technology for IT access purposes; reporting teams for business purposes; legal and compliance for compliance violation purposes or litigation purposes, Operational Integrity for safety and health management purposes or work accidents information when required for HSE purposes;
- All employees of SGS worldwide for the purposes of simple 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 profile may also be accessible to other colleagues via the SGS's SharePoint.

SGS Group Affiliates will act as data processors appointed pursuant to art. 28 GDPR or as autonomous data controllers depending on the circumstances and purposes.

- 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, subcontractors. When we do so we take steps to ensure they meet our data security standards, so that your Data remains secure. In that cases, we take steps to ensure that our data security standards are met so that the Data provided remains secure.

The Data contained in the computer systems can be accessible by the providers of such systems who perform tasks on behalf of SGS and following SGS instructions in order to maintain and host such computer systems. In such cases, the Data will only be disclosed to these third parties to the extent necessary to provide the services required by SGS.

- c) to authorities, entities 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 personal information is mainly processed within the European Economic Area (EEA), however from time to time your personal information (including special categories of personal information) will be transferred elsewhere in the world to SGS group companies or third parties to process, for the purposes described in this Privacy Notice.

Your personal information may be transferred to countries whose data protection laws may be less stringent than yours. Where this is the case, the SGS will ensure that appropriate or suitable safeguards are in place to protect your personal information and that its transfer is in compliance with applicable data protection laws. Where required by applicable data protection laws, SGS will ensure that service providers (including other SGS associated companies) sign standard contractual clauses as approved by the European Commission or other supervisory authority with jurisdiction over the relevant Company exporter.

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

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. We expect all Freelancer to contribute to the security of the SGS Group by following security policies and procedures, completing assigned trainings, and reporting suspected incidents to 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

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 Freelance 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 Data privacy notice was updated in October 2021. SGS reserves the right to amend it from time to time. If the notice has been updated, SGS will take steps to inform its Supplies of the update by appropriate means, depending on how SGS normally communicate with such Freelance.