

Syensqo's Privacy and Information Notice for Service Providers and Suppliers

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1. What is the purpose of this Privacy and Information Notice?

Syensqo SA ("Syensqo"), Data Controller of your personal data, recognizes and supports the privacy interest of all persons with whom it has business interactions and respects these interests when it collects and processes personal data. Syensqo is committed to being transparent about how it processes personal data and the steps it takes to protect the rights and privacy of individuals.

The information contained in this Privacy and Information Notice applies to Service Providers and Suppliers ("you", "your") in respect of any processing of personal data undertaken by Syensqo for the purposes of meeting its obligations, including those under applicable Export Compliance Laws.

Syensqo complies with the applicable national laws that protect personal data, including the EU General Data Protection Regulation 2016/679, applicable from May 25, 2018, and all laws and regulations (all defined as "Data Protection Legislation") in the jurisdictions in which it conducts its business.

Please note, Export Compliance Laws shall mean: all laws, regulations, statutory instruments, conventions and treaties relating to import or export restrictions, financial or trade sanctions, trade embargoes and anti-boycott measures imposed by the United Nations Security Council, the European Union, a European Union member state, the United Kingdom, the United States of America or any other jurisdiction that is relevant to the performance of this Agreement, including any government authority, body or agency thereof. Such measures shall include, without limitation, controls relating to the export or import of military or dual-use items and technologies, chemical precursors (drugs and explosives), dangerous chemicals, pesticides and substances that deplete the ozone layer.

For more details on how Syensqo protects your personal data, please refer to the [Syensqo Data Protection Policy](#).

2. What is “personal data”?

Under the Data Protection Legislation, personal data is defined as any information related to an identified or identifiable natural person. An identifiable natural person is someone who can be directly or indirectly identified, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or one or more factors specific to the physical, physiological, genetic, psychological, economic, cultural, or social identity of that natural person.

Personal data encompasses a wide range of information that can be linked to an individual, either directly or indirectly, and includes not only obvious identifiers like names and addresses but also other details that, when combined, can lead to the identification of a person.

3. What personal data will be processed?

Syensqo may process the following personal data about you:

- a) First name, last name, email address, phone number, address along with the name of your employing company and its country of incorporation;
- b) Nationality or nationalities supported by copy of a valid passport or equivalent form of identification;
- c) Country of residence or Country from where you will be performing services to Syensqo on behalf of your employer;
- d) If you are a foreign national resident of the US, a copy of your permanent residency status card (Green Card) including its expiration date.

4. For what purposes and on what legal basis are your personal data processed?

Under the Data Protection Legislation, personal data may be processed for specific purposes where there is a legal basis (i.e. a reason prescribed by law) to do so according to the transparency, accuracy, necessity, minimization, need-to-know, and security principles. The main legal basis Syensqo relies on are:

- Need to fulfill contractual and/or pre-contractual obligations;
- Need to comply with legal obligations;
- Need to fulfill its legitimate interests.

The table below sets out the purposes for which Syensqo may process your personal data and the corresponding legal basis for such processing:

Purpose of processing	Legal basis
To finalize contracts, execute contracts and related obligations, including those that may occur even after the termination of those contracts.	Fulfill contractual and/or pre-contractual obligations
To assess the conditions preliminary to the conclusion of a contract or to manage all stages preliminary to the conclusion of a contract.	
To comply with requirements imposed by regulations or local authorities where the data controller is established or operates.	Comply with legal obligations
To obtain export licenses from the competent national authority.	
To effectively respond to inquiries and audits conducted by national authorities or other competent auditors (such as the US Department of Commerce and/or the US Department of Defense) responsible for export controls of goods and technologies.	

To manage internal investigations aimed at protecting Syensqo's assets, reputation as well as ascertaining the existence of a right that Syensqo could protect in and/or out of court.	Legitimate interests
To manage access to Syensqo physical premises and databases containing Syensqo controlled items and technologies.	
To ensure Syensqo network and information security.	
To communicate to other companies of the Syensqo Group for internal administrative purposes.	
To protect (by ascertaining, exercising or defending) a right of Syensqo or a third party.	

Concerning the processing carried out on the legitimate interest legal basis, Syensqo carried out a prior legitimate interest assessment of the impact of the above activities on your fundamental rights and freedoms such that it considered its own legitimate interest to prevail. If you would like more information about the rationale behind our assessments, you may contact us using the contact details set out below.

