



EMPLOYEE PRIVACY POLICY (ROI)

1. INTRODUCTION

- A. We are committed to protecting and respecting your privacy. This Employee Privacy Policy describes your privacy rights in relation to the information about you that the Company processes as well as the steps we take to protect your privacy.
- B. If you have questions or comments about our administration of your personal information, please contact us at ie.gdpr@lyreco.com. You may also use this address to communicate any concerns you may have regarding compliance with our Employee Privacy Policy.
- C. In this Policy "the Company", "we," "our," and "us" refers to LYRECO IRELAND LTD, and/or its subsidiaries or affiliates.

2. WHAT PERSONAL INFORMATION DO WE COLLECT AND USE?

- 2.1 To run our business, the Company collects and uses information about living people (also known as "personal data"), including information about our prospective, current and former employees and other personnel (together, "Employee(s)", "Personnel" or "you"). For the purposes of this Policy, the data controller is the legal entity which hired you, namely LYRECO IRELAND LTD or any of its affiliates or subsidiaries.
- 2.2 In relation to prospective, current and former employees we collect basic identification information, such as your name, title, position, professional history, experience, contact details for you and, where relevant, your family.
- 2.3 For current employees, we also collect:
 - 2.3.1 Information regarding personal details (e.g. name, position, title, office location, business telephone number, date and place of birth, picture, ID card, passport numbers and other national ID numbers as required, employment identification number, private email and/or postal address, country, and car registration number);
 - 2.3.2 Electronic identification data (e.g. login information, access right, badge number, IP address, online identifiers/cookies, logs and connection time, sound or image recording such as CCTV or voice recordings);
 - 2.3.3 Personal and physical characteristics (e.g. gender, date of birth, immigration status, and physical characteristics);
 - 2.3.4 Family information (e.g. marital status, marriage certificate and number of children, contacts in case of an emergency);
 - 2.3.5 Education and employment information (e.g. salary and social benefits, bonus, pension entitlements, insurance and other benefits information, employment dates such as dates of hiring/promotion/position change, performance evaluation, position information such as position title and reference number, attendance information including, where relevant, illness or leaves of absence for medical or other reasons, language skills, and training, education and development information);
 - 2.3.6 National registry number, social security number or local equivalent;
 - 2.3.7 Financial information (e.g. bank account details, professional credit card numbers, tax-related information and, where relevant, information relating to account transactions and dealings); and
 - 2.3.8 where relevant, information about how employees may use IT systems and hardware, records of phone calls and other personal data that may be processed as a result of the monitoring of the Employees carried out in accordance with applicable regulations in force at the Company's relevant policies.

- 2.3.9 In some cases, the personal data that we collect will also include 'special categories of data', such as diversity related information (including data about racial and ethnic origin, political opinions, religious beliefs and other beliefs of a similar nature, trade union membership and data about sexual life and sexual orientation), drugs/alcohol test results/data or health data (such as sickness records, disability records, fitness for work and health insurance where it contains data relating to sickness) and data about alleged or proven criminal offenses in each case where permitted by law.
- 2.3.10 The Company will also collect personal data indirectly from third parties, such as from recruitment agencies that you used to move to the company, other Company's affiliates, if you were transferred to us from such entities, background check providers and other administration services providers such as drugs and alcohol testing provider, other employees in any complaints or disciplinary reports submitted about you, or from professional publicly available sources (e.g. LinkedIn).
- 2.3.11 The Company may capture personal data in the form of images, video or audio recording of employees individually or as part of a small group for employee engagement activities targeted to existing or prospective employees, industry bodies, or customers.
- 2.3.12 Video recording may be captured by CCTV in areas clearly outlined within and around our offices or distribution centres. These areas are clearly sign posted that that security surveillance is in operation.

3. WHAT DO WE USE THAT INFORMATION FOR?

We process personal data of Employees to:

- 3.1 carry out recruitment activities (including internal hires and secondments) within the Company;
- 3.2 administer, plan and manage our personnel (including task, benefits and absence management, arranging business travels, succession planning staff turnover, internal workforce analysis and planning, the collection of social and trade union membership fees, issuing tax declaration forms and filing the related data, and Employee participation programs);
- 3.3 implement tasks and plan activities in preparation of or under existing contracts;
- 3.4 train our Employees;
- 3.5 manage our payroll, bonus and compensation schemes, and further bookkeeping obligations;
- 3.6 manage our People & Culture records and update the Company's personnel databases;
- 3.7 carry out Employees' performance reviews or satisfaction surveys;
- 3.8 monitor our Employees' activities in the workplace, in accordance with applicable regulations, and internal policies as well as health and safety rules in place;
- 3.9 manage our IT resources, including infrastructure management and business continuity;
- 3.10 manage any disciplinary action;
- 3.11 reply to an official request from a public or judicial authority with the necessary authorisation;
- 3.12 justify conformity of the company towards social legislation in some RFP answers.



