

General Privacy & Cookie Notice (“Notice”)

Updated: 9th January 2025

A. Introduction

This Notice of SCHOELLER HOLDINGS LTD of Cyprus and its affiliated companies (referred to as “we”, “our”, “us”, or “SHL”) describes how SHL collect, handle, and process your personal data, and how, in doing so, we comply with our legal obligations. The use of the word “processing” in this Notice is intended to include such actions as collecting, handling, using, storing and protecting your personal data.

This Notice applies to the personal data of Data Subjects such as yourself, our **employees, customers, visitors, suppliers of goods and services, website users**, and others whom we may contact in order to collect more information about our Employees.

B. Legal framework

This Notice is written to comply with the applicable data protection legislation which includes, but is not limited to, the European Union General Data Protection Regulation (GDPR).

C. Personal Data

For the purpose of this Notice, “personal data” means any and all online or offline information, whether true or not, that identifies a person or makes a person identifiable. This includes, but is not limited to names, addresses, telephone numbers, email addresses, usernames and passwords, photographs, social security numbers, personal identification numbers, financial data, and employment related information.

How do we use personal data?

SHL may collect and process personal data from you and your devices . Such processing may include, but is not limited to, communicating with you, employment contracts, anti-money-laundering, risk management, document processing, marketing and for other legitimate business purposes.

What personal data do we collect?

Employees:

In order to consider you for employment, or employ you, we need to process certain information about you. We only ask for or collect details that help us provide what is required as part of your application process or employment. Where appropriate, and in accordance with local laws and requirements, we may also collect information of a more sensitive nature, such as diversity information, information related to your health, union membership, or details of any criminal convictions.

We use processors who are third parties who provide elements of services for us. We have contracts in place with our processors. This means they cannot do anything with your personal data unless

we have instructed them to do it. They will not share your personal data with any organisation apart from us. They shall keep it securely, for the period we instruct.

Where such processing occurs, relevant privacy information shall be provided at the point of collection of personal data.

To enable shore employees to conduct our business, they have been provided with access to one another's contact information including name, position, telephone number, work address, work e-mail address, and photograph (should you choose to provide one).

Employees should be aware that photographs and videos are taken on our premises and during events we organise; selections of such material may be used for company marketing purposes (for example on our website or in promotional leaflets or posters) and their image or parts of their image may appear in the material or the background of said material.

Training and maintaining proficient and qualified employees is of great importance to us. To this end we use several training systems provided and maintained by third-party providers.

Customers

To enable us to communicate with you and to ensure that we meet certain legal requirements such as KYC (know your customer) and AML (anti-money-laundering), we need to have certain details of yours or details of individual contacts at your organisation (such as their names, telephone numbers and e-mail addresses).

We ensure that our marketing communications to you are relevant and timely.

Website Users

We collect a limited amount of personal data in order to improve your experience when using our website.

This includes information such as the frequency with which you access our website, and the times that our website is most popular.

Suppliers of goods and service

We collect a small amount of information from our Suppliers to ensure that operations work properly. We need contact details of relevant individuals at your organisation so that we can communicate with you. We also need other information such as your bank details so that we can pay for the services you provide (if this is part of the contractual arrangements).

Visitors

When visiting our premises, we collect the necessary personal data required for security and notification purposes. For security purposes, we also operate a closed circuit television system (CCTV). The CCTV cameras only operate in common areas of our premises and are positioned so as not to intrude on privacy. The footage is kept for no longer than a month and access is strictly regulated.

Processing related to SHL events

Please be aware that photographs will be taken during SHL events which might be used for SHL website/publications. If you do not wish to be photographed please contact us.

The legal bases we use for lawful processing

In order to conduct business and fulfil our legal, regulatory, and contractual obligations, we need to perform legitimate and fundamental processing activities. These are:

1. Establishing contracts
2. Maintaining contracts
3. Provision of all contracted services
4. Invoicing: remittance, payments, and collections
5. Non-promotional communications
6. Marketing and other promotional communications
7. Risk management contract review
8. Response to subject requests
9. Performance measurement
10. IT and telecommunication support services
11. Business continuity and contingency planning
12. Legal and regulatory obligations
13. Responding to enquiries, requests, and complaints
14. Employment processing
15. Workforce planning
16. Training and certifications
17. Emergency communications
18. Interacting with other organisations, industry groups, and professional associations
19. Internal ethics reporting, security, and investigations

Who will access or receive the personal data?

We need to share the personal information we process with individuals themselves and also with other organisations. The list below contains a description of the types of organisations with which we may need to share some of the personal information we process.

1. SHL affiliated companies for operational and business purposes
2. Agents and brokers
3. Business associates, other professional bodies, and advisers

4. Central and local government
5. Claimants, beneficiaries, assignees, and payees
6. Claims investigators
7. Complainants, and enquirers
8. Courts and tribunals
9. Credit reference, debt collection, and tracing agencies
10. Current, past, and prospective employers
11. Customers
12. Debt collection and tracing agencies
13. Education and examining bodies
14. Employment and recruitment agencies
15. Family, associates, and representatives of the person whose personal data we are processing
16. Financial organisations and advisers
17. Healthcare professionals, social and welfare organisations
18. Insurance providers
19. Law enforcement and prosecuting authorities
20. Learning management system providers
21. Ombudsman and other regulatory authorities
22. Open reporting system providers
23. Other affiliated companies
24. Pension schemes
25. Police forces
26. Private investigators
27. Professional advisers
28. Share administrators
29. Suppliers and services providers
30. Survey and research organisations
31. Training system and software providers

32. Unions, trade associations, professional bodies, and employer associations

The countries where personal data will be stored, processed and/or transferred

Your personal data we collect may be stored and processed in the EU or any other country in which we or associated third parties maintain facilities. In case we need to transfer your personal data, we will take all reasonable measures to safeguard the transfer of your personal data to third parties in a manner that complies with the applicable data protection laws.

