

# **Privacy Statement**

The subsidiaries organized under SGS Holding Deutschland B.V. & Co. KG ("SGS" or "SGS Group Germany") take security and data protection regarding the personal data obtained in the course of their activities very seriously. For this reason, our websites are operated in accordance with the respective applicable laws on data protection. In the following, we will explain what data we store, how we handle this data and to whom we make it available.

When you visit a website of any SGS company or use our services, you expressly agree to the procedure described in this privacy statement for the processing and use of your personal data.

#### I. Our Views On Data Protection

The companies of the SGS Group Germany strive to provide most of the services on their respective websites for anonymous use. In this case, anonymous means that personal data of individuals is not collected.

If, however, the storage of your personal data is required, we will store the data only in accordance with the applicable laws or within the framework of a consent issued by you and use this data in accordance with the purpose we have specified and informed you of. Without your explicit consent, SGS Group Germany companies will forward any personal data to third parties, unless SGS is legally bound to do so.

### II. Which Data Do We Collect?

In general, you can use and access all the SGS websites without having to disclose any of your personal information.

You can search our website anonymously to find out about the offers and content on our e-learning platform. If you would like to use our e-learning platform to book courses, we would require personal data from you to process your booking.

When using other SGS websites, however, certain SGS company websites may store one or more of the following types of data in order to offer better products and services and provide you the option to submit an application online:

### 1. Data for personal identification

Personal data is data that makes your identification possible. Personal data is required when you order a service from SGS, create an account, send us feedback, receive a newsletter or submit an application online. Personal data includes specifically the name, date of birth, address (both billing and home address), email address, telephone number and, in certain cases, information on the sector and product and, possibly, a credit card or other means of payment.

### 2. Data without personal identification

Data without identification of the person refers to such data that is merely statistical in nature and on its own does not identify a specific natural or legal person. This data is generated during your visit to SGS company websites and includes, for example, the domain from which you access the SGS company website, the operating system used, the date and time and the IP address from which you access the site.



#### 3. Access to our web pages and cookies

Any access to our web pages and any retrieval of the data stored on these pages is protocolled. This serves internal system-related and statistical purposes. The following information is protocolled: IP addresses of the requesting computers, messages via the web browser and requesting domain, name of the page called up, name of the file retrieved, transferred data volume and date and time of the retrieval. Any additional personal data will only be recorded when you as a user of our websites voluntarily provide information, for example, in the context of an inquiry or registration, or when concluding a contract.

Our web pages use cookies. A cookie is a text file that is sent automatically when you visit a website and is temporarily stored on the hard disk of the Computer of the website user as an anonymous identifier. Cookies facilitate the use of our websites. Cookies serve, for example, to improve the connection to our websites during your visit and provide more effective support when you return to one of our websites. Only the data that a server sends and/or which you enter upon request is stored. Such data includes, for example, information on the domain, path, settings, login dates and expiration date. Cookies contain purely technical information and no personal data. A cookie cannot spy on a hard disk. If you wish, you can generally restrict the storage of cookies via your web browser or decide whether you want to allow storage only with your prior agreement. The refusal of cookies, however, may cause some pages to not display their contents properly.

For more information about cookies, see the SGS Cookie Policy: <a href="https://www.sgsgroup.de/de-de/cookie-policy">https://www.sgsgroup.de/de-de/cookie-policy</a>

### 4. Usage of your data in iPlus

SGS offers e-Learning content worldwide from a single platform. This e-learning platform is provided by the company Seertech Solutions PTY LTD, Level 2, Suite 206, 19a Boundary Street, Rushcutters Bay, 2011, NSW, Australia <a href="www.seertechsolutions.com">www.seertechsolutions.com</a>. The European branch of Seertech Solutions is located at 200 Aldersgate Street, London EC1A 4HD, UK. The data for iPlus e-learning for the region Europe, Middle East and Africa is hosted on a server operated by Equinix, Inc., a US-based company with a European branch located at 80 Cheapside, London, UK <a href="www.equinix.co.uk">www.equinix.co.uk</a>.

Seertech is independently certified in accordance with TRUSTe <a href="https://privacy.truste.com/privacy-seal/Seertech-Solutions/validation?rid=d2b8673b-d834-482e-910a-3f642cee738f">https://privacy.truste.com/privacy-seal/Seertech-Solutions/validation?rid=d2b8673b-d834-482e-910a-3f642cee738f</a> and also participates in the EU-US Privacy Shield Framework and is listed there under <a href="https://www.privacyshield.gov/partici-pant?id=a2zt0000000TNsLAAW&status=Active">https://www.privacyshield.gov/partici-pant?id=a2zt0000000TNsLAAW&status=Active</a>. Equinix is certified according to the following standards: ISO 27001: 2005, ISO 9001: 2008, ISO 14001, OHSAS 18001 and BS 254999-2: 2007, among others.

