

Data Privacy Statement for Clariant Integrity Line

In the following Data Privacy notice we would like to inform you about the processing of your personal data and / or the personal data of a subject you may report on in our Integrity Line system which is administrated by the Clariant Group (Clariant International Ltd, and all its affiliated Companies) ("Clariant").

The integrity Line is an external platform which is operated by our Provider Formalize. For more information related to Formalize, see <https://whistleblowersoftware.com/en/personal-data-policy>. Regarding the use of Clariant Integrity Line website and the online collection of personal data please refer to our data protection declaration at Group Privacy Policy or Data protection and Privacy @ Clariant.com

1. Processing of your personal data by Clariant Group Companies

The Clariant company that you are employed by is responsible for processing your personal data in the context of applicable data protection laws.

The Group Data Protection Office is available to answer any questions you may have about data protection at Clariant and can be reached at: dataprotectionoffice@clariant.com.

2. The type of data processed by Clariant in the Integrity Line

We process personal data of natural persons, as far as it is necessary to fulfil our obligations as required by law or our set out in our internal Compliance Framework and according to our Investigation Process. We may therefore collect, store, delete or transfer personal data.

The categories of personal data we process may include, but are not limited to:

- If the reporter chooses to provide his contact details, we may process those and in addition business address, name, telephone number, e-mail address, function and department
- Personal Data of a natural person that we need for investigations
- Identification data, e.g. name, passport / ID card number, gender, pictures (badges)
- Information on activities, tasks, position etc. to investigate the allegations reported

3. Purposes of processing by Clariant and legal bases

At Clariant, everyone should feel comfortable to speak up and ask questions, report concerns or observed misconduct. We have a legitimate interest in processing personal information that

you provide voluntarily in such a context. The personal data that you give us will be used solely for investigating the allegations you reported. We encourage you to report violations of the Clariant Code of Conduct or any other breaches of law or policies directly to your line manager, local or Global HR, local or Group Legal or Group Compliance. The Integrity Line, a global whistleblowing system covering all Clariant Group entities, does not replace but complements these existing reporting channels and allows you to remain anonymous.

Clariant has committed to process data only for these purposes. Clariant will inform about changes of purpose if data was processed for any purpose other than originally stated when the data was collected. We process personal data only for permitted purposes and in compliance with the legal provisions of the European Data Protection Regulation (GDPR) and applicable local laws on global level.

3.1. We process data to fulfil our contractual obligations

We process personal data to comply with our Code of Conduct, values, legal and contractual obligations towards our employees, customers, suppliers and business partners.

3.2. We process data to comply with our Code of Conduct

We must process certain data to meet our Code of Conduct commitment and /or legal obligations. In detail, this may also result in retention, storage, reporting and data collection obligations for our company, which as a rule serve control purposes of the relevant public authorities. In addition, the disclosure of personal data may become necessary in a legal proceeding or prosecution.

3.3. We process data to uphold legitimate interests (taking your interests into account)

We also process personal data if necessary to uphold the legitimate interests of the companies of the Clariant Group or our employees, customers, suppliers or business partners (and, where applicable, other third parties). This includes e.g.:

- to report and investigate suspected compliance cases
- to prevent and investigate criminal offences and
- to assert and defend against legal claims.

3.4. We process data with your consent

You provide your personal data voluntarily to us. You may provide us with your full name, home or business address, email address and/or phone number. This information, although not mandatory, would allow us to maintain a direct communication. If you choose to remain anonymous you will be provided with a reference and will be asked to create an account with login details. Clariant will then only be able to communicate with you through the Integrity Line platform and you understand that Clariant has no personal data from you.

By giving us your personal data, you are consenting to us processing it for the purposes stated in this Privacy Notice.

You may withdraw your consent at any time. Please note that data processing up to the withdrawal remains permissible.

3.5. Information of the individual(s) mentioned in the report

The individual(s) mentioned in the allegation must be informed by the person in charge of the investigation as soon as data concerning him/her is substantiated in the investigation process, so that this individual can object to the processing of his/her personal data. For further information on your privacy during an investigation you can contact our Group Privacy Head at dataprotectionoffice@clariant.com.

When safeguard measures are necessary, to avoid the destruction of proof in relation to the allegation, the individual(s) will be informed after these measures have been taken.

