





DATA PROTECTION

GROUP POLICY

SIOEN INDUSTRIES

A DIVERSIFIED STOCK QUOTED GROUP WITH AN EXTENSIVE PORTFOLIO OF PRODUCTS AND ACTIVITIES: SPINNING, WEAVING, AND COATING OF TECHNICAL TEXTILES, MANUFACTURER OF PROFESSIONAL PROTECTIVE CLOTHING AND PRODUCER OF FINE CHEMICALS.

 <p>+4 000 people</p>	 <p>+50 plants</p>		 <p>+20 countries</p>
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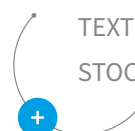
THE **+** OF SIOEN

SINCE **1960**

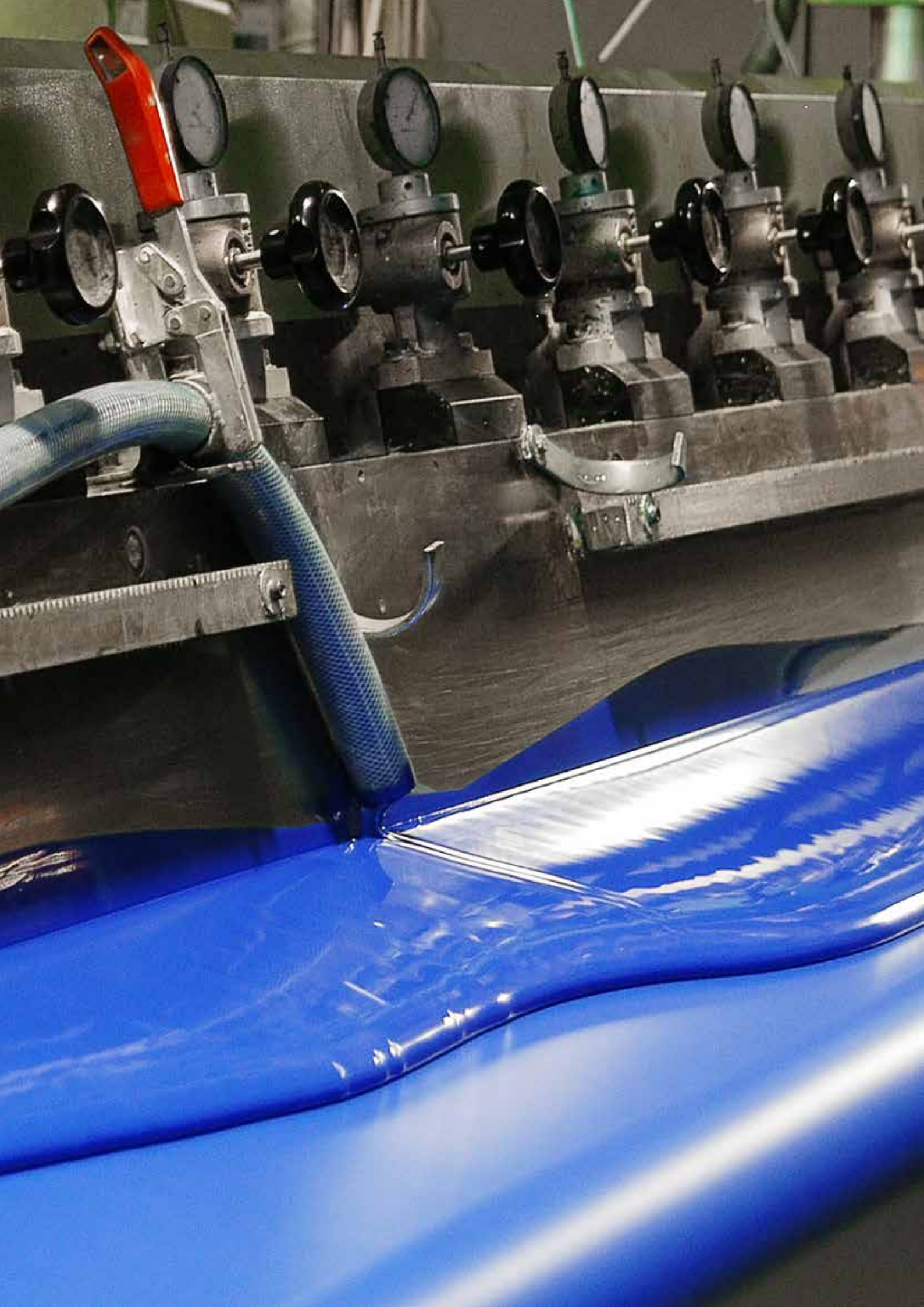
TURNOVER OF **468 MILLION**

TEXTILE SOLUTION PROVIDER

STOCK QUOTED



We are **world market leader** in technical textiles and technical apparel, protecting people and their belongings.



