

# PFNONWOVENS APPLICANTS PRIVACY POLICY

## 1. WHAT IS THE PURPOSE OF THIS DOCUMENT?

- 1.1 Each company of the PFNonwovens group of companies; including in particular PFNonwovens US Inc. and PFNonwovens LLC with the registered office in the USA, PFNonwovens Holding s.r.o, PFNonwovens a.s., PFN International Services s.r.o., PFNonwovens Czech s.r.o., PFN NW a.s., PFN NS a.s. and PFN GIC a.s. with the registered office in the Czech Republic, PFNonwovens Egypt LLC with the registered office in Egypt and PFNonwovens RSA (PTY) LTD with the registered office in the Republic of South Africa (the "PFN Group") is committed to protecting the privacy and security of your Personal Data.
- 1.2 PFN Group companies with the registered offices in the Czech Republic are joint controllers of personal data and agreed that PFNonwovens Holding s.r.o., with its registered office Hradčanské náměstí 67/8, Hradčany, 118 00 Prague 1, ID No.: 04607341, will act in respect of the data subjects as the central point of contact and will fulfil the duties arising from the applicable legal regulations, in particular, the GDPR, for the benefit of data subjects.
- 1.3 **"Personal Data"** can have a broad interpretation and means any information relating to an individual who may be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- 1.4 This privacy policy describes how we collect and use your Personal Data prior to your working relationship with us, in accordance with the applicable data protection laws across the jurisdictions in which PFN operates, including the European General Data Protection Regulation ("**GDPR**"). It applies to applicants to job offers proposed by PFN. We may update this notice at any time in accordance with the procedure described below.
- 1.5 For the purposes stated herein and in relation with your applications to job offers proposed by PFN Group, PFNonwovens LLC with the registered office in the USA, PFNonwovens Holding s.r.o. with the registered office in the Czech Republic, PFNonwovens Egypt LLC with the registered office in Egypt and PFNonwovens RSA (PTY) LTD with the registered office in the Republic of South Africa is the "*data controller*" of your Personal Data and is referred to in this policy as "**we**" or "**us**". This means that we are responsible for deciding why and how we hold and use Personal Data about you.
- 1.6 It is important that you read this applicants privacy policy, together with any other privacy notice we may provide on specific occasions when we are collecting or processing Personal Data about you, so that you are aware of how and why we are using such information. It is also important that you review any privacy notice we may circulate to you, detailing how to handle personal data, whenever you are in a position requiring you to access and use such data.

## 2. WHAT PERSONAL DATA DO WE HOLD ABOUT YOU?

2.1 We process such address, identification and descriptive personal data that you provide us with. We may process mainly the following Personal Data about you.

## a. Contact information

- o Personal contact details such as name and surname, title, addresses (e. g. permanent residence, delivery address), telephone numbers, and email addresses
- b. Status information
  - o Date of birth, Age
  - o Gender
  - o Photographs, if on your CV
  - o Residence permit card
  - o Signature



# c. Employment history and management information

- o Education information and background
- o Qualification and certification
- o Job title
- o Current and previous employers
- o Language skills
- o Professional experience, competencies, expertise and skills
- o [Start date.]
- o Location of workplace
- o Compensation history
- 2.2 Where applicable law requires or allows us to do so, and, as the case may be, subject to your prior explicit consent, we may also process the following *"special categories"* of more sensitive Personal Data:
  - Racial or ethnic origin, sexual orientation [US, Egypt, RSA only]
  - Information about your health, including any medical condition, disability, health and sickness records, records of blood donations

# 3. HOW IS YOUR PERSONAL DATA COLLECTED?

- 3.1 We may collect your Personal Data using various ways, including Personal Data:
  - Disclosed directly by you, whether in writing or orally (e.g. via CVs, employment records, applications, certificates, confirmations, statements, cards, questionnaires, contracts, HR and other documentation, etc.);
  - Generated by us in conversations, interviews, correspondence, appraisals, etc. with you;
  - Received by third parties so that such third parties may administer the employment application processes and other legal purposes on our behalf;
  - Accessible from publicly available information (e. g. public registers).

## 4. INFORMATION ABOUT THIRD PARTIES

- 4.1 In the course of your dealings with us you may provide us with Personal Data relating to third parties, including but not limited to details of your employment references.
- 4.2 We will use this Personal Data in accordance with this applicants privacy policy. If you are providing us with Personal Data relating to a third party, you warrant that you have informed the third party of the rights herein and of the information provided in this applicants privacy policy.
- 5. WHAT IF YOU DO NOT PROVIDE YOUR PERSONAL DATA?
- Certain Personal Data, such as contact details, your right to work in your place of employment and payment details must be provided to enable us to enter an agreement with you. If you do not provide other certain Personal Data, this will hinder our ability to administer the rights and obligations arising as a result of the employment relationship efficiently.

