



TCR GROUP GLOBAL PRIVACY NOTICE

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1. PURPOSE AND CONTEXT

In the course of carrying out our activities, the TCR Group (as defined below) (**TCR** or **we**) collects and uses 'Personal Data', i.e., information which relates to an identified or identifiable natural person (a **Data Subject**).

Throughout the world, the Processing (as defined below) of Personal Data is regulated by data protection (privacy) laws and regulations (**Data Protection Legislation**), including the European Union, any Processing of Personal Data must comply with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the Processing of Personal Data and on the free movement of such data (the **GDPR**).

In some parts of the world, such as in the European Union, the Data Protection Legislation obliges TCR, amongst others, to inform Data Subjects (as defined below) about how TCR processes Personal Data.

Data Subjects may be Staff (Annex 1), Job Applicants (Annex 2), Customers (Annex 3), Suppliers (Annex 4), Website Users (Annex 5) and Site Visitors (Annex 6).

This TCR Group Global Privacy Notice (this **Notice**), read together with the relevant Annex, provides you, the Data Subject, with the following general information on the collection, processing, and transfer of Personal Data: (i) the identity and the contact details of TCR (ii) the purposes of the Processing of Personal Data as well as the legal basis for the Processing, including, where applicable, information on TCR's legitimate interests; (iii) the categories of Personal Data and Data Subjects concerned; (iv) the sources from which the Personal Data originate; (v) the recipients or categories of recipients to whom TCR may disclose the Personal Data; (vi) information about transfers of Personal Data to countries outside of the European Economic Area and the suitable safeguards put in place; (vii) the period during which the Personal Data will be stored or the criteria used to determine that period; (viii) a general description of the technical and organizational security measures and (ix) general information on the rights that you may have as a Data Subject under relevant Data Protection Legislation.

The body of this Notice provides general information on the Processing of Personal Data by TCR and applies irrespective of the category of Data Subject. Each of the Annexes to this Notice provides more detailed information on the Processing of Personal Data with respect of a specific category of Data Subject (e.g., employees, suppliers, etc.). The body of this Notice should be read together with the relevant Annex(es). However, for the sake of clarity, TCR's commitment to and compliance with this Notice and the relevant Annex(es) is only to the extent that this Notice and the relevant Annex(es) or their content are mandatory under the applicable Data Protection Legislation.

TCR is responsible for the Processing of your Personal Data and will process your Personal Data in accordance with this Notice and the relevant Annex(es), and in accordance with the obligations of the Data Protection Legislation.

2. WHAT DO THE KEY TERMS MEAN?

<i>Controller</i>	means the person who determines, alone or jointly with others the purposes for which, and the manner in which, any Personal Data is, or is likely to be, processed. The Controller of your Personal Data is determined by the relevant Annex and depends on the type of Data Subject: Staff (Annex 1), Job Applicants (Annex 2), Customers (Annex 3), Suppliers (Annex 4), Website Users (Annex 5) and Site Visitors (Annex 6).
<i>Data Subject</i>	means an identified or identifiable natural person. For the Processing of your Personal Data, you are considered to be the Data Subject.
<i>Judicial Data</i>	means Personal Data relating to criminal convictions and offences or related security measures.
<i>Personal Data</i>	means any information which relates to a natural person. The latter is someone who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.
<i>Processing</i>	means every operation or set of operations involving data, whether or not performed by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of data.
<i>Sensitive Personal Data</i>	means Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the Processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

Such data are subject to additional safeguards and must be handled with care.

TCR Affiliate means any subsidiary or holding companies of TCR including the ultimate holding company of TCR and any subsidiary of any of those subsidiaries or holding companies.

TCR Group means TCR International and/or any and/or all of the TCR Affiliates.

TCR International means T.C.R. International NV/SA, with registered office at 1820 Steenokkerzeel (Belgium), Vliegveld 109, registered in the Crossroads Bank for Enterprises under number 0465.870.115.