You can first take a look at the catalog of training courses in iPlus. When doing so, none of your personal data will be stored. If you choose to create a personal account in iPlus, the following personal data will be processed in your account: surname, first name, address, organization/employer and email address. We require this personal data to enable you to participate in SGS e-learning courses and to allow SGS to administer the booked courses and payments and to be able to send you learning materials, notifications and certificates.

In the course of setting up your customer account in iPlus, a cookie from iPlus will be created that will save your login data. This saves you from having to re-enter your login information and settings for iPlus each time you re-enter the page. However, if you wish, you also have the option to refuse the storage of cookies.

All of the courses offered by SGS that you have successfully participated in will be managed in your personal iPlus account. The certificates earned are stored on the iPlus/Equinix server in England and can be retrieved at any time. In the event you wish to delete your personal account, please note that



SGS will keep the certificates for only a limited period of time. Your iPlus E-Learning personal data will not be used for purposes other than those listed here.

## III. What Happens To The Data Collected?

With your prior consent, personal data may be included in our contact and administration databases. This enables us to maintain our relationship with you more efficiently and help us select interesting topics and offers for you and send you the relevant information material.

The evaluation of data without personal identification is common and necessary to ensure the server's operation and to create general access statistics in order to make our offers more user-friendly so that we can meet the desires and needs of our users. This data is not combined with other data sources and is deleted following a statistical evaluation.

### IV. Does SGS Pass On The Data It Receives To Third Parties?

Data about our customers, our applicants or interested parties are an important element in our successful business activities. Therefore, under no circumstances does SGS sell the data it receives to third parties.

Generally, the information you provide to SGS company web pages is collected exclusively in the data-bases of the respective individual SGS company. Only in exceptional cases will it be passed on to other SGS companies. Should this occur, you will be informed prior to the data collection, and you may choose whether or not to expressly agree to the data transfer.

SGS companies pass on the personal data received from you online only in the following cases: When it is necessary to transfer personal data to another SGS company in order to fulfill the purpose for which the information was provided.

- 1. When data is entered on an SGS company website, for example, as part of an application process, this data is forwarded to other SGS companies (also internationally) provided that you explicitly agree to this process.
- Only to the extent necessary when forwarding data to third parties and subcontractors who perform specific tasks on behalf of SGS to enable them to fulfill their tasks within the scope of the storage and use of your personal data as defined by SGS.
- 3. When SGS has a legal obligation to disclose the data. This is the case when government institutions (e.g., law enforcement authorities) ask us for information or when we receive a judicial order to provide this information, or the provision of this information is required to justify or protect legal claims or to defend SGS against legal complaints. Naturally, we protect the confidentiality of your identity.

### V. How Does SGS Protect Your Information?

Your personal data provided to us will be secured using the appropriate technical and organizational measures in such a way that they are inaccessible by unauthorized third parties. Only authorized SGS employees will have access to your personal data.

Personal data will only be passed on to third parties when this is necessary for the performance of a contract concluded with you for an SGS service and/or in individual cases where a legal obligation exists. When service providers are based in the United States and therefore a transfer personal data to the United States is required, we will inform you of the respective purpose for which your data is needed.



SGS company websites may contain links to other websites. SGS has no influence on these sites and therefore does not accept any liability for the privacy policies or content of these other websites.

### **VI. Your Rights**

Naturally, you have the sole right to decide whether, for what period and for what purposes we may use your data. Furthermore, you alone determine whether your data may be passed on to third parties or other SGS companies and whether we may use your data for consulting, advertising and market research purposes. You may revoke this agreement in writing or by email at any time. The revocation should be directed to the mailing address or email address below.

You have the right to receive information about the data stored at SGS that relates to you. You also have the right to correct incorrect data, block data and delete data.

We expressly point out that our employees are obliged to comply with data secrecy in accordance with the German Federal Data Protection Act.

We welcome any of your questions and comments on our privacy statement.

#### How to contact us:

SGS Holding Deutschland B.V. & Co. KG Legal, Compliance & Insurance Rödingsmarkt 16 D-20459 Hamburg t: 040 30101- 0

Our data protection officer is Mr. Thilo Braun. You can contact him directly at the following email address: privacy.de@sgs.com

SGS strives to continually improve its service to customers, applicants and interested parties. This privacy statement is currently valid. To the extent SGS introduces new services, changes its Internet process, further develops its Internet or IT security technology or SGS is required to make an adjustment due to amended legal norms, the updated privacy statement will be published here and will apply from the date of its publication until it is replaced by a successor version.

Current version of statement: May 2018