

## HEMANEXT'S PERSONNEL DATA PROTECTION NOTICE

**Date of last update: August 2, 2022**

### 1. NOTICE STATEMENT

**Hemanext** (the "**Company**") has prepared this Hemanext's Personnel data protection notice (the "**Notice**") to describe its practices regarding the collection, use, storage, transfer and other processing of individually identifiable information about human resources ("**Personal Data**"). The Company is the controller responsible for the Personal Data that we collect and process as described in this Notice.

For the purposes of this Notice, "**Hemanext's Personnel**" means:

- Past and present employees;
- Past and present consultants, independent contractors, and agents;
- Job applicants;
- Temporary employees;
- Retirees; and
- Past and present directors and officers.

### 2. WHAT PERSONAL DATA WE COLLECT AND HOW WE USE IT

Good employment practices and the effective running of our business require the Company to collect, use, store, transfer and otherwise process certain Personal Data.

#### 2.1 What Personal Data we collect and use

The Company collects the majority of the Personal Data below directly from its Hemanext's Personnel (or in the case of consultants, independent contractors and agents employed by a third party agency, directly from their employers or agents) with the exception of some categories of Personal Data which the Company generates. The Company generates, for example, appraisals and absence records.

The categories of Hemanext's Personnel Personal Data that the Company uses are, to the extent permitted by applicable local law and as applicable for each category of Hemanext's Personnel:

- **Payroll processing data and compensation details:** this includes without limitation banking details, base salary, bonus, benefits, pay enhancement for dependents, salary step within assigned grade,

details on stock options, stock grants and other awards, currency, pay frequency, effective date of current compensation, salary reviews, tax ID and fiscal code;

- **Personal details and contact information:** this includes without limitation name, maiden name and surname, professional e-mail and telephone details, home address, date of birth, national identification number, gender, marital status, dependents, emergency contact information, and photograph;
- **Right to work/immigration data:** this includes without limitation citizenship, passport data, identity card data, details of residency or work permit, if necessary;
- **Talent, recruitment and application details, education and training details:** this includes without limitation details contained in letters of application and resume/CV, previous employment background and references, education history, professional qualifications, language and other relevant skills, details on performance management ratings, development plan and willingness to relocate;
- **Work and work history:** this includes without limitation description of current position, title, salary plan, pay grade or level, unit/department, location, supervisor(s) and subordinate(s), Hemanext's Personnel identification number, employment status and type, terms of employment, employment contract, work history, re-hire and termination date(s), length of service, retirement eligibility, promotions and disciplinary records;
- **Work schedule data:** this includes without limitation working time records (including vacation, sickness leave and other absence records, leave status, hours worked and department standard hours), overtime and shift work and termination date.

## 2.2 How we use Personal Data

The Company uses the Personal Data listed above for the following purposes, except where restricted by local law. In particular, the Company uses Hemanext Personnel's' Personal Data for these purposes to comply with its contractual obligations:

- **Managing workforce:** managing work activities and personnel generally, including appraisals, promotions, succession planning and career development, administering salary and payment administration and reviews, wages and other awards such as stock options, stock grants and bonuses, healthcare, life insurance and other benefit administration, social security, pensions and savings plans, training (including distribution of company policies and training materials to Hemanext's Personnels), leave, promotions, transfers, secondments, honouring other contractual benefits, loans, compilation of Hemanext's Personnel directories, managing disciplinary matters and terminations, making business travel arrangements;

- **Communications and emergencies:** facilitating communication with Hemanext's Personnel, providing references, protecting the health and safety of Hemanext's Personnel and others, facilitating communication in an emergency.

The Company uses Personal Data for the purposes below to comply with its legal obligations:

- **HR Management:** performing background checks as required by applicable laws, conducting checks against exclusion and sanction lists as required by applicable laws;
- **Compliance:** complying with legal and other requirements, such as income tax and national insurance deductions, record-keeping and reporting obligations, conducting audits, compliance with government inspections and other requests from government or other public or regulatory authorities, and complying with internal policies and procedures; and
- **Monitoring:** to the extent permitted by applicable law, monitoring compliance with internal policies, including the policies with regard to telephone, email, Internet and other company resources and other monitoring activities as permitted by applicable laws.