3. WHAT ARE THE DATA PROTECTION PRINCIPLES?

TCR will adhere to the following principles when Processing your Personal Data:

i. Lawfulness, fairness and transparency

TCR will process your Personal Data in a lawful, fair and transparent manner. You will read more about this in this Notice and in the relevant Annex. When we collect additional Personal Data from you, we will provide you with more information on how we intend to use such data, including details on the identity of the Controller, the purposes of the Processing, with whom we can share your data, any envisaged transfer of your Personal Data outside the EEA and further information necessary to ensure a fair and transparent Processing.

ii. Purpose limitation

TCR will process your Personal Data only for the purposes defined at the time of collection of the data. Subsequent changes to the purposes are only possible to a limited extent and will in some cases require your consent.

iii. Data minimisation

TCR will only process Personal Data about you that are adequate and relevant for the purposes for which TCR processes the data. Any Processing of Personal Data is limited to what is necessary in order to achieve the purposes for which such data are being processed. Where the purpose allows and where the expense involved is in proportion with the goal being pursued, TCR will use anonymised or pseudonymised data. We will not collect Personal Data in advance and store such data for potential future purposes, unless required or permitted by Data Protection Legislation.

iv. Accuracy

TCR is committed to ensure that your Personal Data are correct, complete, and are kept up-to-date. TCR will take suitable steps to ensure that inaccurate or incomplete data are deleted, corrected, completed or updated. Each time there is a change in your Personal Data, you should contact us immediately and spontaneously. If you believe your Personal Data are incorrect, incomplete or no longer up-to-date, you should contact us to have such data corrected and/or completed (see also Section 8).

v. Data retention

TCR will not keep your Personal Data longer than necessary for the purposes for which TCR processes your data. Data that are no longer needed after the expiration of statutory limitation periods or business process related periods, will be deleted. There may be an indication of interest that merit protection in individual cases. If so, TCR will keep your Personal Data until the interests that merit protection, have been clarified legally (e.g., we may be faced with a request for disclosure, which prevents us from deleting certain Personal Data).

vi. Integrity and confidentiality

TCR will process your Personal Data in a manner that ensures appropriate security of your data, including protection against unauthorised or unlawful Processing and against accidental loss, destruction or damage, by taking appropriate technical and organizational measures.

4. WHO RECEIVES YOUR PERSONAL DATA? - TRANSFERS OF PERSONAL DATA

Within the TCR Group, Personal Data may be transferred to and accessed by persons or entities who need such data to fulfill the purposes for which Personal Data are processed.

Due to the global nature of our business and organizational structure, we may also transfer your Personal Data to other entities of the TCR Group, some of which may be located in countries outside of the European Economic Area (**EEA**).

In some cases, we transfer your Personal Data to third party service providers only on TCR instructions.

In cases where your Personal Data is transferred from the EEA to a country outside of it, we will ensure that appropriate safeguards are in place to protect your Personal Data to standards equivalent to the standards contained in this Notice and the relevant Annex. In other words, TCR will remain responsible for the Processing of your Personal Data and will take the necessary measures to protect the Processing thereof (through, for example, the use of the EU Standard Contractual Clauses (**SCC**)).

5. HOW SECURELY ARE YOUR PERSONAL DATA STORED?

TCR's Information Security Policy defines the importance of information security for TCR management and what needs to be done to ensure the protection of information and information systems. TCR's Information Security Governance Manual defines what information security is and how it shall be organised, structured and managed within TCR.

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, TCR has implemented appropriate technical and organizational measures to prevent or act against any unauthorized and unlawful Processing or disclosure, as well as accidental loss, modification or destruction of Personal Data.

Such technical and organizational measures include, *inter alia*, as appropriate:

- (i) the pseudonymisation and encryption of personal data;
- (ii) the ability to ensure the ongoing confidentiality, integrity, availability and resilience of Processing systems and services;
- (iii) the ability to restore the availability and access to Personal Data in a timely manner in the event of a physical or technical incident; and/or
- (iv) a process for regularly testing, assessing and evaluating the effectiveness of technical and organizational measures for ensuring the security of the Processing.

Before new methods of data Processing are being introduced (particularly new IT systems), TCR will define and implement any appropriate technical and organizational measures if needed.

Third party service providers are obligated to comply with certain contractual requirements when handling TCR Personal Data.

TCR ensures your Personal Data are stored securely, whether on paper or electronically.

