

**GLOBAL POLICY
PRAMEX INTERNATIONAL INTERNAL RULES
ON GDPR COMPLIANCE**

Introduction

In accordance with European Regulation (2016/679) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, known as the **General Data Protection Regulation** or **GDPR**, the Pramex International Group (the 'Group') has established the following mandatory rules (the '**PI Group Internal Rules**') which are designed to offer appropriate safeguards on the protection of personal data, in particular those of its clients and partners, when those data are transferred from one Group subsidiary located in a EU Member State to another Group subsidiary located outside the European Union.

The PI Group Internal Rules must be applied by all Group entities, irrespective of where they are located, as well as by all employees, in order to guarantee a sufficient level of protection for transfers of data outside the European Union.

Each Group subsidiary has an obligation, inter alia, to comply with internal data protection procedures (procedures, charter etc.), follow the instructions of the Data Protection Officer and participate in training.

Article 1: Definitions

Data Protection Authorities or Organisations, or Supervisory Authority: The CNIL (*Commission Nationale de l'Informatique et des Libertés*) in France, or the equivalent in another country.

Consent of the data subject: Any freely given, specific, informed and unambiguous indication of the data subject's wishes whereby he or she, in the form of a statement or a clear affirmative act, signifies agreement to the processing of personal data relating to him or her.

Data Protection Officer: A natural person from within Pramex International appointed to perform the tasks listed in Article 39 of the GDPR.

Personal data ('Data'): (Article 4(1) of the GDPR) Any information relating to an identified or identifiable natural person ('data subject'). An identifiable natural person is one who can 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.

Subsidiary: Any legal entity of the Pramex International Group, located within or outside the European Union, to which Personal Data may be transferred.

Group: Pramex International SA and its Subsidiaries.

Data Subject: the person who owns the personal data being processed.

Records of Processing Activities or Data Processing Register: A record of processing activities kept by the Data Controller. The record shall contain all the following information:

- The name and contact details of the data controller and, where applicable, the joint controller, the data controller's representative and the data protection officer;
- The purposes of the processing;
- A description of the categories of data subjects and the categories of personal data;
- The categories of recipients to whom the personal data have been or will be disclosed including recipients in third countries or international organisations;
- Where possible, the proposed time limits for erasing the various categories of data.

Data Controller: the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

Data Processor: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the data controller.

Processing: any operation or set of operations which is performed on personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Article 2: Scope

Territorial scope: the PI Group Internal Rules apply to all Data processed within the European Union and transferred outside the European Union, and to all Data Processing performed within the Group.

Material scope: the PI Group Internal Rules cover all transfers of Data between the various Group entities as part of their activities (marketing, production, invoicing using the Group's tools such as CRM, workflows etc.).

Article 3: Principles of personal data protection

3.1 Purpose limitation

The Data must be collected, transferred and processed lawfully, fairly and in a transparent manner, for specified, explicit and legitimate purposes. They may not be further used, transferred or processed in a manner that is incompatible with those initial purposes.

3.2. Data quality and proportionality

The Group entities shall ensure that the Data are:

- accurate and, where necessary, kept up to date,
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are transferred and processed,
- kept in a form which permits identification of Data Subjects for no longer than is necessary for the purposes for which they are collected and processed.

3.3. Legal basis for processing

The Subsidiaries shall ensure that no Data are Processed unless:

- the Data subject has given specific consent; or
- the Processing is necessary for the performance of an agreement to which the Data Subject is party; or
- the Processing is necessary for compliance with a legal obligation to which the Data Controller is subject; or
- the Processing is necessary in order to protect the vital interests of the Data Subject; or
- the Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller; or
- the Processing is necessary for the purposes of the legitimate interests pursued by the Data Controller or by the third party to whom the Data are communicated, except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject.

3.4. Transparency and right to information

Every Data Subject has the right, if their Personal Data are transferred:

- to obtain without undue delay, on request, a copy of these Rules,
- to be informed of the transfer and processing of their Personal Data,
- to access all their Personal Data and, if necessary, correct, erase or limit the further processing of those data, if they are being processed in a manner that contravenes these Rules,

- to object to the Processing of their Data for compelling legitimate reasons relating to their particular situation.

3.5. Security and confidentiality

The Group must protect all Personal Data from unauthorised and accidental access, unlawful Processing, accidental or unlawful communication, loss, destruction and damage. The Group shall therefore implement protective measures, in particular technical, organisational and physical security measures designed to guarantee a suitable level of security and confidentiality for the Personal Data.

These measures will depend on the existing risk, the potential impact for the Data Subject, the sensitivity of the Data, the available technology and the state of the art in the country where the Subsidiary is established.

3.6. Relationships with data processors

The Data Controller shall select Data Processors that are able to provide appropriate guarantees, in the form of technical and organisational measures, on the protection of the processing in their country, and shall enforce those measures.

