

CATEGORY:	General note
SUBJECT:	Privacy policy
APROVED BY:	CEO, CFO, HRD SMT Holding
EFFECTIVE:	June 2021 (replaces previous notes on this subject)
TARGET COMPANIES:	SMT Holding

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General

The present document constitutes the privacy policy (the "**Privacy Policy**") of SMT Holding SA¹, with registered office at Triomphe Building, Avenue Arnaud Fraiteur 15-23, Brussels, Belgium, company number 0630.863.452 (hereafter "**SMT**").

This Privacy Policy informs the employees of SMT about how SMT processes the personal data collected or communicated directly from them and / or by other means (e.g. a recruitment agency or their application in the SMT database) because, as part of the employment relationship between SMT and its employees, SMT collects and processes their personal data.

SMT is the controller of the personal data mentioned above and looks after the respect of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of the personal data and on the free movement of such data (the "**GDPR**") or of any other rule of Community law or Member State laws related to the protection of personal data, in particular related to confidentiality and security of data.

SMT reserves the right to adapt this Privacy Policy at any time, the date of the most recent update being indicated at the beginning of this Privacy Policy.

SMT has implemented organizational and technological security measures to prevent personal data from being lost, misused, destroyed or inadvertently changed. All employees of SMT must comply with the security regulations that apply to the entire organization. Personal information is only accessible to authorized SMT employees, and these employees are required to guarantee the confidentiality of this information.

1. Rationale for processing

The processing of employees' personal data is based, depending on the circumstances, on:

- the fulfillment of contractual obligations resulting from the employment contract (article 6.1. b) GDPR);
- the compliance by SMT with one of its legal obligations (article 6.1. c) GDPR);
- the pursuit, by SMT, of its legitimate interests (normal course of SMT's activities and exercise of its role in the context of the employment relationship) (article 6.1. f) GDPR);
- the consent of employees in exceptional circumstances (article 6.1. a) GDPR); and
- the specific hypotheses listed in article 9.2. a), b) and e) GDPR when it comes to sensitive data.

¹ This Privacy Policy supersedes and replaces any provisions relating to the processing of their personal data that may be included in the employment contract (by way of an amendment) of SMT employees, which therefore become ineffective.

2. Categories of data processed

SMT is particularly likely to process the following data relating to employees:

identification data (e.g. surnames, first names, title, address (private and professional), telephone number (private, professional), as well as names and first names of spouses and children, telephone number of a contact person identified by the employee, identifiers (login and password), IP addresses, cookies, etc.); financial details (e.g. identification and bank account numbers); personal characteristics (age, date of birth, sex, place of birth, marital status and nationality) of employees as well as their spouses and children; data related to educational and professional career; data related to employment and remuneration methods; picture, video and images; medical data transmitted in the event of a work accident; etc.

3. Purposes of processing

SMT collects and processes the personal data of its employees in particular for the purposes of:

- manage its staff and meet its legal / contractual obligations both to them (payment of their salary for example) and to the authorities;
- train its staff;
- ensure the safety of SMT (e.g. access control) and its employees (e.g. work accident); and
- inform them of events related to its activities.

4. Recipients

Insofar as this is strictly necessary to achieve the aforementioned purposes, SMT may call on subcontractors (e.g. for IT infrastructures, servers established abroad, digital training platforms, cloud applications for human resources management, etc.) who are required to process the personal data of employees on the instructions of SMT and on its behalf. In addition, SMT may transfer employee data to other group subsidiaries around the world. In these cases, SMT undertakes to take the necessary measures to guarantee the confidentiality of the data and to guarantee their integrity and, when the subcontractors are established outside the EEA, to ensure an adequate level of data protection (for example by signing ad hoc contractual clauses).

If this is provided for by law and / or is justified in the concrete circumstances, SMT may also communicate employees data to law enforcement authorities (e.g. compliance with regulations relating to the protection of privacy and, more broadly, respect for the law (e.g. the police)).

5. Right to withdraw consent

In the exceptional cases where the processing of employees data is based on their consent, they have the option of withdrawing it at any time and free of charge by sending an email to the following address: info.holding@smt.network.

6. Rights of access, rectification, erasure, opposition and portability of their data

In all cases, employees have the right to access their data and to (have) these rectified if they are inaccurate or incomplete, have these deleted and limit or oppose the processing concerning these in the cases provided for by the law. In addition, employees have the right to receive data concerning them in a structured format and to have these transmitted to another company (right to data portability). To exercise the aforementioned rights, employees can send an email free of charge to the following address: info.holding@smt.network.

7. Data retention periods

Employee data will be kept by authorized persons at SMT for the period necessary for the purpose of carrying out the employment relationship and up to 5 years after the end of it, unless their subsequent retention is necessary to respond to legal obligations (particularly in accounting matters).

8. Complaint

Employees can lodge a complaint with the Data Protection Authority (Rue de la Presse, 35 at 1000 Brussels - contact@apd-gba.be).