## 6. How do we use THE PERSONAL DATA WE COLLECT ABOUT YOU?

6.1 We need all the categories of Personal Data stated in the list above to employ you and to enable us to comply with legal obligations. In some cases, we may use your Personal Data to pursue legitimate interests of our own or those of third parties (e. g. execution of precontractual measures, performance of contract obligations, ensuring that promotions or decisions about work allocation are taken on merit and in ensuring that future employees have the skills and qualifications to deliver their roles and make our business success), provided your interests and fundamental rights do not override those interests. The situations in which we process your Personal Data are listed below. In the limited circumstances we may also collect, process, and transfer your Personal Data for specific purposes (e. g. taking photography of you) based on your prior written consent.



- 6.2 Your Personal Data may be used by us, our employees, workers and contractors, service providers, and disclosed to third parties for the following purposes:
  - Communicating between you and us.
  - Determining the terms on which you would work for us.
  - Creating of the employment relationship.
  - Checking you are legally entitled to work in your place of employment.
  - Making decisions about salary reviews and compensation.
  - Assessing qualifications for a particular job or task.
  - Education, training and development requirements.
  - Using and protecting of your or our rights and obligations in the future.

## 7. WHO MAY WE DISCLOSE YOUR PERSONAL DATA TO?

- 7.1 You are hereby informed that we may share your Personal Data with:
  - other companies and entities within the PFN Group and limited number of authorized employees of the PFN Group;
  - recruitment businesses (in relation to feedback on your recruitment process) and temporary work agencies (in relation to the administration of arrangements relating to temporary workers);
  - other professional advisers (including accountants, auditors, consultants and lawyers) that assist us in carrying out our business activities;
  - law enforcement authorities, public administration authorities and financial authorities, insurance companies, banks, inspecting authorities; and
  - third parties if we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation or instructions of a regulatory body (including in connection with a court order), or in order to enforce or apply the terms of any agreements we have with or otherwise concerning you (including agreements between you and us) or to protect our rights, property or safety of our clients, employees or other third parties.

## 8. WHERE WILL WE TRANSFER YOUR PERSONAL DATA?

- 8.1 We may transfer your Personal Data within the PFN Group, including outside the European Union (EU) and European Economic Area (EEA). Where we transfer Personal Data outside of the EU or EEA, we will implement appropriate and suitable safeguards to ensure that such Personal Data will be protected as required by applicable data protection law.
- 8.2 Where your Personal Data is transferred within PFN Group, the safeguards which we typically put in place are data transfer agreements compliant with the European Standard Contractual Clauses.
- 8.3 We may disclose your Personal Data to third-party providers, agents or contractors that provide us services which require the processing of your Personal Data, and only for purposes provided in this applicants privacy policy. We will only transfer your Personal Data to any third-party provider, agent or contractor that provide assurances that it will protect your Personal Data disclosed to it in accordance with the provisions of this applicants privacy policy and pursuant to a written agreement binding over such provider, agent or contractor.
- 8.4 Where your Personal Data is transferred to any third party, and where it is mandated by applicable law, we implement the appropriate measures to ensure that your Personal Data is treated by the recipients in a way that is consistent with and which respects the applicable privacy and data protection laws through the execution of standard contractual clauses or any other relevant mechanism recognized by the GDPR.
- 8.5 For further information as to the safeguards we implement please contact our Privacy team by e-mail at the addresses indicated in Article 14 Contact.



### 9. HOW LONG WILL WE KEEP YOUR PERSONAL DATA

- 9.1 We will only retain your Personal Data for as long as necessary to fulfil the purposes we collected it for. In most cases, the commonly-applied retention period will be computed on the basis of the duration of your hiring relationship with us, augmented by any statutory requirements and locally applicable statutes of limitations. For detailed information on our approach to data retention, including retention periods for different categories of personal data, or should you have any question, please contact your local HR manager.
- 9.2 Please note that all retention periods may be extended where we need to preserve and use Personal Data for the purposes of bringing or defending a legal claim. In such cases, we will continue to hold and process your Personal Data for as long as is necessary to deal with the legal proceedings.