The Data Processor may only act on instructions from the Data Controller and is solely liable for its security and confidentiality obligations.

3.7. Transfers to external data controllers or processors that are not Subsidiaries

If a Subsidiary is required to use a data processor or another data controller, it shall ensure that:

- the external processor is established in the European Union or a country recognised by the European Commission as offering an adequate level of protection, and is bound by a written agreement stating that the data processor may act solely on the instructions of the data controller and is responsible for guaranteeing adequate security and confidentiality measures.
- All transfers of Data to external data controllers established outside the European Union must comply with regulations, for example by using the EU standard contractual clauses (as approved by Commission decisions 2001/497/EC or 2004/915/EC).

Article 4: Presentation of the PI Group Internal Rules to Group employees and enforcement of those rules

The PI Group Internal Rules shall be presented to every employee of every Group entity (by the Director of each subsidiary to the employees of that subsidiary).

Procedures are in place to enforce the internal rules.

These Rules and the related GDPR procedures are available on the intranet and can be viewed by all Group employees.

The Data Protection Officer is in charge of overseeing compliance and implementation of the PI Group Internal Rules and all related procedures and documentation (records of processing, agreements, etc.).

Article 5: Training programme

In order to ensure a high level of Personal Data protection within the Group, a PI Group Internal Rules training programme is offered to all employees who have permanent or regular access to Personal Data or who develop Personal Data Processing tools.

This training may be given by the Data Protection Officer, by Directors of subsidiaries who have in turn been trained by the Data Protection Officer, or by an external provider.

Article 6: Audits

As part of the enforcement of the PI Group Internal Rules, the Pramex International Group has put together an auditing programme. These audits will either form part of the annual audit schedule established with Pramex International SA's Senior Management or will be conducted unannounced (by the Data Protection Officer or the Data Protection Authority (e.g. CNIL in France)).

The auditing programme covers all aspects of the PI Group Internal Rules, including those that seek to ensure the use of corrective measures.

Every Subsidiary must collaborate with audits of its premises.

The results of audits conducted by the Data Protection Officer are sent to Pramex International SA's Executive Management team. If the audit is carried out by an external provider, the results are sent to the Executive Management team and the Data Protection Officer.

They may also be communicated to the Data Protection Authorities upon request.

Article 7: Internal complaint handling procedure

All complaints relating to Personal Data or to the application of the PI Group Internal Rules by one of the Subsidiaries shall be forwarded immediately to the Director of the subsidiary, who shall in turn immediately inform the Data Protection Officer. The complaint shall be handled by the Data Protection Officer in collaboration with the Director of the subsidiary (a response to the claim must be issued within one month).

Article 8: Internal mechanisms for managing data breaches

Any personal data breach must be reported immediately to the Data Controller, the IT Director at PI SA and the Data Protection Officer so that they may jointly take immediate action (the Supervisory Authority must be notified within 72 hours).

Article 9: Liability

Pramex International SA shall take all measures necessary to remedy any acts committed by Subsidiaries located outside the European Union and governed by the PI Group Internal Rules. Where necessary, it shall compensate any loss resulting from a breach of the PI Group Internal Rules by a Subsidiary. If it is able to prove that the Subsidiary located outside the European Union is not responsible for the breach, it shall not accept any liability.

Article 10: Assistance and cooperation with the Data Protection Authorities

All Subsidiaries shall cooperate with the Data Protection Authorities, in particular in relation to requests or complaints from individuals, or investigations and information requests from the competent authorities.

The Subsidiaries shall comply with and follow all advice received from the Data Protection Authorities.

Article 11: Member State Law and the PI Group Internal Rules

If Member State laws applicable to a Group Subsidiary require a higher degree of data protection than that afforded by the GDPR, the Member State laws shall prevail over the GDPR.

Paris, 30/05/2018

The parties (Pramex International SA and its 13 subsidiaries):

Pramex International S.A. André Lenquette, Chief Executive Officer	Pramex International Italy Jérôme Bonnet, General Manager	Pramex International Germany Guillaume Truchon-Bartès, General Manager
Pramex International UK Jatin Radia, General Manager	Pramex International Poland Marcin Tobor, General Manager	Pramex International Spain Diego Daccarett, General Manager
Pramex International Morocco Hicham Sobhi, General Manager	Pramex International Tunisia Lassaad Ennabli, General Manager	Pramex International US Nicolas Ferry, General Manager
Pramex International Brazil André Borghoff, General Manager	Pramex International India Jérôme Bonnet, General Manager	Pramex International Hong Kong Catherine Song, General Manager
Pramex International Shanghai Catherine Song, General Manager	Pramex International Singapore Christophe Piquée, General Manager	