6. WHAT ARE YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA?

As Data Subject, you have the following rights towards TCR as Controller:

Description	When is this right applicable?
<p>Right of access. You have the right to obtain, upon your request, certainty about whether or not TCR processes Personal Data, information regarding such Processing and access to your Personal Data.</p>	<p>This right is applicable at all times, subject to certain exemptions implying that some of the requested information will not be provided, e.g.</p> <ul style="list-style-type: none"> - information other than your Personal Data; - information that also relates to a third party where it is not reasonable to disclose the information without the consent of that third party; and - information that is already available to you.
<p>Right to rectification. You have the right to ask us to correct incorrect or outdated Personal Data, to complete Personal Data and have recipients to whom Personal Data were provided informed of such rectification.</p>	<p>This right is applicable at all times (subject to certain exemptions).</p>
<p>Right of erasure. You have the right to have your Personal Data erased in certain circumstances upon your request.</p> <p>In case your Personal Data were made public, TCR will take reasonable steps to inform the Controllers who are Processing the Personal Data of your request to erase your Personal Data and to inform the recipients of Personal Data of your request to erase your Personal Data.</p>	<p>Examples of when this right applies include (subject to certain exemptions):</p> <ul style="list-style-type: none"> • when we no longer need your Personal Data for the purpose(s) we collected it; • if you withdraw consent to our use of your Personal Data and no other legal ground supports our continued use of your Personal Data; • if you would object to the way we use your Personal Data and we have no overriding grounds to continue using it; • if we have used your Personal Data unlawfully; and • if your Personal Data needs to be erased for compliance with law.
<p>Right to restriction of Processing. You have the right to obtain, upon request, restriction of the Processing of your Personal Data, and in case of restriction, limitation of the Processing to mere storage.</p>	<p>This right applies when:</p> <ul style="list-style-type: none"> • you contest the accuracy of your Personal Data, for a period enabling us to verify the accuracy of your Personal Data;

	<ul style="list-style-type: none"> • the processing is unlawful and you oppose to the erasure of your Personal Data and request the restriction of their use instead; • we no longer need your Personal Data for the purposes of the Processing, but they are required by you for the establishment, exercise or defense of legal claims; and • you have objected to the Processing on the basis of our legitimate interest, pending the verification whether our legitimate grounds override those of you. <p>Where the Processing has been restricted, such Personal Data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defense of legal claims, for the protection of the rights of another natural or legal person, or for reasons of important public interest.</p> <p>We will always inform you before lifting the restriction of Processing of your Personal Data.</p>
<p>Right to Personal Data portability. Subject to certain exemptions, you have the right to obtain, upon your request, your Personal Data and to reuse them as you wish. If you request so, TCR has the obligation to transfer your Personal Data directly to another Controller.</p>	<p>This right will only apply:</p> <ul style="list-style-type: none"> • to Personal Data you provided to us; • where we have justified our use of Personal Data based on: <ul style="list-style-type: none"> ○ your consent; or ○ our performance of a contract with you; and • if our use of Personal Data is by electronic means.
<p>Right to object. You have the right to object to the Processing of your Personal Data based on certain grounds and with certain purposes and the right to at all times object to the use of your Personal Data for direct marketing purposes.</p>	<p>You can only object to our use of your Personal Data where you have particular grounds and the legal ground we rely on for using your Personal Data is in our (or a third party's) legitimate interests.</p> <p>However, we may continue to use your Personal Data, despite your objection, where there are compelling legitimate grounds to do so or where we need to use your Personal Data in connection with any legal claims.</p>
<p>Right to withdraw consent. In case you have given your consent for our Processing of your</p>	<p>This right applies where we process your Personal Data based upon your consent or upon legitimate interests of the Controller. Withdrawal</p>

Personal Data, you have the right to withdraw your consent at any time.	of consent has effect for the future only and does not affect the lawfulness of Personal Data processed up until the withdrawal.
Automated individual decision-making, including profiling. In case of automated individual decision-making (for example a personality test), you have the right to obtain human intervention, give your point of view, receive an explanation for the automated decision, and challenge that decision.	In case of automated decision-making.

You can exercise your rights in connection with your Personal Data and we will endeavor to respond to such request within a reasonable period and at the latest within one (1) month. That period may be extended by two (2) further months where necessary, taking into account the complexity and number of the requests. We will inform you of any such extension within one (1) month of receipt of your request, together with the reasons for the delay.