1. TABLE OF CONTENTS

1. SCOPE AND APPLICATION	6
2. FAIRNESS AND PURPOSES FOR PROCESSING PERSONAL DATA	7
3. USE OF PERSONAL DATA FOR OTHER PURPOSES	8
4. PROCESSING SENSITIVE DATA	9
5. DATA MINIMISATION	9
6. RETENTION	10
7. INFORMING THE INDIVIDUAL & RIGHTS OF THE INDIVIDUAL	10
8. DIRECT MARKETING	12
9. AUTOMATED DECISION MAKING	12
10. SECURITY	12
11. TRANSFER OF PERSONAL DATA TO THIRD PARTIES	13
12. OVERRIDING INTERESTS	15
13. THIRD PARTY BENEFICIARY RIGHTS	16
14. COMPLAINTS	16
15. LEGAL	16
16. TRAINING	16
17. COMPLIANCE	17
18. AUDIT	17
19. PUBLICATION – CHANGES	17
20. ANNEXES	18

General

Introduction

The Sioen Industries Group Data Protection Policy ('Policy') outlines how the Sioen Industries Group treats Personal Data of current, former and prospective employees, contractors, customers, consumers, suppliers and vendors ('Individuals') and sets out its approach to privacy and data protection compliance.

All Sioen Industries Group Companies as listed in the Annexes hereto ('Sioen') and their employees must comply with this Policy when processing and transferring **Personal Data**.

Personal Data is defined as any information relating to an identified or identifiable natural person.

1. SCOPE AND APPLICATION

As a global company, Sioen processes and transfers Personal Data between the Sioen Industries Group Companies for regular Business Purposes such as recruitment, payroll and other HR processes. Sioen further processes customer, supplier, vendor and employee data for Business Purposes, the administration of its contractual obligations and to fulfil its legal reporting duties.

Processing refers to automated as well as manual processing and means any operation or set of operations performed on personal data such as collection, storage, structuring, adaptation, alteration, consultation, retrieval, erasure, destruction,

This Policy also ensures that Personal Data receives the same level of protection when it is transferred between Sioen Industries Group Companies globally and equally applies when a Sioen Industries Group Company Processes Personal Data on behalf of other Sioen Industries Group Companies (Intra-Group Processing).

The geographical scope of this Policy applies to all Personal Data being processed by Sioen globally.

2. FAIRNESS AND PURPOSES FOR PROCESSING PERSONAL DATA

Art 2.1.

Sioen commits to Process Personal Data in a fair and lawful manner.

Personal Data shall be collected, used, transferred or otherwise Processed for specific and legitimate purposes such as the following purposes (Business Purposes) :

a. Legitimate purposes as appropriate to Sioen business

Processing necessary for activities such as :

- the conclusion and execution of agreements with suppliers; customers; other business partners;
- marketing, sales, promotion;
- account management;
- customer services;
- finance and accounting;
- research & development;
- purchasing;
- internal management and control;
- investor relations;
- external communications;
- government and legal affairs;
- alliances, ventures, mergers, acquisitions and divestitures;
- intellectual property management;
- HR related activities (a.o. payroll administration).

b. Business process execution and internal management

Processing necessary for activities such as managing company assets, conducting internal audits, investigations, and implementing business controls;

c. Health, safety and security

Processing necessary for activities such as health & safety, security, access rights ...;

d. Compliance with legal obligations

Processing necessary for compliance with a legal obligation to which Sioen is subject;

e. Vital interests

Processing necessary to protect a vital interest of an Individual.

Art 2.2.

If none of the criteria listed above are applicable or if consent is required by applicable local law, Sioen shall obtain consent from the Individual before Processing Personal Data. When seeking consent, Sioen shall inform the Individual of :

- the purpose of the Processing for which consent is requested; and
- any other relevant details to ensure fair Processing (see also article 7 : Informing the Individual and rights of the Individual)

If the Processing is reasonably necessary to fulfil a request of the Individual (e.g. subscribing to a service), the Individual's consent is implied.

Art 2.3.