EMPLOYEE PRIVACY POLICY (ROI)

- 3.13 inform Employees of internal events and leisure activities organized by the Company;
- 3.14 comply with any legal obligations imposed on the Company in relation to its Employees; and
- 3.15 to enable a transfer to a potential buyer, transferee, merger partner or seller and their advisers (such as our lawyers, auditors, accountants) in connection with an actual or potential transfer or merger of part or all of the Company's business or assets, or any associated rights or interests, or to acquire a business or enter into a merger with it.
- 3.16 to enhance employee communication through the use of imagery and voices of identifiable team members and demonstrate our workplace culture to prospective employees, industry bodies for award submissions, reports, or case studies, and customers as part of our contract bid process.
- 3.17 To monitor and measure security and adherence to safety guidelines.

4. WHAT DATA SECURITY MEASURES HAVE WE PUT IN PLACE?

- 4.1 Your computer related Personal Data (e.g. username, installed software, IP address, computer name, location, etc.) for the purposes of tracking and managing computing assets such as software licensing and hardware systems, installation of additional software applications, etc. to the extent necessary for the purposes below:
 - 4.1.1 intrusion detection, system protection, monitoring and logging;
 - 4.1.2 providing helpdesk services, including error reports and treatments as well as processing IT-related issues and problems; and
 - 4.1.3 preventing unauthorized third parties from accessing our sites and our information system.
- 4.2 The Company only collects "sensitive" personal information when the relevant individuals voluntarily provide us with this information or where such information is required or permitted to be collected by law.

5. ON WHAT LAWFUL BASIS DO WE PROCESS YOUR PERSONAL INFORMATION?

- 5.1 Applicable data privacy regulations allow us to process personal data, so long as we have a lawful basis or "ground" to do so. As a result, when we process your personal data we will rely on one of the following lawful basis:
 - 5.1.1 Performance of a contract: this is when the processing of your personal information is necessary to perform our obligations under a contract;
 - 5.1.2 Legal obligation: this is when we are required to process your personal information to comply with a legal obligation, such as keeping records for tax purposes or providing information to a public body or law enforcement agency;
 - 5.1.3 Legitimate interests: we will process information about you where it is in our legitimate interest in running a lawful business to do so to further that business, so long as it doesn't outweigh your interests;

- 5.1.4 Vital interests: the processing is necessary to protect the vital interests of the relevant individual or of another natural person, such as providing disability access to places of work where applicable;
 - 5.1.5 Public Interest: the processing is necessary for the performance of a task carried out in the public interest; or
 - 5.1.6 Your consent: in some cases, we will ask you for specific permission to process some of your personal information, and we will only process your personal information in this way if you agree to us doing so. You may withdraw your consent at any time by contacting the Company at ie.qdpr@lyreco.com (this legal basis is not used for processing operations which are necessary or mandatory, such as human resource or payroll management).
- 5.2 Examples of the 'legitimate interests' referred to above are:
- 5.2.1 To prevent fraud or criminal activity and to safeguard our IT systems, assets and places of work.
 - 5.2.2 To meet our corporate and social responsibility obligations and establish a unified human resources management policy.
 - 5.2.3 To exercise our fundamental rights in the EU under Articles 16 and 17 of the Charter of Fundamental Rights, including our freedom to conduct a business and right to property.
 - 5.2.4 To provide a centralized and global approach to the provision of IT services to our Employees, and enable staff working for the Company to interact with one another. This normally involves the hosting of your contact and e-mail information to allow the Company's global IT network to be established and populated with relevant and accurate details.

6. DO WE PROCESS INFORMATION ABOUT YOU WITHOUT ANY HUMAN INTERVENTION AT ALL?

Yes, we do. The Company uses automated systems/processes and automated decision-making (like profiling) to provide you with the services you request from us. For example, if there is a change in a law or regulation affecting a specific demographic, such as disabled Employees, we may conduct a search of our personnel database using automated criteria to compile a list of Employees to whom information about the update should be sent.

7. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION FOR?

We retain your personal information only for the minimum period necessary for the purposes set out in this Privacy Policy and notably for so long as the information is necessary to comply with our obligations to our prospective Employees and Employees, and necessary to comply with legal or internal policy requirements.



