

Privacy notice for customer representatives

What is the purpose of this document?

All companies within Rosti are committed to protecting the privacy and security of your personal information.

This privacy **notice** describes how we collect and use personal information about you – as customer representative – in preparation to, during and after the business relationship between Rosti and your company, in accordance with the General Data Protection Regulation (GDPR).

It applies to all individuals that are EU citizens or whose personal data is being processed by a Rosti entity based in the EU.

Rosti Group AB and its subsidiaries, jointly referred to as “Rosti” are “data controllers”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy **notice**.

This **notice** applies to prospective, current and former representatives of Rosti’s customers. We may update this **notice** at any time but if we do so, we will provide an updated copy of this **notice** as soon as reasonably practical on www.rosti.com.

It is important that you read and retain this **notice**, together with any other privacy **notice** we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under the data protection legislation.

Data Protection Principles

We will comply with the applicable data protection laws. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We will collect, store, and use the following categories of personal information about you:

- **Contact data:** name, email address, telephone number
- **Individual data:** language, photo, date of birth (to the extent provided)
- **Organizational data:** company name, job position, place of work, country
- **Business related data:** personal data included in purchase orders, quality documentations, email correspondences, contracts and other agreements between you and Rosti and related business documentations
- **Onsite visit data:** CCTV footage and other relevant personal data processed for security reasons while you are visiting a Rosti site

If agreed separately with you, we will also process passport information and similar personal data for the purpose of assisting you with visa applications and/or other travel arrangement.

How is your personal information collected?

We collect personal information about customer representatives directly from you or your employer or principal.

How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
4. Where we need to protect your vital interests.

Situations in which we will use your personal information

We will process your personal data based on one of the following legal grounds and for the following purposes.

- **Legal obligation.** Where we are obliged by law to process personal data, e.g. report transactions to a tax authority requiring us to process your personal data.

- **Contractual obligation.** Where we are required to process your personal data to fulfil the terms and agreements of an order or contract accepted by your employer or principal.
- **Legitimate interests.** Our legitimate interests include the interest to manage its daily operations according to lawful and fair business practices including managing its relationships with its customer in order to perform contract(s) to which your employer or principal is a party and/or to take steps necessary prior to entering into a contract with your employer or principal. For example,:
 - sending invitations to events organized by us,
 - sending process improvement surveys, or
 - for services purposes, such as providing you food while visiting a Rosti site, assisting you with travelling arrangement when needed.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

What happens if you do not provide us with personal data?

Some personal data is necessary in order for us to interact with you as a customer for business purposes. Not providing personal data may limit the handling and delivery of the products and services that your employer might expect from us.

Data sharing

We may have to share your data with third parties, including third-party service providers and other entities in the Rosti group.

We require third parties to respect the security of your data and to treat it in accordance with the law.

As Rosti is an international company group we will transfer your personal information outside the EU when required for the fulfilment of the legal ground for processing.

If we do, you can expect a similar degree of protection in respect of your personal information.

Why might you share my personal information with third parties?

We will normally not share your personal data with anyone outside of Rosti group, unless required by law or regulation or in order to perform our contractual obligations.

If required and necessary to fulfil the defined purpose we will share your personal data with third party companies and suppliers including companies and suppliers outside the EU/EEA. "Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group.

The following categories of third parties will normally be engaged by us: sub-suppliers, logistics companies, design agents, legal advisors, auditors, custom agents, customer appointed business partners, insurance companies, banks and IT services.

How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Transferring information outside the EU

If necessary, we will transfer the personal information we collect about you to our entities in China, Malaysia and/or Turkey or customer appointed business partners located in other country as you may instruct, in order to perform our contract with you.

We will secure that appropriate safeguards are in place which provide adequate levels of protection of your personal data as required by applicable data protection laws. Any transfers will be made to countries which are considered by the European Commission to provide an adequate level of protection for your personal information or where the receiving party has signed an agreement based on the European Commission's approved Standard Contractual Clauses or such other mechanisms as have been recognized or approved by the relevant authorities from time to time. If you have questions about the transfer, please contact our data protection officer.

Data security

We have put in place measures to protect the security of your information.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from our data protection officer.

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.

Data retention

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Back-ups are stored at a high-security data centre in Denmark and are only accessible to a limited number of our IT managers.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once the personal data is no longer relevant or necessary, we will retain and securely destroy your personal information in accordance with our data retention policy and applicable laws and regulations.

Your data protection rights

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information 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 information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).

- **Object to processing** of your personal information 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 information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our data protection officer.

You have the right to lodge a complaint with the Swedish Data Protection Authority (Sw. Datainspektionen, www.datainspektionen.se) or with the Data Protection Authority of your country of residence if you believe that Rosti is in breach of the Data Protection Laws.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information 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 [POSITION]. 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.

Data Protection Officer

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO.

You have the right to lodge a complaint with the Swedish Data Protection Authority (Sw. Datainspektionen, www.datainspektionen.se) or with the Data Protection Authority of your country of residence if you believe that Rosti is in breach of the Data Protection Laws.

CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

How to contact us

If you have any questions about how we process your personal data, please feel free to contact our data protection officer by sending an email to dpo@rosti.com.

The following legal entities are a part of the Rosti group

Rosti Group AB, company no. 556308-9456, a company organised and existing under the laws of Sweden with registered office at Anna Lindhs plats 4, 211 19 Malmö, Sweden, telephone: +46 40 204 701

Rosti GP AB, company no. 556307-6685, a company organised and existing under the laws of Sweden, with registered office at Baldersvägen 35, SE-332 35 Gislaved, Sweden, telephone: +46 371 846 50.

Rosti GP Germany GmbH, company no. HRB 21813, a company organised and existing under the laws of Germany with registered office at Heilbronner Straße 18, DE-01189 Dresden, Germany, telephone: +49 351 40 46 00.

Rosti UK Ltd, company no. 09847166, company organised and existing under the laws of England with registered office at Bridge Works, Stamford Bridge, York, YO41 1AL, United Kingdom, telephone: +44 1759 371551

Rosti Business Development Ltd, company no. 11192743, company organised and existing under the laws of England with registered office at Centrix Keys

Business Village, Keys Park Road, Hednesford, Cannock, United Kingdom, WS12 2HA, telephone: +46 40 204 701.

Rosti Integrated Manufacturing Solutions (Suzhou) Limited, a company organised and existing under the laws of China with registered office at 1 Huazheng Street Suzhou Industrial Park Jiangsu Province 215026, People's Republic of China, telephone:+86 512 6295 2000.

Rosti IMS Sdn. Bhd., company no. 982244 T, a company organised and existing under the laws of Malaysia with its registered address at Suite 7E, Level 7, Menara Ansar, 65 Jalan Trus, 8000 Johor Bahru, Johor, Malaysia, telephone: +60 197 232 322.

Rosti Poland Sp. z o.o., company no. KRS 0000371393, a company duly organized and existing under the laws of Poland with its registered address at ul. Myśliwska 18, 15-569 Białystok, Poland, telephone: +48 85 678 3500.

Rosti Romania S.R.L, 56476 (Prahova), a company organised and existing under the laws of Romania with its registered address at Strada Principala Ploiesti West Park, Clădirea SE, 107025 Aricestii Rahtivani, România, telephone: +40 037 498 2080

Tebplast Plastik Sanayi ve Ticaret Anonim Şirketi, company no. 148/4 (Istanbul) a company organised and existing under the laws of Turkey with its registered address at Beylikdüzü Osb Mh. Bakır-Prinç San. Sit. Sardunya Cd. No:1, Istanbul, Turkey, telephone: +90 (212) 875 11 75-76