

**Privacy policy for the processing of personal data of family members of Sofidel Benelux N.V. employees, pursuant to article 14 of EU Regulation 2016/679**

For Sofidel Benelux N.V. (hereinafter, "Sofidel"), the privacy and security of your personal data are of paramount importance. Therefore, we collect and process personal data with the utmost care and attention, implementing appropriate technical and organizational measures to ensure the security of processing.

This privacy policy aims to inform you about the purposes and methods of processing your personal data, as provided by your family member in the context of their employment relationship with Sofidel. This processing is conducted in compliance with Article 14 of the General Data Protection Regulation (EU) 2016/679 (hereinafter, "GDPR") and the Belgian Act of 30 July 2018 on the protection of natural persons with regard to the processing of personal data (hereinafter, "Belgian Data Protection Act").

**1. Data Controller and Data Protection Officer**

The processing of your personal data is performed by Sofidel Benelux N.V., as Data Controller, pursuant to the GDPR (hereinafter, also, "**Data Controller**").

For any questions or requests relating to the processing of your personal data you can contact us by sending a request to:

Company Name of the Data Controller	Sofidel Benelux N.V.
Registered Office Address	A. Stocletlaan 3, 2570 Duffel, Belgium
E-mail privacy	<a href="mailto:gdpr.benelux@sofidel.com">gdpr.benelux@sofidel.com</a>

**2. Categories of personal data**

The personal data processed by the Data Controller include:

- personal information (e.g. name, surname, date of birth, address, picture, sex, national registration number etc.);
- contact information (e.g. landlines and/or mobile phone number, e-mail address, etc.);
- disability status and any documentation that substantiates their disability status;
- Financial information (bank details) of spouse and heirs.

*(The personal data indicated above will be defined below jointly, for brevity, as "**personal data**".)*

**3. Purpose and legal basis for processing personal data**

Your personal data shall be collected and processed for the following purposes:

- a. **proper management of the employment relationship established with your family member, in compliance with applicable regulations** (e.g. to allow the use of statutory

benefits payable through the employer, payment of family allowances); to allow the management of parental leave, marriage leave, adoption/ foster care leave, family care leave; to allow tax deductions for dependent family members; to allow the management of compulsory maternity leave; to allow the management of leave for the care of disabled family members and the management of paid leave, on the basis of art. 6 sub. 1, letter c) of the GDPR (legal obligation). (“**data management purposes of the employee's family members**”).

- b. **emergency contact** (in case there is a need to contact you with reference to your family member employed at Sofidel, on the basis of art. 6 sub. 1, lett. d) of the GDPR (vital interest) (“**emergency contact purposes**”);
- c. To fulfil any **defense purposes** as well as to ascertain or exercise the Controller's rights in out-of-court, in court or administrative proceedings, on the basis of arts. 6, sub. 1, lett. f) and 9, sub. 2, lett. f) of the GDPR (“**defence purposes in court**”).

#### 4. Disclosure of Personal Data

Your personal data is processed by Sofidel personnel specifically authorised and trained for this purpose, pursuant to art. 4 paragraph 10 of the GDPR and to art. 26 (10) of the Belgian Act of 30 July 2018. This personnel process data only under the documented instructions of Sofidel as Data Controller.

Your data may be managed by the HR staff of Sofidel S.p.a. (holding company of the Sofidel Group) but only on a need-to-know basis. Sofidel may also disclose your personal data to third-party processors. In such cases, Sofidel will ensure that these processors:

- Provide sufficient guarantees to implement appropriate technical and organizational measures to meet the requirements of the GDPR.
- Are formally appointed as processors under Article 28 of the GDPR.
- Process personal data only on documented instructions from Sofidel and under Sofidel's control.

A specific and up-to-date list of these processors can be obtained from the Data Controller by contacting the Data Controller at the following address: [gdpr.benelux@sofidel.com](mailto:gdpr.benelux@sofidel.com)

Your personal data may also be disclosed to other controllers, such as public authorities or other bodies, when such disclosure is required by law or a regulatory obligation.

#### 5. Transfer of data outside the EU

Your data will not be transferred outside the European Union.

Notwithstanding the foregoing, in exceptional circumstances, if any of the third parties mentioned in section 4, are located in countries outside the European Union, the transfer of your personal data to such entities will be carried out exclusively based on:

- adequacy decisions issued by the European Commission;
- Prior execution of specific agreements between Sofidel and the aforementioned processors, incorporating safeguard clauses and appropriate guarantees for the protection of your

personal data (so-called “Standard Contractual Clauses”, as made available by the European Commission);

- If neither of the above conditions are met, we will seek your explicit consent before any transfer, after providing you with information about the data protection standards in the destination country.

## **6. Storage of personal data**

Your personal data will be stored only for the time necessary for the purposes for which they are collected, in compliance with the principles of minimisation and limitation of storage referred to in article 5, (1) c) and e) of the GDPR

Specifically, your data will be retained:

- with reference to the purposes of section 4 a) and 4 b), your data will be kept for a period of 5 from the termination of the employment relationship.
- with reference to the purposes of subsection 4 c), your data will be retained until the completion of all legal proceedings, including any appeals.

At the end of such periods, your data will be irreversibly deleted or anonymised.

However, the Data Controller may keep your data for longer periods to meet legal requirements or for necessary legal defence purposes.

## **7. Your rights**

Pursuant to and for the effects of the GDPR, you have the right to:

- Access (art. 15): you have the right to request confirmation if your data is being processed, and to have a copy of the same;
- Rectification (article 16): you have the right to request the correction of inaccurate data and the completion of incomplete data;
- Erasure (Art. 17): In certain circumstances, you may request the erasure of your personal data;
- Restriction (Art. 18): you have the right to request the restriction of the processing of your personal data in cases such as the unlawful processing of your data or if the data you have provided is not accurate;
- Portability (Art. 20): you have the right to request your personal data in digital and readable form and/or to have it transferred to another controller;
- Object (Art. 21): You may object to the processing of your personal data for direct marketing purposes without providing a reason. In other cases, you may object based on specific circumstances, which must be detailed in your request;
- Lodge a complaint (Art. 77): you have the right to lodge a complaint with the Belgian Data Protection Authority if you believe your rights have been infringed  
GBA / APD

Drukpersstraat 35

1000 Brussels

Tel: +32 (0)2 274 48 00

- [contact@apd-gba.be](mailto:contact@apd-gba.be) or taking legal action (art. 79)

## **8. Protection of personal data**

We have implemented appropriate technical and organizational security measures to ensure the security of your personal data. More information are available here: [Cloud Services Documents | SAP Trust Center](#).

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