5. With whom may your personal data be shared?

In order to achieve the above purposes, Syensqo may share your personal data with:

- a) Persons within the Syensqo Group, such as members of the Security team, IT staff, the Compliance team and/or administrators where necessary for the purposes detailed in the section above. This sharing is on a strictly authorized basis only, and any processing by such persons is limited to the scope of their business functions;
- b) Strictly authorized third parties acting within the scope of their functions such as IT service providers, external auditors, consultants, advisors, and government agencies as necessary for the purposes detailed in the section above. Any such processing by third parties is governed by (and is limited to) the specific contractual terms in place between Syensqo and the relevant third party;
- c) Regulatory bodies or law enforcement agencies, where necessary for any investigations or to respond to enquiries in relation to Syensqo's compliance with applicable laws, in connection with criminal investigations, or where otherwise permitted or required by applicable law;
- d) Enforcement bodies or courts, such as judicial courts, arbitrators, and mediators.

6. May your personal data be transferred to other Countries?

Syensqo utilizes third party data centers to host your personal data, which are located both within and outside the European Union ("EU"). Your personal data may therefore be transferred to, stored and/or processed in, one or more Countries outside of EU, including Countries that do not provide equivalent levels of protection for personal data. In these circumstances, Syensqo will take reasonable steps and implement appropriate measures to ensure that your personal data is adequately protected in accordance with applicable Data Protection Legislation.

Syensqo is committed to ensuring that any third party with whom it shares personal data takes all necessary measures to ensure confidentiality, integrity and availability, as well as to comply with the transfer mechanisms specified by applicable Data Protection Legislation.

Please contact Syensqo using the contact details set out below if you want further information on the specific measures used when Syensqo transfers your personal data outside of the country in which it is established.

7. How the protection of your personal data is ensured?

Syensqo employs internal policies and controls, and makes commercially reasonable efforts to safeguard your personal data against loss, accidental destruction, misuse, or unauthorized disclosure, including via the implementation of access controls and other administrative, technical and physical measures to protect the confidentiality, integrity, availability, and security of your personal data.

When Syensqo enlists the services of third parties for processing personal data, it is done based on written instructions, and such third parties are also held to a duty of confidentiality and are required to implement appropriate technical and organizational measures to ensure the security of the data.

8. How long your personal data will be processed and retained?

Your personal data is processed and retained for as long as it is necessary to fulfill the above purposes and for the duration of your mission with Syensqo. If applicable, it will also be stored for as long as required to comply with the relevant regulations, such as the Export Compliance Laws and Regulations for auditing purposes, whichever duration is longer.

According to the Data Protection Legislation, Syensqo will delete or anonymize your personal data once the applicable retention period has been reached and as long as the personal data is no longer needed.

Syensqo has adopted and maintain updated over times a Record Retention Policy in order to ensure that personal data is retained only as soon as necessary. If you would like more information about the retention rules and rationales adopted by Syensqo, you may contact us using the contact details set out below.

9. What are your rights with respect to your personal data?

According to the Data Protection Legislation, as a Data Subject you have various rights with respect to your personal data. In particular, you have the right to:

- a) Access to your personal data upon request;
- b) Request the rectification of your personal data, including the supplementation of incomplete information;
- c) Request the erasure or cessation of processing of your personal data, particularly when the data is no longer necessary for the intended processing purposes;
- d) Object to the processing of your personal data;
- e) Request the restriction of the processing of your personal data in accordance with applicable Data Protection Legislation;
- f) Obtain a copy of your personal data in a structured, commonly used and machine-readable format and have the right to transmit those data to another data controller.

If you wish to exercise any of the above rights, or if you have a complaint about the way in which Syensqo has processed your personal data (including if you believe that Syensqo has breached any applicable data protection laws) you can send an email to sco-privacy@syensqo.com. Your requests will be managed as soon as possible and anyway no later than thirty days. Only when strictly needed and according to what started by the applicable laws, your requests might be managed by ninety days upon written notice to you.

If you are dissatisfied with the proposed resolution of your complaint, you also have the right to make a complaint to the relevant Supervisory Data Protection Authority that regulates the processing of your personal data. For more information about the data protection supervisory authorities in Europe, please visit the European Data Protection Board website here: https://www.edpb.europa.eu/about-edpb/about-edpb/members_en.

10. How can I ask questions and feedback?

If you have any questions, remarks, or suggestions about this Privacy and Information Notice, please contact Syensqo's Data Protection & Privacy Office sending an email at sco-privacy@syensqo.com.