

# RewAir Group Privacy Policy

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## Introduction

The RewAir Group Privacy Policy outlines the personal information we collect and how we use personal information in connection with our business activities. We have, via best possible efforts, certified our Privacy Policy as being consistent with Regulation (EU) 2016/679 of the European Parliament and of the European Council of 27 April 2016 on the protection of natural persons about the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, in short “GDPR”).

## Scope / Applicability

The term “Personal Information” is used for information that can identify and that relates to an individual. “Personal Data” has the same meaning as “Personal Information”.

This Privacy Policy applies to RewAir’s undertakings in connection with our business activities regarding the privacy of individuals Personal Information collected, transferred and processes i) within and between RewAir Group companies, ii) between RewAir Group companies and 3<sup>rd</sup> parties within the European Union and iii) between RewAir Group companies and 3<sup>rd</sup> parties outside the European Union.

## About whom do we collect and process Personal Information?

We collect and process Personal Information about job applicants, our employees, and retired employees.

Further, we collect and process Personal Information about customers, suppliers, and other business partners. For customers, suppliers, and other business partners we do not collect sensitive or special category Personal Information.

We collect Personal Information in several ways:

- **Personal information provided to us by the individual person:**  
This may consist of information voluntarily provided to us by individuals when they express an interest in our company, products, services, or enter contracts or other business relations with us.
- **Personal information obtained from third parties:**  
We may also obtain Personal Information from third parties such as our HR business partners and other business affiliates.

We only collect Personal Information when needed for a given business purpose.

## Why do we collect and process Personal Information?

To:

- Assess job applicants,
- Employ, manage, and develop our employees,
- Perform contracts with and fulfill orders for products and services from customers,
- Facilitate our business relationships with our business partners and suppliers,
- Communicate information about our company, products, and services,
- Provide, maintain, and upgrade our systems, network, and processes, and
- Comply with laws and regulations applicable to our business.

We do not use Personal Information for a purpose that is materially different than or incompatible with the purpose for which it was originally collected or subsequently authorized by the individual.

Additionally, we will not (i) disclose, or (ii) use for a purpose other than those for which it was originally collected or subsequently authorized by you, any Personal Information that reveals details about your health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, or sexual orientation, unless you have given us express permission to do so or unless permitted by law.

We do not use consent requiring cookies on [www.rewair.com](http://www.rewair.com).

## Onward Transfers

We may transfer Personal Information to third parties acting as data controllers, such as other RewAir Group companies, or data processors, who may also be other RewAir Group companies or third parties who assist with (i) the administration of business programs and services, (ii) compliance with our obligations to regulators, and/or (iii) maintenance of our systems, networks, and processes.

Before an eventual transfer of Personal Information to other RewAir Group company as controller and/or processor, we will enter a GDPR compliant Global Intercompany Data Processing and Transfer Agreement between the RewAir Group companies in question.

In case we transfer Personal Information to a third-party processor within the European Union, we will enter a GDPR compliant Data Processor Agreement with the third-party processor.

Eventual transfer of data between i) RewAir Group companies and ii) between RewAir Group companies and third-party parties, and in case one of the parties is in a country outside the European Union, will be based the transfer on the EU Commissions Standard Contractual Clause.

Please be aware that we may be required to disclose Personal Information in response to lawful requests by public authorities to comply with national security or law enforcement requirements.

#### **Specific on mail transfer:**

Mail communication is encrypted during transfer/transport by use of a GDPR compliant encryption measures.

We limit emailing of sensitive and special category Personal Information to the extent possible and for a defined business purpose only.

### **Access**

Only the Group Data Controller, Executive Management and Group ERP & Business Support have access to all Personal Information.

Site Management (RewAir Subsidiary Management) have access to Personal Information related to the site employees and relevant business activity. Managers have access to Personal Information related to their employees and relevant business activity within their span of control.

You have a right to access Personal Information we collect and process about you by emailing us at the email address listed in the Contact section of this Privacy Policy.

Additionally, you may request that we correct, amend, or delete Personal Information that is inaccurate or improperly processed. Before making any change to Personal Information, for security purposes and to protect Personal Information from unauthorized access, we may ask for information enough to verify the authenticity of an access request. We may limit or deny such requests if it would be unduly burdensome or expensive or were doing so might adversely affect another person's privacy rights, compromise confidential commercial information, interfere with the execution or enforcement of the law or with private causes of action, or breach a legal or other professional privilege or obligation.