The Individual may deny or withdraw consent at any given time.

Processing will be discontinued unless Sioen has taken action that relies upon the previously provided consent. In such case, Sioen will discontinue processing as soon as reasonably practical.

Art 2.4.

Where Personal data has not been obtained from the Individual, the obligation to inform the Individual does not apply if the provision of such information proves impossible or would involve a disproportionate effort.

3. USE OF PERSONAL DATA FOR OTHER PURPOSES

Art 3.1.

Personal Data will only be Processed for the purposes for which they were originally collected (Original Purpose).

Personal Data may be Processed for a legitimate Business Purpose different from the Original Purpose (Secondary Purpose), only if the Original Purpose and the Secondary Purpose are closely related.

If there is a potential harm to the Individual as a result of the Processing of the Individual's Personal Data for a close-related Secondary Purpose, additional measures such as one or more of the following may be required:

- a. limiting access to the Personal Data;
- b. implementing additional confidentiality and security controls;
- c. informing the Individual about the Secondary Purpose;
- d. providing an opt-out opportunity;
- e. obtaining Individual consent in accordance with article 2.2;
- f. anonymization of the Personal Data.

If Personal Data are Processed for a Secondary Purpose that is not closely related to the Original Purpose, items d) and e) need in any event to be complied with unless f) is applicable.

Art 3.2.

It is permitted to Process Personal Data for one or more of the following Secondary Purposes provided appropriate additional measures are taken in accordance with article 3.1

- a. transferring Personal Data to the archive;
- b. conducting internal audits or investigations;
- c. implementing business controls;
- d. conducting statistical, historical, scientific research as required for the business operations of Sioen;
- e. preparing for or engaging in dispute resolution;
- f. using legal or business consulting services;
- g. managing insurance issues;
- h. (new) application testing and user training.

4. PROCESSING SENSITIVE DATA

Sensitive Personal Data is data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership and the Processing of data concerning health or medical conditions.

Sensitive Personal Data shall only be processed by Sioen with the Individual's explicit consent, or in the event Sioen can rely on an alternative legal basis, permission or requirement under applicable law for such Processing without consent.

5. DATA MINIMISATION

Sioen shall restrict the Processing of Personal data to those Data that are reasonably adequate for and relevant to the applicable Business Purpose. Sioen shall take reasonable steps to securely delete or destroy Personal data that are not required for the applicable Business Purpose.

Personal Data should be accurate, complete and kept up to date to the extent reasonably necessary for the applicable Business Purpose.

It is also the responsibility of the Individual to inform Sioen if the Personal Data are inaccurate, incomplete or outdated. Sioen shall rectify the data as prescribed by art. 14 of this Policy.

6. RETENTION

Sioen shall generally retain Personal Data only :

- i. for the period required to serve the applicable Business Purpose;
- ii. to the extent reasonably necessary to comply with an applicable legal requirement;
- iii. in light of an applicable statute of limitations, Sioen may specify a time period for which certain categories of Personal Data will be kept.

After the applicable retention period has ended, the Personal Data shall be :

- i. securely deleted and destroyed;
- ii. de-identified;
- iii. transferred to an archive (unless this is prohibited by applicable local law).

Personal Data can be included in system backups for recovery purposes in case of disaster or data corruption.

7. INFORMING THE INDIVIDUAL & RIGHTS OF THE INDIVIDUAL

Art 7.1.

The Individual has the right to be informed by Sioen about :

- i. the Business Purposes for which Personal Data are Processed;
- ii. which Sioen Industries Group Company is responsible for the Processing;
- iii. other relevant information such as the nature of the Processed Personal Data, the categories of Third Parties to which the Personal Data are disclosed and if applicable, how the Individual can exercise his/her rights.

To the extent required by applicable law, where Personal Data have not been obtained directly from the Individual, Sioen shall provide the Individual with information no later than the moment the Personal Data are recorded in a Sioen database.

Art 7.2.

The requirements in 7.1 may be overhauled if it is impossible to inform the Individual or if such provision of information would result in a disproportionate cost.

Art 7.3.

Individuals have the right to request an overview of their Personal Data Processed by or on behalf of Sioen.

Where reasonably possible, the overview shall contain information regarding the source, type, purpose and categories of recipients of the Personal Data.

If the Personal Data are incorrect, incomplete or not Processed in compliance with applicable law or this Policy, the Individual has the right to have his/her Personal Data rectified, deleted or blocked.

