

Privacy Policy Whistleblowing

公司内部举报的隐私政策

Pursuant any local data protection applicable laws and any other local whistleblowing applicable laws (collectively referred as "Applicable Legislation") in relation to the management of reports made by you through the internal Whistleblowing portal, we inform you that any information and personal data as defined in Applicable Legislation (hereinafter "Personal Data") voluntarily provided through the aforementioned channel will be processed by Reichhold Polymers (Tianjin) Ltd. as Data Controller of Personal Data (the "Data Controller") in accordance with the Applicable Legislation.

根据与您通过内部举报门户网站进行的举报管理相关的任何适用的当地数据保护法律和任何适用的其他当地举报法律（统称为“适用法律”），我们通知您，通过上述渠道自愿提供的任何适用法律中定义的信息和个人数据（以下简称“个人数据”）将由 Reichhold Polymers (Tianjin) Ltd. 作为个人资料的数据控制人（“数据控制人”）进行处理。

1. Purpose and legal basis of data processing

数据处理的目的和法律依据

Personal Data are processed for the management of internal reports of alleged violations, or conduct, acts or omissions that harm the public interest or the integrity of the private entity, of which the reporting person has become aware due to his or her collaboration/relationship with the Data Controller. The Personal Data processed are those contained in the internal report, and/or in acts and documents attached to it that refer to the reporting person and any other person involved.

处理个人数据的目的是管理内部报告，报告人因与数据控制人的合作/关系而知道的被指控的违规行为或损害公共利益或私人实体诚信的行为、行动或不作为。所处理的个人数据是指内部报告和/或其所附的涉及报告人和任何其他相关人员的行为和文件中所载的个人数据。

Personal Data may also be processed to carry out the necessary investigative activities aimed at verifying the validity of what has been reported, as well as, if necessary, for the adoption of appropriate corrective measures and the introduction of appropriate disciplinary and/or judicial actions against those responsible for the violations. The legal basis that legitimizes the processing of Personal Data is represented by the fulfilment of a legal obligation to which the Data Controller is subject. The processing may also concern particular data and personal data relating to criminal convictions and offences if included in the report.

处理个人数据还可能用于开展必要的调查活动，目的是核实所举报内容的有效性，以及在必要时采取适当的纠正措施，并对违规责任人采取适当的纪律和/或司法行动。使个人数据处理合法化的法律依据是数据控制人所承担的法律义务的履行。处理还可能涉及与刑事定罪和罪行有关的特定数据和个人数据（如果包括在报告中）。

2. Data processing methods and retention time criteria

数据处理方法和保留时间标准

Personal Data will be processed by Data Controller through 1) the reporting form provided by the Data Controller or 2) through a Whistleblowing portal supplied by a third party, managed remotely, manually and using IT instruments accessible solely and exclusively by personnel appropriately authorized by the Data Controller through the grant of specific authorization to perform the data processing. For the purposes of point 2) above, We hereby inform you that pursuant to Applicable Legislation we appointed Polynt S.p.A as Data Processor for providing services related to the Whistleblowing portal: in this view, Polynt SpA has appointed as its Data Processor InsiderLog AB, a well-known company, specialized in supplying information platform for data collection that in the execution of its obligations guarantees an adequate level of security and confidentiality of the Personal Data.

数据控制人将通过以下方式处理个人数据：1) 数据控制人提供的报告表格，或 2) 通过第三方提供的举报门户，使用 IT 工具进行远程、手动管理，且只能由数据控制人通过授予执行数据处理的特定授权而获得适当授权的人员访问。为上述第 2) 点的目的，我们特此通知您，根据适用法律，我们已指定 Polynt S.p.A 为数据处理方，提供与举报门户网站相关的服务：鉴于此，Polynt S.p.A 已指定 InsiderLog AB 作为其数据处理方，该公司是一家知名公司，专门为数据收集提供信息平台，在履行其义务时保证个人数据的足够安全性和保密性。

We inform you that there are two ways to submit the report: anonymous or identified manner.