This information, carried out in conditions which ensure proper delivery of the information to the person in question, mentions, in particular:

- the entity in charge of the process,
- the alleged facts,
- the recipient(s) of the report,
- as well as the way the individual can exercise his rights to access and modify the personal data.

3.6. Information about changes of purpose

If we process your personal data for any purpose other than that for which you originally provided it, we will inform you of this in accordance with the applicable legal provisions.

3.7. Processing principles

Appropriate technical and organizational measures for data security are implemented by internal regulations and - as the data is processed by an external service provider based on a contract – by corresponding contractual agreements. (For more information on the technical and organizational measures of our external provider see <https://whistleblowersoftware.com/en/personal-data-policy>).

In some cases, we also process personal data that we have received from publicly available sources, e.g. telephone directories, trade and company registers, Internet sources, newspapers, trade directories, etc., in accordance with the applicable data protection laws.

4. Recipients of your data

Personal data is transferred to other companies in the Clariant Group if and to the extent necessary to safeguard our statutory obligations or our legitimate interests. This may be the case, for example, for conducting an investigation involving other Clariant Group Companies. If

we involve external service providers, this is done in compliance with the applicable data protection regulations.

In accordance with the statutory provisions, the data required for the respective purpose may be passed on to other internal and external bodies in the following cases:

- Authorised Clariant representatives responsible for investigating reports (whose involvement depends of the nature or extent of the reported facts and this on a strict need-to-know basis)
- Individuals accessing the personal data are specifically trained and subject to a reinforced confidentiality obligation contractually provided for
- to other Clariant Group companies and to internal and external service providers for operational purposes
- to authorities, courts and other government agencies for the purposes of fulfilling reporting and information obligations
- to attorneys, external investigators, courts and other public institutions for clarification and assertion of claims or defence against asserted claims.

We only disclose personal data to other recipients outside the Clariant Group if we are legally obliged to do so, we have a legitimate interest to investigate the allegations or if you have given us your explicit consent.

5. Transfer to other countries

We transfer your data to recipients in countries outside the European Economic Area (EEA) where the EU Commission has not established an adequate level of data protection (third countries), if this is necessary to meet contractual obligations or other existing legal obligations.

We also transfer your data to companies in the Clariant Group outside the EEA based on an agreement between the companies in the Clariant Group (Clariant Intragroup Data Processing and Transfer Agreement), which applies the EU standard contractual clauses. These can be viewed on request by contacting our data protection officer at:

dataprotectionoffice@clariant.com.

6. Storage and retention periods

The personal data will be stored as long as necessary to process and investigate the report, or, if applicable, as long as necessary to initiate sanctions or to meet any legal or financial requirement. In any case, if judicial or disciplinary proceedings are initiated, the personal data provided will be kept until those proceedings are definitively closed; if not, they will be kept no longer than 1 Year from the date on which investigations end.

7. Obligation to provide data

Clariant encourages you to disclose your identity and to share a phone number or email address that someone from Clariant Group Compliance or the designated function in charge of the investigation can contact you directly and discuss the case further if needed. If allowed by law and you choose to report on the Integrity Line Platform anonymously, your report cannot be traced back to you.

In any case the information you provide is the basis for a trustful and lawful investigation.

8. Automated decision making and profiling

Automated decision making and profiling as defined in Art. 4 No. 4 GDPR does not take place.

9. Your rights

In the context of the processing of personal data, you have the following rights pursuant to Articles 15 to 21 of the European Data Protection Regulation:

- Right to information,
- Right to correction,
- Right of deletion,
- Right to restrict processing and
- Right to data portability.

In addition, you have the right to object to the processing of your data to safeguard the legitimate interests either of Clariant or a third party. In this case, we will no longer process your personal data unless we can give overriding legitimate reasons for the processing, which outweigh your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

You can address your objection to us electronically by contacting the Group Compliance Office at complianceofficer@clariant.com.

You also have the right to withdraw your consent to the processing of your personal data at any time with immediate effect. Such withdrawal has no effect on the past, i.e. it does not affect the effectiveness of data processing until the withdrawal.

If you consider that Clariant's processing of personal data is not in compliance with data protection regulations or should you not be satisfied with our information, you have the right to complain to the supervising authority responsible for you or us under the European General Data Protection Regulation (GDPR).