The Individual has the right to object to the Processing of his/her Personal Data on the basis of compelling grounds related to his/her particular situation.

To access, rectify, delete or block Personal Data or to object to the Processing, the Individual should send his/her request or objection to the contact person indicated in the relevant privacy policy or, if not specified, by emailing dataprotection@sioen.com.

Prior to fulfilling the request of the Individual, Sioen may require the Individual to :

- i. specify the type of Personal Data in question;
- ii. specify, where possible the data system in which the Personal Data are likely stored;
- iii. specify the circumstances in which Sioen has obtained the Personal Data;
- iv. show proof of the Individual's identity;
- v. specify the reasons why the Personal Data are incorrect, incomplete or not Processed in accordance with applicable law or this Policy.

Within four weeks of Sioen receiving the request or the objection, the Individual shall be informed in writing of Sioen's position with regard to the request and any actions taken in this regard.

Sioen may deny a request or objection by an Individual if :

- i. the request or objection does not meet the requirements of articles 7.1 and 7.2;
- ii. the identity of the Individual can not be established by reasonable means;
- iii. the request or objection is made with an unreasonable time interval of a prior request or objection or otherwise; or constitutes an abuse of rights, for instance because of its repetitive character. A time interval between requests of six months or less shall generally be considered to be an unreasonable time interval;
- iv. the Processing of the Personal Data of the Individual is necessary for the fulfilment of legal obligations.

Art 7.4.

Any Individual may file a complaint in accordance with article 14 of this Policy if the response to the request is unsatisfying to the Individual or the Individual has not received a response at all.

8. DIRECT MARKETING

When Processing Personal Data for the purpose of direct marketing communications, Sioen will obtain prior consent of the Individual (opt-in).

In every direct marketing communication by Sioen the Individual shall have the option to opt-out further marketing communication.

In the case of objection by an Individual to further receive direct marketing communications from Sioen, Sioen will take the necessary steps to refrain from further sending direct marketing communications within a period of one (1) month.

9. AUTOMATED DECISION MAKING

Automated tools may be used to make decisions about Individuals but decisions may not be based solely on the results provided by the automated tool. This restriction does not apply if :

- the use of automated tools is authorized or required by law;
- the decision is made by Sioen for purposes of entering into or performing a contract provided that
 - the underlying request leading to a decision by Sioen was made by the Individual;
 - suitable measures are taken to safeguard the legitimate interests of the Individual.

10. SECURITY

Sioen shall take all appropriate commercially reasonable technical, physical and organizational measures to protect Personal Data from misuse or accidental, unlawful or unauthorized destruction, loss, alteration, disclosure, acquisition or access.

Staff shall only be provided access to Personal Data relevant to perform their duties and serve the Business Purposes for which the Personal Data has been provided by the Individual.

Staff who access Personal Data are bound by confidentiality obligations as implied by their employment agreement with Sioen.

Where a Sioen Industries Group Company Processes Personal Data on behalf of another Sioen Industries Group Company it will adhere to this Policy and act only upon the instructions of the Sioen Industries Group Company on whose behalf the Processing is carried out. Sioen maintains processes to ensure that prior to the transfer of Personal Data to another Sioen Industries Group Company, the receiving Sioen Industries Group Company is bound by this Policy and will abide by the applicable data protection legislation;

11. TRANSFER OF PERSONAL DATA TO THIRD PARTIES

Art 11.1.

A transfer of Personal Data to Third Parties includes the following situations :

- i. Sioen discloses Personal Data to Third Parties; or
- ii. Sioen provides remote access to Personal Data to a Third Party.

There are two categories of Third Parties :

- i. Third Party Data Processors : these are Third Parties that Process Personal Data solely on behalf of Sioen and at its instruction (e.g. the use of Third Party CRM tools); and
- ii. Third Party Data Controllers : these are Third Parties that Process Personal Data and determine the purposes and means of Processing (e.g. Sioen Business Partners that provide their own goods/services to Customers).

Sioen shall transfer Personal Data to a Third Party only as necessary to serve the Business Purpose for which the Personal Data has been provided (including Secondary Purposes or for purposes for which the Individual has provided his/her consent in accordance with article 2.2).

Third Party security reviews are conducted to ensure the Third Parties whom are being entrusted with Personal Data offer an adequate level of protection. Sioen will also enter into contractual arrangements with these Third Parties to ensure they have implemented adequate technical and organizational measures to protect the security and confidentiality of the Personal Data.