8. DO WE TRANSFER YOUR PERSONAL INFORMATION WITHIN THE LYRECO GROUP?

We share information about you within the Lyreco Group as part of international engagements, to meet our legal and regulatory obligations around the world. Other parts of the Company's network are also used to provide services to us and you, for example hosting and supporting IT applications.

9. DO WE TRANSFER YOUR PERSONAL INFORMATION TO THIRD PARTIES?

9.1 We do not share personal information with third parties, except as necessary for our legitimate professional and business needs, to carry out your requests, and/or as required or permitted by law. This would include:

9.1.1 Our service providers: We transfer your personal information to our third-party service providers, such as our (IT) systems providers, our hosting providers, our payroll providers, consultants (such as legal advisers) and other goods and services providers. The Company work with such providers so they can process your personal information on our behalf.

The Company will only transfer personal information to them when they meet our strict standards on the processing of data and security. We only share personal information that allows them to provide their services.

9.1.2 If we are reorganized or sold to another legal entity: the Company will typically also disclose personal information in connection with the sale, assignment, or other transfer of the business to which the data relates.

9.1.3 Courts, tribunals, law enforcement or regulatory bodies and other authorized third parties: the Company will disclose personal information in order to respond to requests of courts, tribunals, government or law enforcement agencies or where it is necessary to comply with applicable laws, court or tribunal orders or rules, or government regulations. We also communicate documents (such as payrolls, social declarations...) containing your personal information to authorized third parties such as our professional accountants or lawyers.

9.1.4 Audits: disclosures of personal information will also be needed for data privacy or security audits and/or to investigate or respond to a complaint or security threat.

9.2 If we engage a third party 'processor' (within the meaning set forth in applicable data privacy regulations) to process your personal information, the processor will be subject to binding contractual obligations to: (a) only process your personal information in accordance with our instructions; and (b) use measures to protect the confidentiality and security of your personal information.

10. DO WE TRANSFER YOUR INFORMATION TO COUNTRIES WHICH DO NOT PROVIDE AN ADEQUATE LEVEL OF PROTECTION?

10.1 Countries which do provide an adequate level of protection are those listed https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en.



- 10.2 The Company will transfer certain personal information to external companies working with us or on our behalf for the purposes described in this Privacy Statement. We typically send or store personal information to countries in which Lyreco SAS or a Lyreco subsidiary are located.
- 10.3 If we do this your personal information will continue to be protected by means of contracts we have in place with those entities located in countries which do not provide an adequate level of protection, containing standard data protection clauses which are in a form approved by the European Commission if we are legally required to take appropriate safeguards pursuant to applicable data privacy regulations.

11. WHAT ARE YOUR RIGHTS?

- 11.1 If the Company processes personal information about you, you have the following rights:
 - 11.1.1 Access: you have the right to access to your data. We will provide it to you free of charge. Before providing personal information to you, we may ask for proof of identity and sufficient information about your interactions with us that we can locate your personal information.
 - 11.1.2 Correction: If the information we hold about you is incorrect, you are entitled to ask us to correct any inaccuracies in the personal information and we undertake to proceed with such corrections.
 - 11.1.3 Object to processing: you have the right to object to us processing your personal information if we are not entitled to use it any more or if we have no legitimate interest to pursue such or such data processing.
 - 11.1.4 Other Rights: in addition, you may have rights to have your information deleted if we are keeping it for too long, have its processing restricted in certain circumstances and/or to obtain copies of information we hold about you in electronic form.
- 11.2 You can make a request or exercise these rights by contacting the Company ie.gdpr@lyreco.com and we will make all reasonable and practical efforts to comply with your request, so long as it is consistent with applicable law.
- 11.3 Finally, you always have the right to lodge a complaint with the regulator in charge of protecting personal information in your country in case of a dispute with us regarding the processing of your personal data by the Company.

12. CONTACT US

If you have any questions or concerns regarding this privacy information statement would like further information about how we protect your information and/or when you want to contact the Company's Data Protection Officer (DPO), please email us ie.gdpr@lyreco.com



EMPLOYEE PRIVACY POLICY (ROI)

13. CHANGES TO THIS EMPLOYEE PRIVACY POLICY

The Company may modify this Employee Privacy Policy from time to time to reflect our current privacy practices. When we make changes to this statement, we will revise the "Last Reviewed" date at the bottom of this page and any changes affecting you will be communicated to you through an appropriate channel, depending on how we normally communicate with you.