How long will the personal data be retained?

Retention of specific records may be necessary for one or more of the following reasons:

1. Fulfilling statutory or other regulatory requirements
2. Evidencing events/agreements in case of disputes
3. Operational needs
4. Historical and statistical purposes

Where we collect personal data for which we subsequently have no use for any business purpose we will then review and may destroy such personal data at our discretion.

The right to withdraw consent

In situations where we request and receive your consent to perform processing, we are also obliged to stop such processing if you decide to withdraw your consent. Withdrawing consent is as straightforward as giving consent. Withdrawing consent cannot be back-dated so it has no effect on processing already performed during the period of consent.

The right to access, change, delete, restrict, object, request a copy

Under certain circumstances you have rights regarding your personal data. These are:

1. Access to a copy of your personal data
2. Object to processing of your personal data
3. Stop receiving direct marketing material
4. Object to decisions being taken by automated means
5. Have inaccurate personal data rectified, blocked, erased or destroyed
6. Lodge a complaint with the relevant data protection authority
7. Claim compensation for damages caused by a breach of the GDPR

If you are an employee, and wish to exercise any of these rights, please follow the relevant Company procedure. If you are not an employee, please contact SHL directly.

What happens if the personal data is not collected?

Your personal data is required for communication and setting up a contractual agreement to provide employment, products, and services. Without this data we will not be able to communicate with you or enter into a contractual agreement with you. This includes both business and employment contracts.

We need personal data to:

1. Enable consensual bilateral communications
2. Engage in pre-contractual activities
3. Honour contractual obligations
4. Be able to employ people

Without this personal data, we will not be able to perform these primary activities.

Automated decision making

We do not use automated decision making.

D. Cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. We use necessary cookies to make our website work. We would also like to set analytics cookies that help us make improvements by measuring how you use the website.

Necessary cookies

Necessary cookies are crucial to your experience of a website, enabling core features like user logins, account management, shopping carts, and payment processing. Necessary cookies enable core functionality such as security, network management, and accessibility. You may disable these by changing your browser settings, but this may affect how the website functions.

We use necessary cookies to enable certain functions on our website.

Functional cookies

Functional cookies are used to collect information about your device and any settings you may configure on the website you're visiting (like language and time zone settings). With this information, websites can provide you with customised, enhanced, or optimised content and services. These will be off by default and set only if you accept.

Performance cookies

Performance cookies track how you use a website during your visit. Typically, this information is anonymous and aggregated, with information tracked across all website users. They help companies understand visitor usage patterns, identify and diagnose problems or errors their users may encounter, and make better strategic decisions in improving their audience's overall website experience. The cookies collect information in a way that does not directly identify anyone.

These will be off by default and set only if you accept. We use performance cookies on our website.

Targeting cookies

Targeting cookies help determine what promotional content is most relevant and appropriate to you and your interests. Websites may use them to deliver targeted advertising or limit the number of times you see an advertisement. This helps companies improve the effectiveness of their campaigns and the quality of content presented to you. These will be off by default and set only if you accept. Targeting cookies set by third-parties may be used to track you on other websites that use the same third-party service.

Analytics cookies

We would like to set Google Analytics cookies to help us improve our website by collecting and reporting information on how you use it. The cookies collect information in a way that does not directly identify anyone. These will be off by default and set only if you accept.

How do I change my cookie settings?

You can change your cookie preferences relating to our website at any time by clicking on the 'Cookie Settings' link on website's footer section. You can then adjust the available buttons to 'Allow All' or 'Reject All', then clicking 'Confirm My Choices'. You may need to refresh your page for your settings to take effect.

Alternatively, most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set, we recommend to visit www.aboutcookies.org or www.allaboutcookies.org.

To find information relating to your specific browser, please visit your browser's website.

E. Changes to our Notice

Any changes we make to our Notice in the future will be posted on this website. Please check back frequently to stay informed of any updates or changes.

Where we intend to further process your personal data for a purpose other than that for which the personal data were collected, we shall provide you, prior to that further processing, with information on that other purpose and with any relevant further information.

F. Contact Us

If you have any questions about this Notice or our privacy practices, please contact us in writing at 18 Dodekanison, 4043 Germasogeia, Limassol, Cyprus or alternatively via email at info@schoeller-holdings.com or via telephone at +357 25 843100.

G. DISCLAIMER

Affiliated companies of SCHOELLER HOLDINGS LTD may make information available on this website for information purposes only. No liability of any kind is accepted to users of the site.

The information on this website is provided on an "as is" and "as available" basis, without prejudice. SHL does not warrant or represent that the information on this website is accurate, complete, or up to date, and will not be liable for any damages, direct, indirect, special, punitive, or consequential, arising out of or in connection with the use, contents, or information of this website, which is intended for general guidance only and is subject to changes without prior notice. SHL, its principals, directors, officers, and employees make no representations or warranties of any kind, express or implied, on this website. Before acting on any information from this website, users should take appropriate steps to verify its accuracy.

H. Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.