

NOTICE OF DATA

PRIVACY POLICY FOR EMPLOYEES

Responsible Function:

People & Leadership

Approved by:

President & CEO

Luvata Special Products is required by law to collect and maintain information about its employees. We have a responsibility to safeguard the information in our possession and we are very clear about what is collected and how it is used.

Revision	Revision Date	Author	Approved by	Approved date
1	May 2017	Mikko Juusela	Jussi Helavirta	May 2017

Index

1. Introduction
2. Collection of Information
3. Use of Information
4. Disclosure of Employee Information
5. Transfer of Employee Information
6. Retention of Employee Information
7. Employee Consent
8. Modifications to this Policy
9. Your Rights Regarding your Employee Information
10. Luvata Special Products' Responsibilities Regarding Protecting Employee Information
11. Training and Verification of Privacy Practices
12. Complaints

This document is written and issued as a policy for the guidance of Luvata Special Products employees and also duly appointed third parties in the conduct of assignments or provision of services for Luvata Special Products. It is not to be circulated outside Luvata Special Products, in whole or in part, by any means physical or digital without written permission from the head of the authoring discipline or the approving party noted on the front cover. Luvata Special Products reserves the right to update its policies as necessary and it is the duty of the reader to verify that actions are carried out in accordance with the current version. All contents herein stand in addition to, and not opposing, local and international laws, rights and statutes. Any intellectual property contained herein may be protected by copyrights or trademarks. Questions should be addressed to the authoring discipline before acting under this policy and, as such, Luvata Special Products accepts no responsibility for any consequence of misinterpretation, unauthorized copy or translation, or other such transcription of information herein.

PRIVACY POLICY

1. Introduction

Luvata Special Products and its direct and indirect subsidiaries (collectively, “Luvata”), is required to collect and maintain information about its employees in order to comply with a myriad of governmental and contractual obligations, including providing for the payment of taxes, employee benefits, wages etc. In addition, Luvata collects and maintains information about its employees in order to administer the Luvata Talent Management Process. However, Luvata also recognizes the importance of protecting your privacy and have a responsibility to safeguard the information in our possession and we are very clear about what is collected and how it is used. This Notice of Data Privacy Policy for Employees (this “Policy”) describes, among other things, the information collected by Luvata from its employees and how Luvata uses that information.

2. Collection of Information

In connection with your employment, Luvata may ask you to provide certain information, including, but not limited to, your name, mailing address, telephone numbers, gender, birth date, citizenship, nationality, marital status, name of dependents, birth date of dependents, occupation of dependents and national identification number. Additionally we may maintain information relating to your employment with Luvata including, without limitation, your employee identification number, business unit/division of employment, department, physical work location, job code, compensation rate, supervisor, work shift, hire and termination date, appraisal data and ratings, training, skills, educational background, language proficiency, certifications and licenses and information regarding injuries suffered at work (all information described in this, and the immediately preceding sentence is collectively, “Employee Information”).

3. Use of Information

All information collected will be used for various administrative and record keeping purposes by Luvata and for the purpose to automate the Luvata Talent Management Process, a common global process across the Luvata Group for recruiting, succession planning, career development and performance management (performance management: setting of goals and direction and provide clarity to drive continuous improvements and align the efforts in Luvata followed by an annual feedback and review process to evaluate the goals and performance progress).

4. Disclosure of Employee Information

Employee Information will be disclosed to a limited number of Luvata employees whose job includes maintaining, compiling or otherwise have access to Employee Information.

Luvata may also disclose Employee Information to a third party when it believes, in good faith, that such disclosure is reasonably necessary to comply with any applicable

law or to protect the rights, property, or safety of another person. Additionally, Luvata may disclose Employee Information to a third party employee benefit provider or payroll service or other vendor. Luvata will only disclose Employee Information to a third party when there is a legal base for doing so. If Luvata does disclose information to such a third party, Luvata will ensure that the third party either is subject to the EU Directive on Data Protection (“Directive”), including any subsequent regulation or directive replacing the Directive, or Luvata will enter into a written agreement with such third party which requires the third party to provide at least the same level of privacy protection as is required by the Directive. Lastly, Luvata may transfer or otherwise disclose Employee Information in connection with the sale of its business to a third party.