7. HOW WILL WE ENSURE THAT YOUR PERSONAL DATA ARE CORRECT?

We want to ensure that the Personal Data we keep and process are accurate and kept up-to-date.

Each time there is a change in your Personal Data, you must immediately and spontaneously contact us (see Section 8). If you believe your Personal Data are incorrect, incomplete or no longer up-to-date, you should also contact us to have such data corrected and/or completed.

8. CONTACT

If you have any concerns about how TCR processes your Personal Data or if you wish to exercise any of your rights with respect to the Processing of your Personal Data, please contact us:

TCR International NV
Vliegveld 109
B-1820 Steenokkerzeel
BELGIUM
T +32 2 752 86 20
F +32 2 751 67 17
privacy@tcr-group.com

All questions and complaints will be investigated. We will resolve complaints and questions in conformity with our internal policies.

If you would not be satisfied by TCR's answer, you have the right to lodge a formal complaint with the relevant supervisory authorities. The supervisory authority of TCR International NV/SA is the Belgian Data Protection Authority (Drukpersstraat 35, 1000 Brussels, Belgium; contact@apd-gba.be; +32 (0)2 274 48 00).

9. AMENDMENTS

We reserve the right to amend, revoke or complement this Notice from time to time. You will of course be informed of any changes.

This Notice has been updated on 24th January 2019.

ANNEX 2 – JOB APPLICANTS

The TCR Group processes Personal Data of job applicants for recruitment and selection purposes. The purpose of this Annex is to inform you, as a job applicant, about how TCR processes your Personal Data. This Annex should be read together with the TCR Group Global Privacy Notice of which it forms part (the **Notice**), and, if so, local data protection notices for job applicants.

Data Subjects	Job applicants.
Controller	The Controller of your Personal Data is TCR International or the TCR Affiliate which you have sent your job application to.
Categories of Personal Data	<p>We process the following information about job applicants:</p> <ul style="list-style-type: none"> • Identification data (name, gender, date and place of birth, citizenship, marital status, etc.) • Contact information (address, (private) email address, (private) phone number, etc.) • Application data (CV, accompanying letter, education, formation, employment history, etc.) • Interview data (interview notes, evaluations, assessments, etc.) • Background check data (only to the extent legally permitted)
Sources	<p>Most of the Personal Data we process is information that you have knowingly provided to us either directly or through a recruitment process internet platform which TCR uses for the purposes of recruitment and selection. However, in some situations we may process Personal Data that we inferred from other information you have given us (CV, interview notes, conversations, details you submitted to TCR during the recruitment process), or Personal Data that we obtained from a third party with your knowledge (e.g., recruitment agencies, assessment centers).</p>
Purposes	<p>TCR processes your Personal Data for the following purposes:</p> <ul style="list-style-type: none"> • to communicate with you; • to consider you for possible employment; and • to assess and evaluate your eligibility as an employee (recruitment and selection). <p>TCR does not use Personal Data gathered in your capacity as job applicant for marketing purposes, except where TCR obtains your explicit consent to do so and provides you with the subsequent right to object at any time and at no charge to the Processing of Personal Data for marketing purposes.</p>
Legal Grounds	<p>TCR processes your Personal Data on the basis of the following legal grounds:</p> <p>(i) Necessary for taking steps prior to entering into a contract with you – TCR processes your Personal Data for the purpose of possibly concluding an employment contract with you.</p>