Sioen shall always seek to contractually protect the Personal Data interests of Individuals.

Art 11.2.

Third Party Data Controllers (other than public authorities) may Process Personal Data obtained in connection with their relationship with Sioen only if they have a written agreement concerning this with Sioen.

Business Contact Information may be transferred to a Third Party Data Controller without a contract if it is reasonably expected that such information will be used by the Third Party Data Controller to contact the Individual for legitimate Business Purposes related to such Individual's job responsibilities.

Sioen shall not transfer Business Contact Information in bulk to a Third Party Data Controller without consent except as permitted or required under applicable law and to the extent such transfer serves a legitimate Business Purpose.

Art 11.3.

Third Party Data Processors may Process Personal Data only if the Third Party Data Processor has a written contract with Sioen. This contract shall include provisions addressing the following :

- i. the Third Party Data Processor shall Process Personal Data only in accordance with Sioen instructions and for the purposes authorized by Sioen;
- ii. the Third Party Data Processor shall keep all Personal Data confidential;
- iii. the Third Party Data Processor shall take appropriate technical, physical and organizational security measures to protect the Personal Data;
- iv. the Third Party Data Processor shall not permit subcontractors to Process Personal Data in connection with its obligations to Sioen without the prior written consent of Sioen;
- v. Sioen shall have the right to review the security measures taken by the Third Party Data Processor and the Third Party Data Processor shall submit its relevant data processing facilities to audits and inspections by Sioen or by any relevant government authority;
- vi. the Third Party Data Processor shall promptly inform Sioen of any Information Security Incident involving Personal Data.

Art 11.4.

The following provision applies to the transfer of Personal Data to a Third Party located in a country considered not to provide an 'adequate level of protection' for Personal Data (Non-Adequate Country).

Non-Adequate Countries are countries that are not on the list of Adequate Countries as provided by the European Commission and which can be consulted on the website of the European Commission.

Personal Data may be transferred to a Third Party located in a Non-Adequate Country only if :

- i. contract has been concluded between Sioen and the relevant Third Party that provides safeguards at a similar level of protection as that provided by this Policy;
- ii. the Third Party has implemented binding corporate rules or a similar transfer control mechanism which provides adequate safeguards as required under applicable law;
- iii. the transfer is necessary for the execution of a contract with a customer, supplier or business partner or to take necessary steps at the request of a customer, supplier or business partner prior to entering into a contract;
- iv. the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the Individual between Sioen and a Third Party (e.g. in the case of a recall);
- v. the transfer is necessary to protect a vital interest of the Individual;

- vi. the transfer is necessary for the establishment, exercise or defense of a legal claim;
- vii. the transfer is required by any law to which the relevant Sioen Group company is subject;
- viii. or the Individual has consented to such transfer.

When seeking consent pursuant to 11.4.viii, the Individual shall be provided with the following information :

- a. the purpose of the transfer;
- b. the identity of the transferring Sioen Industries Group Company;
- c. the identity or categories of Third Parties to which the Personal Data will be transferred;
- d. the country to which the Personal Data will be transferred;
- e. the fact that the Personal Data will be transferred to a Non-Adequate Country.

12. OVERRIDING INTERESTS

Some of the obligations of Sioen or rights of Individuals under this Policy may be overridden if, under certain specific circumstances, a pressing legitimate need requires to outweigh the interests of the Individual (Overriding Interest).

An Overriding Interest may exist if there is a need to :

- (a) protect a legitimate business interest of Sioen including:
 - the health, security or safety of Individuals;
 - Sioen IP rights, trade secrets or reputation;
 - the continuity of the Sioen Group business operations;
 - the preservation of confidentiality in a proposed sale, merger or acquisition of a business; or
 - the involvement of trusted advisors or consultants for business, tax, insurance or legal purposes.
- (b) prevent or investigate suspected or actual violations of law, contracts or Sioen policies; or
- (c) otherwise protect or defend the rights or freedoms of Sioen, its Staff or other Individuals.

In the event of an Overriding Interest, one or more of the following obligations for Sioen may be ignored: articles 3 (Use of Personal Data for Other Purposes), 7 (Informing the Individual), 10 (Security) , 11 (Transfer of Personal Data to Third Parties).

The Individual shall be informed of the Overriding Interest causing Sioen to set aside its obligations or the rights of the Individual.