The Company also uses Personal Data for the following purposes: operating and managing the IT and communications systems, managing product and service development, improving products and services, managing company assets, allocating company assets and human resources, strategic planning, project management, business continuity, compilation of audit trails and other reporting tools, maintaining records relating to manufacturing and other business activities, budgeting, financial management and reporting, communications, managing mergers, acquisitions, and re-organization or disposals, ensuring business continuity, safeguarding IT infrastructure, office equipment and other property, performing workforce analysis and planning, responding to legal process such as subpoenas, pursuing legal rights and remedies, defending litigation and managing any internal complaints or claims. It is in the Company's legitimate interests to use Personal Data for these purposes as such uses allow the Company to manage well its resources, plan for the future and protect its rights. Where the Company processes Personal Data to meet its legitimate interests, the Company balances these against Hemanext's Personnel's fundamental rights and freedoms and puts in place safeguards to protect Hemanext's Personnel's privacy.

## 2.3 Sensitive Personal Data

The Company may collect and process certain special categories of Personal Data ("**Sensitive Personal Data**") about Hemanext's Personnel where necessary and in compliance with applicable local data protection laws, in particular, to carry out its obligations in the field of employment, social security and social obligations law and, where necessary, for the establishment or defence of legal claims.

## 2.4 Personal Data about Dependents

If an Hemanext's Personnel provides the Company with Personal Data such as contact information or other personal data about beneficiaries, domestic partners, family members and emergency contacts, it is that Hemanext's Personnel's responsibility to inform such individuals of their rights and to obtain their explicit consent, where

necessary, to the processing (including transfers) of that Personal Data, where necessary and in compliance with applicable local data protection laws, as set out in this Notice.

### **3. HOW WE STORE PERSONAL DATA AND WHO CAN ACCESS IT**

The Company maintains an automated record of each Hemanext's Personnel's Personal Data. This automated record contains most of the data held in the Hemanext's Personnel's personnel file. Additionally, the Company maintains Personal Data in various human resources applications, including applications for payroll, benefits, talent management and performance management. The Company may maintain individual hard-copy personnel files. The Human Resources Department maintains these files in a secure environment.

Access to Personal Data is restricted to those individuals who need such access for the purposes listed above or where required by law, including members of the Human Resources Department, the managers in the Hemanext's Personnel's line of business, and to authorised representatives of the Company's internal control functions such as Compliance and Legal. Access may also be granted on a strict need-to-know basis to other managers in the Company where relevant if for example the Hemanext's Personnel is being considered for an alternative job opportunity, or if a new manager appointed in the line of business needs to review files. All Hemanext's Personnel, including managers, are bound by the requirements of this Notice.

### **4. DISCLOSURE AND INTERNATIONAL TRANSFERS OF PERSONAL DATA**

The Company may disclose in accordance with applicable law relevant Personal Data to certain third parties in connection with the provision of the following services to the Company:

- business, administrative, and management functions – for example the Company may partner with third parties to optimize its services, support emails, messaging services and analyse information;
- payment of salary, bonus, allowances and other payments;
- the provision of benefits, including but not limited to medical insurances under the terms of the Hemanext's Personnel's employment;
- auditing and other external professional advising services, IT systems and consulting services.

Where the Company engages a third party processor to process Personal Data on its behalf, such as those listed above, the Company will delegate such processing in writing, will choose a processor that provides sufficient guarantees with respect to technical and organisational security measures governing the relevant processing, and will obligate the processor to act on the Company's behalf and under the Company's instructions. In addition, the Company will impose in writing appropriate data protection and information security requirements on such third party processors.

From time to time, the Company may also need to disclose Personal Data to other parties, such as any person (natural or legal) or organisation to whom a Hemanext entity may be required by applicable laws to disclose Personal Data, including, but not limited to, law enforcement authorities, financial institutions, and central and local government. The Company may share Personal Data with these third parties where it believes this is necessary to comply with a legal or regulatory obligation, or otherwise to protect its rights or the rights of any third party.

Because the Company operates as part of a global business, the recipients mentioned above may be located outside the country in which Hemanext's Personnel are based. Where the recipients are located in countries where data protection laws may not provide an equivalent level of protection to the laws of the Hemanext Personnel's' home country, to protect Hemanext Personnel's Personal Data the Company will put in place appropriate safeguards (such as data transfer agreements based on the European Commission's standard contractual clauses) in accordance with applicable legal requirements. If you have any questions in relation to the appropriate safeguards put in place by the Company including obtaining a copy of the safeguards or about the recipients mentioned in this section, please contact [jill.buckley@hemanext.com](mailto:jill.buckley@hemanext.com).