We may charge a reasonable fee for access to Personal Information where, for example, the request for access is manifestly excessive or repetitive. Additionally, we may set reasonable limitations on the number of times within a given period that access requests from an individual will be met.

Our aim is to meet your legitimate request for insight in your Personal Data within 4 weeks from reception of your request.

Further, if you have any complaints about RewAir's processing of your Personal Information, you may contact the relevant national Data Protection authority.

Personal Information traffic, including connects, on social medias between employees and RewAir internal and/or external parties is not within the area of responsibility of RewAir and thus, no consent is required.

### **Security**

We will take reasonable technical and organizational measures to protect Personal Information from loss, misuse, unauthorized access, disclosure, alteration, or destruction.

The RewAir IT infrastructure and software suite supports a reasonable level of protection of Personal Information given the type of business and the size of the RewAir Group.

### **Specific on the use of video:**

RewAir makes use of 24/7 video surveillance for security purposes at selected sites and both out-side and in-site our facilities. Signposts inform about the use of video. Video recordings are kept for maximum 30 days following which they are deleted. Site Management ensures that only authorized personnel have access to view the video recordings.

### **Specific on storage and deletion:**

Personal Information in hard copy is stored in lockers with authorized access only. Personal information in digital form is protected via access codes and other forms of restricted access control.

Hard copies are destroyed via maculation or via controlled handling by authorized companies. Digital information is destroyed via deletion by the data controller and from relevant medias.

## **Data Responsibility and GDPR Organization**

Given the nature of business and the extent of Personal Information collected and processed, RewAir has not appointed a Data Protection Officer (DPO).

The RewAir Group Data Controller is appointed by Executive Management. The Group Data Controller is responsible for the RewAir GDPR definitions and the compliance, support, and control mechanism and for related GDPR responsibility delegation to the RewAir Group companies.

Site Management is empowered as local data controller to handle the localization and management of GDPR compliance within the respective subsidiaries.

GDPR compliance, tools and documentation efforts are supported by the GDPR Compliance Support Manager appointed by the Group Data Controller.

Follow-up upon GDPR compliance within the RewAir Group companies follows the RewAir Group audit plan for the Quality Management System.

In case of data breach, we follow our GDPR compliant RewAir Group Data Breach Contingency Plan (an appendix to the prevailing RewAir IT Security Policy).

## **Purpose Limitation and Retaining**

Personal Information will be limited and relevant for the purposes for which it is to be processed. Personal Information will not be processed in a way that is incompatible with or materially different from the purposes for which it has been collected or subsequently authorized by the individual. Reasonable steps will be taken to ensure that Personal Information is reliable for its intended use, accurate, complete, and current.

Further, Personal Information will be retained only for as long as it serves the purposes for which it was collected or subsequently authorized by the individual. Specifically:

- Official criminal records or statements, if so, requested e.g., in connection with an employment process, will be deleted/maculated without undue delay after use,
- Personal Information records on job applicants will, without undue delay, be deleted/maculated following a successful trial period of the candidate allocated the job. In case a consent is granted by a given applicant, an extended retaining period may materialize,

- Personal Information records on employees will without undue delay be deleted/maculated after termination of the employment unless specific factors justify a longer retaining period, e.g., a running or threatening legal dispute. In case a consent is granted by a given employee, an extended retaining period may materialize, and
- Without undue delay after termination of an employee holding an e-mail account, the e-mails must be redirected to an entrusted party with proper guidance from the data responsible on which e-mails to process. Mail folders named "Private" must be deleted without undue delay.

## Contact

Questions and complaints about our privacy practices can be submitted to us by emailing [policy@rewair.com](mailto:policy@rewair.com). We will respond to your inquiry or complaint without undue delay.

## Changes to this Privacy Policy

This Privacy Policy is effective November 7<sup>th</sup>, 2022 and may be amended from time to time in compliance with the requirements of the GDPR Principles. If we do so, we will post an updated version on our website ([www.rewair.com](http://www.rewair.com) ).

To the extent there is any conflict between the GDPR privacy principles and this Privacy Policy, the GDPR privacy principles shall take precedence.