我们通知您有两种方式提交报告：匿名方式或身份证明方式。

In the first case, the registration of reports in the Whistleblowing system is also anonymous. The only data that is recorded is the report itself. No logs are traced for the IP address or ID of the computer from which the report is originated.

在第一种情况下，举报系统中的举报登记也是匿名的，唯一被记录的数据是报告本身。不会追踪日志以获取报告来源的计算机的 IP 地址或 ID。

The Data Controller guarantees that your rights regarding the protection of Personal Data will be respected without limitation and will only be used as described in this policy.

数据控制人保证，您在个人数据保护方面的权利将不受限制地受到尊重，且个人数据将仅按本政策所述的方式进行使用。

The Data Controller will not share your personal information with third parties outside the organization except in the cases described below in the "Transfer and Disclosure of Personal Data" section.

数据控制人不会与组织以外的第三方共享您的个人信息，但以下“个人数据的传输和通信”部分所述的情况除外。

In the event of identified reports, all subjects who use the reporting form or the Whistleblowing portal agree to process their Personal Data for the purposes indicated in this policy.

在实名举报的情况下，使用举报表格或举报门户网站的所有主体同意根据本政策所述的目的处理其个人数据。

All Personal Data (including the identity of the whistleblower and all other data provided) will remain strictly confidential and will not be shared with third parties outside the Data Controller's organization, including for the purpose of carrying out investigations related to the report (except in the cases described in the "Transfer and Disclosure of Personal Data" section). In particular, whistleblowing reports as well as the information and Personal Data included therein will be processed by the Internal Auditor and/or the Group General Counsel/Group Director HR/IT, ("Directive Committee") both subjects specifically and internally appointed by the Data Controller pursuant to the Applicable Regulations. The Directive Committee may share the report and any other Personal Data contained therein to your local General Manager.

所有个人数据（包括举报人的身份和所提供的所有其他数据）将严格保密，不会与数据控制者组织以外的第三方共享，包括为开展与报告相关的调查而共享（“个人数据的传输和通信”部分所述的情况除外）。特别是，举报报告以及其中包含的信息和个人数据将由内部审计员和/或集团总法律顾问/集团人力资源/IT 导演（“指令委员会”）处理，双方均由数据控制人根据适用法律内部特别任命。指令委员会可能会将报告及其中包含的任何其他个人数据分享给您当地的总经理。

If necessary for investigations, the whistleblowing report may be submitted to other individuals/employees who need to be involved in the investigations and who will be duly authorized to process the Personal Data contained therein. If necessary, the Data Controller will request your consent to disclose your identity to such individuals/employees.

如调查需要，举报报告可能会提交给其他需要参与调查的个人/雇员，他们将被正式授权处理其中包含的个人资料。如有必要，数据控制人将请求您同意向此类个人/员工披露您的身

份。

In order to comply with legal obligations or in the event of legal proceedings following the analysis of the report, the Data Controller must disclose the identity of the reporting party.

为了履行法律义务，或在分析报告后发生法律诉讼时，数据控制人必须披露报告方的身份。

Personal Data will be processed for the period strictly and objectively necessary to achieve the scope and purposes identified in paragraph 1 above. In the event that the Personal Data is no longer required, the Data Controller will securely delete or anonymize the Personal Data. In any case, the Personal Data will be kept for a period not exceeding 5 (five) years from the notification of the final decision on the whistleblowing report and, subsequently, will be permanently deleted.

为达到上文第 1 段所述的范围和目的，个人数据将在严格和客观必要的期限内处理。在不再需要个人数据的情况下，数据控制人将安全地删除个人数据或对个人数据进行匿名化处理。在任何情况下，个人数据将被保存不超过五（5）年，从对举报报告的最终决定通知之日起，随后将被永久删除。

3. Transfer and Disclosure of Personal Data

个人资料的转移及披露

The content of the report may be shared or disclosed to other companies of Reichhold Polymers (Tianjin) Ltd. (affiliates, subsidiaries, etc.) that may process Personal Data as independent data controllers. All of these entities are bound by intercompany agreements entered into for this purpose.