#### **4.1 International Transfers of Personal Data**

Given the global nature of the Company, the Company will (subject to applicable law) transfer Personal Data to Hemanext entities overseas ("**Data Importers**"). These Data Importers may include offices located in the United States and other countries where data protection laws do not provide an equivalent level of protection to the laws in the Hemanext's Personnel's home jurisdiction. Such Personal Data will be transferred for the purposes set out in paragraph 2.2 above and in a way that provides adequate protection of your Personal Data.

As data in jurisdictions where Data Importers are located may not provide an equivalent level of protection transfers of personal data are implemented by the Company in accordance with applicable European and local law and the Company shall only transfer Personal Data to recipients offering adequate protection. In particular, as indicated above, the Company has put in place appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that Hemanext's Personnel Personal Data is adequately protected.

#### **4.2 International Transfers of Sensitive Personal Data**

As part of the international transfers of Personal Data described above and to the extent permitted by applicable law, the Company will transfer the Sensitive Personal Data described in paragraph 2.3 above to Hemanext entities located in the United States and other countries where data protection laws do not provide an equivalent level of protection to the laws in the Hemanext's Personnel's home jurisdiction. Such Sensitive Personal Data will be transferred for the purposes set out in paragraph 2.3 above and in a way that provides adequate protection of your Personal Data. In particular, the Company has put in place appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that Hemanext's Personnel Personal Data is adequately protected.

If you have questions in relation to the transfer of Personal Data, including Sensitive Personal Data, and the appropriate safeguards put in place by the Company, please contact [jill.buckley@hemanext.com](mailto:jill.buckley@hemanext.com).

## 4.3 Additional Disclosures of Personal Data

Personal Data also may be disclosed, where permitted by applicable law, in connection with a corporate restructuring, sale, or assignment of assets, merger, divestiture, or other changes of the financial status of the Company or any of its affiliated entities.

Personal Data also may be released to protect the vital interests of Hemanext's Personnel, to protect the legitimate interests of the Company (unless this would prejudice the rights and freedoms or interests of the Hemanext's Personnel), or in the Company's judgment to comply with applicable law, legal or regulatory obligations or regulatory inquiries or requests.

The recipients of these disclosures may be located in countries where data protection laws may not provide an equivalent level of protection to the laws in the Hemanext's Personnel's home jurisdiction.

## 5. INFORMATION SECURITY

The Company maintains appropriate technical and organisational measures to protect against unauthorised or unlawful processing of Personal Data and/or against accidental loss, alteration, disclosure or access, or accidental or unlawful destruction of or damage to Personal Data. These measures are aimed at ensuring the on-confidentiality, integrity and availability of Personal Data. The Company evaluates these measures on a regular basis to ensure the security of the processing.

## 6. DATA RETENTION

The Company will retain Personal Data in accordance with applicable legal requirements, and only for as long as necessary for the purposes described in sections 2.2 and 2.3 or as long as required by law or to defend potential legal claims.

## 7. HEMANEXT'S PERSONNEL'S RIGHTS

Subject to certain exceptions Hemanext's Personnel are entitled to request access to Personal Data held about them by Hemanext. In addition to the extent required by applicable law, Hemanext's Personnel have the right to have inaccurate data corrected or removed and also have the right to object to the processing of their Personal Data. Subject to applicable law, Hemanext's Personnel also have the right to: (i) restrict the Company's use of their Personal Data; (ii) receive their Personal Data in a usable electronic format and transmit it to a third party (right to data portability); and (iv) lodge a complaint with their local data protection authority. Hemanext's Personnel can exercise these rights by contacting [jill.buckley@hemanext.com](mailto:jill.buckley@hemanext.com).

Where the Company has obtained Hemanext's Personnel consent for the processing of their Personal Data, Hemanext's Personnel have the right to withdraw such consent at any time by contacting [jill.buckley@hemanext.com](mailto:jill.buckley@hemanext.com).

For France, Hemanext's Personnel also have the right to provide guidelines about the processing of their personal data after their death, by contacting [jill.buckley@hemanext.com](mailto:jill.buckley@hemanext.com).

## 8. QUESTIONS

For any questions regarding this Notice Hemanext's Personnel should contact: [jill.buckley@hemanext.com](mailto:jill.buckley@hemanext.com).

The Company is committed to working with its Hemanext's Personnel to obtain a fair resolution of any complaint or concerns about privacy. If, however, you believe that the Company has not been able to assist with your complaint or concern, you have the right to make a complaint to the data protection authority of your country.

## 9. NOTICE UPDATES

In case of any material changes to the way in which the Company collects or uses Personal Data, the type of Personal Data it collects or any other aspect of this Notice, the Company will notify Hemanext's Personnel as soon as possible by reissuing a revised Notice.