5. Transfer of Employee Information

Employee Information will be transferred, transmitted, and accessed electronically by a limited number of Luvata employees (as discussed above) at various Luvata locations around the world. Luvata has taken, and will continue to take, appropriate technical and organizational measures to protect all Employee Information from destruction, loss, or unauthorized alteration, destruction, disclosure or access.

6. Retention of Employee Information

Employee Information will only be stored as long as necessary considering the purposes for which it was collected and applicable legal retention periods. When retention period of Employee Information has expired, it will be erased in a permanent and secure way.

7. Employee Consent

Unless you withdraw your consent, in writing, you agree to and accept the proposed collection, maintenance, use, disclosure, and transmission of your Employee Information by Luvata as set forth in this Policy. If any employee objects to Luvata’s collection, use, disclosure, or transmission of certain Employee Information, Luvata will make reasonable efforts to address the concerns of the employee. In no case will an employee be subject to sanction or retaliation for objecting to the collection, use, disclosure or transmission of Employee Information. Any employee who withholds Employee Information or prohibits its collection, use, disclosure, or transmission, however, may be disadvantaged as a result of not making the information available. For example, unwillingness to provide information required to use a service or receive a benefit may make an employee ineligible for that service or benefit.

8. Modifications to this Policy

Luvata may, in its discretion, at any time modify this Policy. Upon modification of this Policy, Luvata will prominently post a revised Policy which describes all intended uses and disclosures of Employee Information within five (5) business days of its adoption and provide each employee with an opportunity to withdraw his or her consent to any new use or disclosure of his or her Employee Information.

9. Your Rights Regarding Your Employee Information

Each employee has the right to:

- Obtain a copy of Luvata's Policy upon request.
- Inspect his or her Employee Information and be able to correct, amend, or delete information where it is inaccurate, except where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy in the case in question, or where the rights of persons other than the individual would be violated. All requests to inspect, correct, amend, or delete information must be submitted in writing to the local Human Resources Manager.
- Withdraw his or her consent to the continued or future use and disclosure of his or her Employee Information, except as to that Employee Information that Luvata determines to be necessary for continued employment.

10. Luvata's Responsibilities Regarding Protecting Employee Information

Luvata is required to:

- Provide employees with notice of this Policy regarding the collection, maintenance, use, disclosure and transmission of Employee Information.
- Ensure that this Policy is current, accurate and comprehensive, prominently displayed, completely implemented, accessible, and conforms to applicable law.
- Abide by the terms of this Policy. In the event that Luvata modifies the terms of this Policy, Luvata will prominently post a revised Policy which describes all intended uses and disclosures of Employee Information, within five (5) business days of its adoption, and provide each employee with an opportunity to withdraw his or her consent to any new use or disclosure of his or her Employee Information.
- Notify the employee if Luvata is unable to agree to the employee's requested restriction on the use or disclosure of his or her Employee Information.
- Take reasonable efforts to validate the accuracy of and to update Employee Information. Maintain the privacy of your Employee Information by taking commercially reasonable precautions to protect the data from loss, unauthorized access, disclosure, alteration and destruction.

The Luvata Company with which you are employed is the data controller in respect of your Employee Information and is, as such, responsible for treating your Employee Information in accordance with applicable law and this Policy.

11. Training and Verification of Privacy Practices

Luvata has provided its employees handling Employee Information with appropriate training to ensure that they are fully aware of their responsibility with respect to data protection. Luvata utilizes internal self-assessment procedures for periodically conducting objective reviews of compliance with the principles of privacy described in this Policy.

12. Complaints

If you believe Luvata has breached its Policy by permitting an unauthorized access, alteration, destruction, use, disclosure, or transmission of your Employee Information, you may contact or file a complaint with your supervisor. If you are not satisfied with the response or action taken by your supervisor, all such complaints and concerns may then be directed to the local Human Resources Manager. Additionally, if you and Luvata cannot, in good faith, resolve any such complaint, Luvata employees located in the EU may also contact their national EU Data Protection authorities or their authorized representatives. You will not be penalized for filing a complaint.