	<p>(ii) Legal obligation to which TCR is subject – TCR has to comply with laws and regulations, for example in the area of recruitment and selection. Therefore TCR will have to process certain of your Personal Data.</p> <p>(iii) Your consent – When you apply for a job at TCR and send us your application, we assume you consent to the processing of your Personal Data by TCR for recruitment and selection purposes. Note that you can withdraw your consent at any time.</p>
Disclosure	<p>The HR managers and other personnel involved in the recruitment and selection process have access to your Personal Data on a strictly '<i>need to know basis</i>'. Any other access to your Personal Data will only be given on a strictly '<i>need to know basis</i>' and insofar an adequate level of protection of your Personal Data is ensured.</p> <p>(i) TCR Group Some aspects of the HR function may be centralized at one or more entities of TCR Group in order to allow TCR to better manage and administer its business. This centralization may result in the transfer of Personal Data of job applicants from one TCR Affiliate to another. If you are being considered for a position within TCR Group in a different country, some of your Personal Data will be transferred to the country where the job opening is located. Your Personal Data may also be stored in centralized HR databases.</p> <p>(ii) Third parties For some of the abovementioned purposes, we may transfer your Personal Data to third parties, but only on a strictly '<i>need to know basis</i>'. These third parties may include third party service providers, such as recruitment and selection agencies, assessment centers, HR and IT (hosting) service providers, and legal and other professional advisers. To the extent that we outsource the Processing of Personal Data to a third party, we oblige this party to provide adequate protection of your Personal Data and prohibit any Processing for its own purposes. We may also transfer your Personal Data to other third parties when you have asked us to do so.</p>
Retention	<p>We will keep your Personal Data no longer than necessary for the recruitment and selection process. At the end of this period, we will ensure that your Personal Data are removed from our systems, unless you have consented to your Personal Data being included in a recruitment pool. In such case, your Personal data will be kept for an additional period of 12 months. In case you have become staff of TCR following such recruitment process and selection process, we will further keep your Personal Data in accordance with the Annex applicable for TCR staff.</p>

<i>Amendments</i>	We reserve the right to amend, revoke or complement this Annex from time to time. You will of course be informed of any changes.
<i>Last update</i>	This Annex has been updated on 13 th March 2019.

ANNEX 5 – WEBSITE USERS

This Annex describes Personal Data that TCR Group collects when you visit a website from the TCR Group (f.ex. www.tcr-group.com) (**Website User**) and informs you, as a Website User, about how TCR processes your Personal Data. This Annex should be read together with the TCR Group Global Privacy Notice of which it forms part (the **Notice**).

Data Subjects	Website Users.
Controller	The Controller of your Personal Data is TCR International.
Categories of Personal Data	<p>We process the following information about Website Users:</p> <ul style="list-style-type: none"> • Identification data (name, gender, etc.) • Contact information (function/title, address, email address, phone number, fax number, etc.) • Business information (enabling us to procure products and/or services) • Online activity information (information from your use of the TCR website, etc.)
Purposes	<p>TCR processes your Personal Data for the following purposes:</p> <ul style="list-style-type: none"> • to communicate with you; • to provide you the information you may have requested through a TCR Group website (f.ex. a request for offer of a service or product); • the use of cookies (for data processing via cookies, please see also TCR's cookies policy); • to carry out research and analysis.
Legal Grounds	TCR processes your Personal Data on the basis of your consent or legitimate interests.
Disclosure	<p>Access to your Personal Data will only be given on a strictly '<i>need to know basis</i>' and insofar an adequate level of protection of your Personal Data is ensured.</p> <p>(i) TCR Group Your Personal Data may be shared within the TCR Group. Some aspects of the Operations, Legal, Asset, Commercial, Communication & Marketing and ICT function are centralized at one or more entities of the TCR Group in order to allow TCR to better manage and administer its business. This centralization may result in the transfer of your Personal Data from one TCR Affiliate to another. Your Personal Data may also be stored in centralized databases.</p> <p>(ii) Third parties For some of the abovementioned purposes, we may transfer your Personal Data to third parties, but only on a strictly '<i>need to know basis</i>'. These third parties may include:</p> <ul style="list-style-type: none"> • third party service providers, such as service providers for IT technology and support, marketing agencies, credit rating

	<p>agencies, external advisors such as legal, accountancy, auditing, tax and other professional advisers;</p> <ul style="list-style-type: none"> • tax and other public authorities; and • any (potential) purchaser of the business. <p>To the extent that we outsource the Processing of Personal Data to a third party, we oblige this party to provide adequate protection of your Personal Data and prohibit any Processing for its own purposes.</p> <p>We may also transfer your Personal Data to other third parties when you have asked us to do so.</p>
<i>Retention</i>	<p>We will keep your Personal Data no longer than necessary for the purposes stated above. At the end of this period, we will ensure that your Personal Data are removed from our systems, except if such removal would be in violation of TCR's legal obligations to preserve certain records (legal retention periods under tax laws).</p>
<i>Amendments</i>	<p>We reserve the right to amend, revoke or complement this Annex from time to time. You will of course be informed of any changes.</p>
<i>Last update</i>	<p>This Annex has been updated on 29th January 2019.</p>