报告内容可能会被共享或披露给可能作为独立数据控制人处理个人数据的 Reichhold Polymers (Tianjin) Ltd. 的其他公司（关联公司、子公司等）。所有这些实体都受为此目的而签订的公司间协议的约束。

In the event of a possible legal proceeding or if the Data Controller needs specific advice to analyze and better understand the content of the report, it may share the Personal Data with its legal advisors or competent authorities, duly authorized to process Personal Data.

在可能发生法律诉讼的情况下，或者如果数据控制人需要具体建议以分析和更好地理解报告内容，则可以与其法律顾问或经正式授权处理个人数据的主管机构共享个人数据。

In general, Personal Data will be stored and processed within the European Union (EU)/European Economic Area (EEA) or any other non-EEA country that the European Commission deems to offer an adequate level of protection (so-called "white-listed" countries). In the event that it is necessary to transfer Personal Data to a non-EEA country that the European Commission does not consider offering an adequate level of protection, we will implement appropriate security measures and safeguards, including the applicable Standard Contractual Clauses adopted by the European Commission.

一般而言，个人数据将在欧盟（EU）/欧洲经济区（EEA）或欧盟委员会认为提供足够保护水平的任何其他非欧洲经济区国家（所谓的“白名单”国家）内存储和处理。如果有必要将个人数据传输到欧盟委员会认为未提供足够保护水平的非欧洲经济区国家，我们将实施适当的安全措施和保障措施，包括欧盟委员会采用的适当的标准合同条款。

We hereby inform you that the Data Controller implements all possible and reasonable security measures during the collection and processing of your Personal Data but declines any responsibility for the security of your data during its transit in the web unless the Data Controller's liability explicitly derives from a legal obligation.

我们特此通知您，数据控制人在收集和处理您的个人数据期间实施了所有可能和合理的安全措施，但对您的数据在网络上传输期间的安全不承担任何责任，除非数据控制人的责任明确源自法律义务。

Notwithstanding the above, we inform you that the person against whom the report refers will not

have access to the identity of the reporting party but may have access to the content of the report itself.

尽管有上述规定，我们告知您，报告所指的是人将无法获知报告人的身份，但可以获知报告本身的内容。

4. Your rights

您的权利

As a reporting party/data subject (to whom the Personal Data refers), you are the owner of the rights conferred by Applicable Legislation. In particular, data subjects have the right to request and obtain, at any time, access to their Personal Data, information on the processing carried out, rectification and/or updating of Personal Data, cancellation and limitation of processing. You also have the right to object to processing and to request data portability (*i.e. to receive your personal data in a structured, commonly used and machine-readable format, with the exception of personal data that may be essential for us to comply with legal obligations*). Finally, data subjects always have the right to withdraw their consent at any time (this, in any case, will not affect the lawfulness of the processing carried out on the basis of the consent given before its withdrawal) and to lodge a complaint with the competent data protection authority.

作为报告方/资料当事人（个人资料所指者），您是适用法律所赋予权利的拥有人。特别是，数据主体有权在任何时候要求并得以访问其个人数据、获得有关所进行的处理、更正和/或更新个人数据、取消和限制处理的信息。您也有权反对处理并要求数据的可携带性（即以结构化、常用和机器可读的格式接收您的个人数据，但我们履行法律义务所必需的个人数据除外）。最后，数据主体始终有权随时撤回其同意（在任何情况下，这都不会影响在撤回同意之前基于同意进行的处理的合法性），并向主管数据保护机构提出申诉。

Requests relating to the exercise of the above rights should be sent to the following e-mail address: privacy@polynt.com.

有关行使上述权利的请求应发送至以下电子邮件地址：privacy@polynt.com。

To the same address indicated above, the interested party must also send requests relating to the recipients of Personal Data, as well as requests for clarification regarding this privacy policy.

利害关系方还必须向上述相同地址发送有关个人数据接收者的请求，以及澄清本隐私政策的请求。