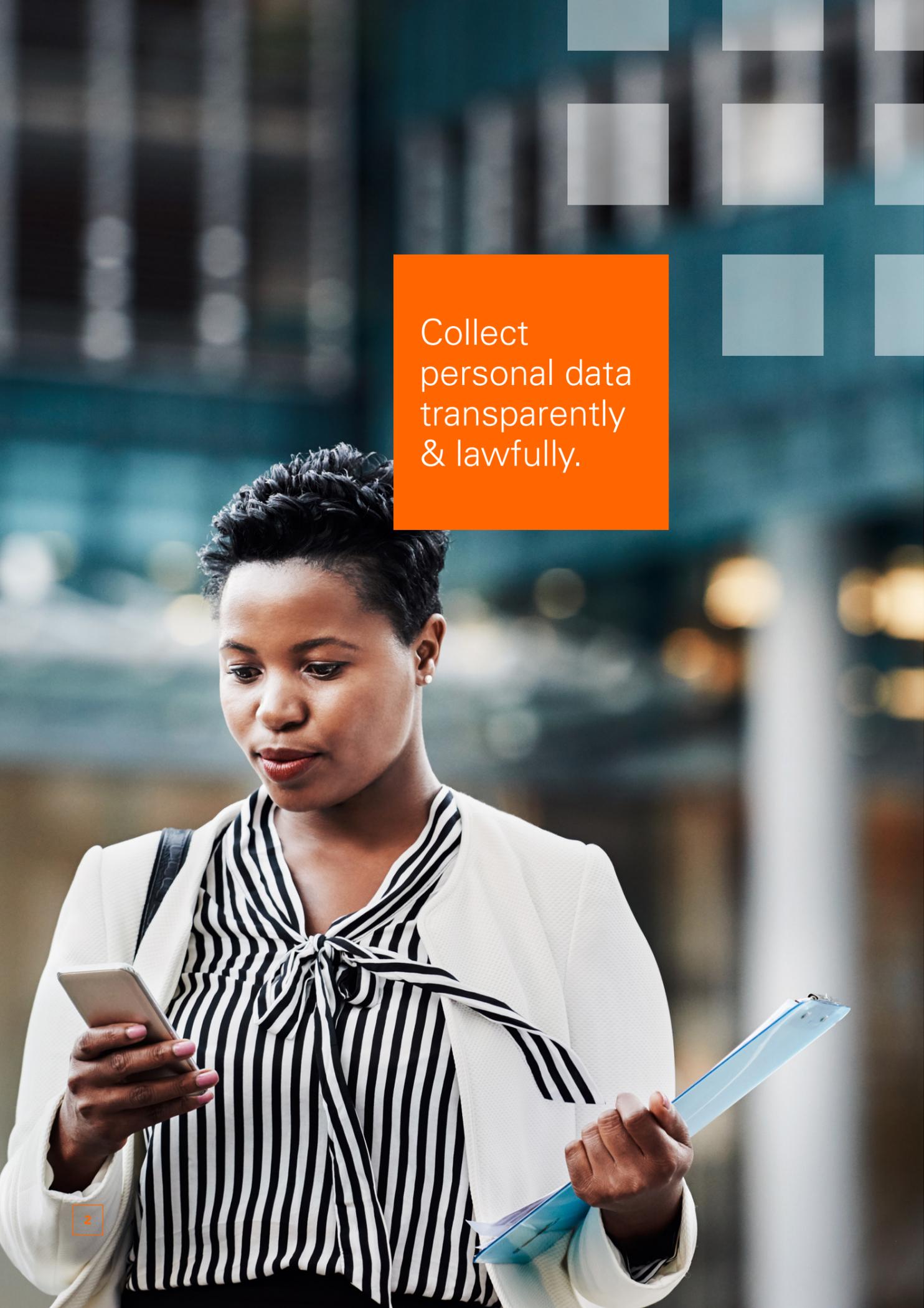




Data Privacy Policy



Collect
personal data
transparently
& lawfully.

Table of contents

4 A message from the Chief Executive Officer

5 Scope

6 SGS Data Privacy Policy

A message from the Chief Executive Officer

In the context of our business and to operate efficiently, SGS collects personal data from its customers, suppliers, employees, website users, job applicants, contractors, shareholders, partners and other third parties.

SGS recognizes 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 essential in maintaining trust and is embedded in our promise to our clients, as well as at the heart of our values, principles, conduct and success.

The introduction of stricter regulations and the digitalization of our services provide the opportunity to remind our clients and the industry of SGS's 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.



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, processing and managing the personal data of SGS's customers, suppliers, employees, candidates, contractors and other third parties.

This policy is founded on three core commitments:

- 1. Collect personal data transparently and lawfully**
- 2. Respect individual rights and choices**
- 3. Manage personal data responsibly and securely**

Personal data refers to any information which relates to an individual and may include amongst others: contact information (name, home and business address, phone number(s), 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 data (tax identification and bank account number).

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

Employee compliance with this policy is non-negotiable. Any violation of this policy will result in disciplinary action.

Internal implementation rules, guidelines and training are provided, as with all the necessary supporting documentation to ensure adherence to the SGS Data Privacy Policy.

SGS Data Privacy Policy

Three core commitments

Collect personal data transparently & lawfully

Be open about the personal data that is collected and used

We inform individuals about the use of their personal data.