#### **10.** YOUR RIGHTS ON YOUR PERSONAL DATA

- 10.1 It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during the recruitment process.
- 10.2 Under certain circumstances, by law you have the right to:
  - **Request access to your Personal Data** (commonly known as a "*data subject access request*"). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.
  - **Request correction of the Personal Data** that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
  - **Request erasure of your Personal Data**. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have exercised your right to object to processing (see below).
  - **Object to processing of your Personal Data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your Personal Data for direct marketing purposes.
  - Request the restriction of processing of your Personal Data in certain circumstances. This enables you to ask us to suspend the processing of Personal Data about you, for example (i) where you think your Personal Data is inaccurate and only for such period to enable us to verify the accuracy of your Personal Data; (ii) the use of your Personal Data is unlawful and you oppose the erasure of your Personal Data and request that it is suspended instead; (iii) we no longer need your Personal Data, but your Personal Data is required by you for the establishment, exercise or defence of legal claims; or (iv) you have objected to the use of your Personal Data and we are verifying whether our grounds for the use of your Personal Data override your objection.
  - **Request the portability of your Personal Data**. This enables you to obtain Personal Data you actively and knowingly provided us with in a structured, commonly used and machine-readable format and for it to be transferred to another organisation, where it is technically feasible. The right only applies where the use of your Personal Data is based on your consent or for the performance of a contract, and when the use of your Personal Data is carried out by automated (i.e. electronic) means.
  - In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your Personal Data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our Privacy team at the addresses indicated below in Article 14 Contact. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
- 10.3 You can review, verify, correct or request erasure of your Personal Data by contacting our Privacy team at the addresses indicated below in Article 14 Contact.



- 10.4 If you want to object to the processing of your Personal Data, or request that we transfer a copy of your Personal Data to another party, please contact our Privacy team at the addresses indicated below in Article 14 Contact.
- 10.5 You will not have to pay a fee to access your Personal Data or to exercise any of the other rights. However, we may charge a reasonable fee if your request is clearly unfounded or excessive.
- 10.6 We will engage with you when you place such a request within 30 days from receipt. Please note that we may not fully comply with your request, where we have a legitimate interest for us to do so (in which case we will inform you thereabout) or, as applicable, it would adversely affect the rights and freedoms of others.

# 11. HOW DO WE PROTECT YOUR INFORMATION?

- 11.1 We will use appropriate technical and organizational measures to safeguard your Personal Data against loss, misuse, unauthorized access, theft, modification, disclosure and destruction.
- 11.2 We process your Personal Data in paper form (e. g. personal files) or in electronic form in Databases (e. g. SAP).
- 11.3 We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.
- 11.4 We also limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Data on our instructions and they are subject to a duty of confidentiality, as well as they are obliged to implement appropriate technical and organizational measures to ensure the security of your Personal Data.

# 12. CHANGES TO OUR APPLICANT PRIVACY POLICY

- 12.1 We reserve the right to change and update this Privacy Policy at any time. We are then allowed to publish the amended versions on our website instead of the current version of the Privacy Policy, without any notice. The updated applicants privacy policy will take effect as soon as it has been updated or otherwise communicated to you.
- 12.2 This applicants privacy policy was last updated on 01 July 2021.

## **13. C**ONTACT

- 13.1 If you have any questions about this applicants privacy policy, please contact the Privacy team at : privacy@pfnonwovens.com; or to one of the following addresses :
  - For the US: 101 Green Mountain Road Humboldt Industrial Park Hazleton, PA 18202, USA
  - For Czech Republic: Hradčanské náměstí 67/8, Hradčany, 118 00 Prague 1, Czech Republic
  - For Egypt: Plot No. O6,O8 in Zone No. 3 at the Northern Expansions Area and its Extension, 6th of October City, Giza, Egypt,
  - For RSA: 6 Charles Matthews Street, Atlantis Industrial, Cape Town, 7349, RSA
- 13.2 You have the right to make a complaint at any time with your national data protection authority or other public authority governing the protection of your Personal Data. We would however appreciate the chance to deal with your concerns before you approach such regulatory authority so please contact the Privacy team in the first instance.
- The competent supervisory authority in the Czech Republic is the Office for the Protection of Personal Data. Full details regarding the language requirements and the form of the complaint may be accessed on the website of the Office for the Protection of Personal Data: <u>https://www.uoou.cz/</u>.
- The competent supervisory authority in South Africa is the Information Regulator. Full details regarding the language requirements and the form of the complaint may be accessed on the website of the Information Regulator: <u>https://www.justice.gov.za/inforeg/</u>.



The competent supervisory authority in Egypt is the Personal Data Protection Center. Full details regarding the language requirements and the form of the complaint may be accessed on the website of the Information Regulator: <u>https://www.justice.gov.za/inforeg/</u>.

The competent supervisory authority in Pennsylvania is the Attorney General. Full details regarding the language requirements and the form of the complaint may be accessed on the website of the Information Regulator: https://www.attorneygeneral.gov/taking-action/press-releases/attorney-general-josh-shapiro-takes-action-to-preserve-pennsylvania-authority-to-protect-consumers-against-data-breaches/ .