13. THIRD PARTY BENEFICIARY RIGHTS

Individuals whose Personal Data are subject to EU Regulation 2016/679 and transferred to a Sioen Industries Group Company outside of Europe (Beneficiary/Beneficiaries) may seek enforcement of this Policy as third party beneficiaries by :

- filing a complaint with each Sioen Industries Group Company that Processes their Personal Data or by contacting the Sioen Legal Dept as set forth in article 14 of this Policy;
- lodging a complaint with a national data protection authority of the competent jurisdiction;
- or bringing proceedings against (a) Sioen Industries NV in the courts of Belgium or (b) each Sioen Industries Group Company located in Europe, that transferred the Personal Data in their respective jurisdictions.

14. COMPLAINTS

Individuals may file a complaint regarding compliance with this Policy in accordance with the complaint procedure set forth in the relevant privacy policy, privacy notice, contract provision or by emailing dataprotection@sioen.com.

All complaints will be handled in an independent manner.

Sioen equally welcomes any suggestions, questions or comments regarding privacy related matters.

Staff are required to report any complaints or privacy incidents.

15. LEGAL

Personal Data shall be Processed as prescribed by EU Regulation 2016/679 (the General Data Protection Regulation).

Where this Policy provides more protection than the applicable law, this Policy shall apply.

Individuals keep any rights they may have under local law. Local public authorities having jurisdiction over the relevant matters maintain their authority.

16. TRAINING

Sioen will provide appropriate training to Staff having permanent and/or regular access to Personal Data and/or the Processing of Personal Data.

17. COMPLIANCE

Art 17.1.

Each Sioen Industries Group Company shall appoint one Privacy Officer, creating a group-wide network of Privacy Officers.

The Privacy Officer shall be the single point of contact for the respective Sioen Group Company regarding all Personal Data related matters. The Privacy Officer shall be responsible for ensuring compliance at the respective company level, will handle local complaints from data subjects and is required to report any major privacy issues to the Legal Department.

The network of Privacy Officers shall report to the Legal Department of Sioen Industries NV.

The Legal Department informs the Board of Directors on all Data Protection related matters and will be responsible for all communication with Data Protection Authorities.

Art 17.2.

All Sioen Group Companies shall cooperate and assist in handling a request or complaint from an Individual or a Data Protection Authority.

Art 17.3.

Any advice by a Data Protection Authority on the interpretation of this Policy shall be followed.

18. AUDIT

In addition to the work of the network of Privacy Officers, audits will regularly be performed to ensure our compliance with this Policy. Audit findings will be reported to management and will include the follow-up on corrective measures to be taken.

19. PUBLICATION – CHANGES

This Policy will become effective on 25.05.2018 and applies to the Processing of all Personal Data by Sioen Industries Group Companies on or after that date. This Policy may be adjusted or changed if necessary, for example to ensure compliance with local law.

Sioen will take the necessary measures to ensure that new Companies to the Sioen Industries Group will comply with this Policy.

Personal Data transfers to new Companies will not take place before they are effectively bound by this Policy and are able to comply.

This Policy will be publicly made available through the Sioen website(s) and the Sioen intranet.

20. ANNEXES

- List of entities bound by this Policy

Annex 1 – List of Sioen Industries Group Entities bound by this Policy

Company name	Country
Sioen Industries NV	Belgium
Sioen NV	Belgium
European Master Batch NV	Belgium
Coatex NV	Belgium
Sioen Fabrics SA	Belgium
Sioen Felt & Filtration SA	Belgium
Dynatex NV	Belgium
Sioen Nederland B.V.	The Netherlands
Roltrans Tegelen B.V.	The Netherlands
Saint Freres SAS	France
Saint Freres Confection SAS	France
Sioen France SAS	France
Richard SAS	France
Dimension Polyant SAS	France
Dimension-Polyant GmbH	Germany
Sioen Deutschland GmbH	Germany
Fontana International gmbH	Austria
Mullion Survival Technology LTD	United Kingdom
Dimension-Polyant LTD	United Kingdom
James Dewhurst LTD	United Kingdom
Jade Equity Ltd	United Kingdom
Gairmeidi Caomhnaithe Dhun Na Ngall Teoranta	Ireland
Manifattura Fontana S.P.A.	Italy
Siofab SA	Portugal
Siorom S.R.L.	Romania
Ursuk Oy	Finland
Sioen Ballistics Oy	Finland
SG Balticum AS	Estonia

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