When collecting personal data, SGS informs individuals clearly, honestly and transparently about the nature of the personal data it collects and what it intends to do with it, unless any laws or secrecy obligations which SGS is bound to, requires SGS to not inform such individuals about the collection and holding of their personal data.

Use personal data for lawful and specific purposes only

We collect and process personal data only if there is a lawful reason to do so.

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

We allow consent to be subsequently withdrawn.

Any consent by individuals to the collection and use of their personal data must be given freely and in response to 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.

In addition to this policy, SGS complies with the guidelines and instructions of the client or third party (a data controller) when processing personal data on their behalf.

Ensure data quality

We collect, store and ensure that personal data is not excessive, but proportionate, relevant, up-to-date and accurate for its intended purpose.

SGS collects and stores the minimum amount of personal data required for the intended initial purpose for which the data is to be used.

SGS ensures that personal data in its possession remains relevant and proportionate for its intended purpose.

SGS ensures that all data stored is up-to-date and accurate. Data is also corrected and modified as and when required.

We may use and engage in secondary usage or further processing of personal data only in the following circumstances.

SGS may use personal data for any secondary purpose or further processing, if the new purpose is compatible with the original purpose, or SGS obtains new consent or establishes a new legal basis for any new purpose.

We store personal data only for as long as it is really necessary.

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

Respect individual rights & choices

Respect the rights of the individual

We respond to all requests made by individuals in connection with their personal data.

SGS recognizes the rights of individuals to:

- (i) Request access to and receive a copy of their personal data processed by SGS
- (ii) Request the update or rectification of inaccurate or incomplete personal data
- (iii) Request the erasure of their personal data
- (iv) Object to or request restriction on the processing of their personal data
- (v) Request the portability of their personal data
- (vi) Withdraw consent given to SGS for the collection and processing of their personal data (without it affecting the lawfulness of any processing administered prior to the withdrawal)

SGS will honour such requests, withdrawal or objection as required under applicable data protection rules within a reasonable period of time. These rights are not always absolute: they do not always apply, and exemptions may be exercised. If SGS does not comply with the request, an explanation is provided.

Respect the choices of the individual

We inform individuals in clear and plain language when using their personal data for marketing purposes.

SGS respects the choice of its existing and prospective customers to:

- (i) Only receive marketing communication from SGS if explicit and specific prior consent has been provided,

- when required by applicable laws, or if SGS can demonstrate that it is authorized to send such communication for legitimate business purposes
- (ii) No longer receive any marketing communication if a specific preference setting, an opt-out or an objection to use such data for marketing purposes has been received by SGS

Safeguard the use of sensitive personal data

We use sensitive personal data only when it is absolutely necessary.

SGS recognizes the particular sensitivity of certain categories of personal data that require a higher level of protection. Sensitive personal data includes information regarding an individual's physical/ mental health or disability, biometric and genetic data, religious and political opinions, racial or ethnic origin, trade union and similar memberships, gender identity or expression, sexual orientation, criminal records and any other information protected specifically by the relevant applicable privacy laws.

SGS collects and processes sensitive personal data only when it is absolutely necessary and in either one of the following circumstances:

- (i) Explicit consent to use the sensitive data has been given by the individual
- (ii) The use of the sensitive personal data is necessary for SGS to comply with employment laws, other statutory obligations such as for the purposes of preventative or occupational medicine, for the assessment of the working capacity of an employee or to protect the vital interest of the specific individual (such as in a medical emergency) or any other circumstances permitted by applicable data privacy laws
- (iii) SGS implements appropriate procedures and safeguards to restrict access to sensitive data to only approved individuals, and prevent its unauthorized access, use and dissemination

Manage data responsibly & securely

Take appropriate security measures

We adhere to appropriate technical and organizational security measures to protect personal data.

SGS implements proper security measures to ensure the confidentiality, integrity and availability of personal data and to prevent the risk of unauthorized or unlawful access, alteration, destruction, or disclosure of such data. These protection measures are based on impact assessments that consider the risk to the specific individual whose personal data is to be stored by SGS into account. These measures include its security and organizational procedures that are adapted to the data processing type and the nature of the data to be protected.

We notify affected individuals and local authorities in the event of personal data breaches.

SGS promptly informs individuals of any privacy breach that has compromised their personal data and reports such incidents to the relevant authorities, when required by applicable laws.

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

SGS requires suppliers or sub-contractors to fully comply with SGS data privacy policy, applicable data protection and privacy laws, as well as maintain appropriate technical and organizational security measures to secure the protection of personal data.

We ensure that our employees maintain the confidentiality in personal data processing.

SGS restricts access to personal data to employees who are required to perform specific tasks in relation to such data.

Relevant awareness and confidentiality training is in place to ensure that personal data is not shared or disclosed to unauthorized persons, including SGS employees who do not require access to personal data.

Ensure adequate protection for international transfers

We take steps to ensure the protection of personal data before its 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 with the same level of protection required in the jurisdiction of origin as a minimum requirement.

Minimize risk impact to Individuals

We conduct a data protection impact assessment if the data processing is likely to present a high risk to individuals.

In order to eliminate or reduce risk, SGS conducts personal data impact assessments to identify the risks that personal data processing may cause to the privacy rights of individuals.

Personal data impact assessments are integral to the development of new services or business opportunities and acquisitions by SGS.

When you need to be sure

SGS Headquarters
1 Place des Alpes
P.O. Box 2152
1211 Geneva 1
Switzerland

sgs.com



SGS