

SEKISUI PRODUCTS, LLC CLIENT DATA PROTECTION NOTICE

Sekisui Products, LLC (“Sekisui”) greatly appreciates the opportunity to work with you. We value your trust and strive continually to justify that trust.

As you likely will have heard, the General Data Protection Regulation (“GDPR”) is effective from May 25, 2018, bringing with it new requirements for the handling of personal data, including personal data of the Sekisui’s clients like you. Sekisui is committed to protecting the privacy and security of your personal information. This data protection notice describes how we collect and use personal information about you and individuals affiliated with you prior to, during, and after your client relationship with us. It applies to all prospective and current clients. As updated from time to time, this notice will continue to apply after our work for you concludes. With respect to certain individuals in the European Union, the Sekisui may be considered a data controller under applicable data protection laws as they may vary from time to time, including the General Data Protection Regulation (Regulation (EU) 2016/679) (“Data Protection Laws”). This means that we are responsible for deciding how we hold and use personal information about you. We are providing this notice pursuant to the Data Protection Laws. This notice does not form part of any contract to provide legal services. We may update this notice at any time.

Terms used in this notice

In this notice, Personal Data means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, 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 physical, psychological, genetic, mental, economic, cultural or social identity of that natural person.

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

restriction, erasure or destruction, and Process and Processed shall be construed accordingly. Sensitive Personal Data means information that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health and data concerning a natural person’s sex life or sexual orientation.

The Personal Data that the Sekisui collects

Depending on the requirements of a particular matter, the Sekisui may receive the following Personal Data about you, which includes Sensitive Personal Data:

- Your name;
- Your contact details (e.g. postal address, email address, telephone number, mobile number);
- Your date of birth;
- Your gender;
- Your race or ethnicity;
- Your nationality;
- Your bank details;
- Your governmental identification numbers;
- Information relating to your health;
- Information relating to your insurance;
- Information relating to your taxes;
- Your educational history and qualifications;
- Your employment history;
- Information relating to your employment and work performance;
- Information relating to your travel arrangements;
- Your passport and visa details;
- Premises security information, which may include access logs and CCTV footage;
- Photographs; and
- Information relating to your family; and
- Other information relating to the matters in which the Sekisui acts for you.

In addition to Personal Data that you provide to the Sekisui, the Sekisui may obtain Personal Data about you from others, including third-party databases in the course of performing required checks such as anti-money laundering or sanctions checks. Depending on the circumstances of a particular matter, we also may obtain Personal Data from other parties in connection with our work on your behalf.

Why the Sekisui uses your Personal Data

The legal basis that the Sekisui relies upon for Processing your Personal Data, whether such Processing occurs before, during or after your relationship with the Sekisui, will fall into one of the following categories:

- (a) the performance of any of the Sekisui's obligations under your engagement with the Sekisui as well as the Sekisui's policies or legal obligations (including Anti-Money Laundering and sanctions checks);
- (b) the legitimate interests of the Sekisui, including checks necessary to protect the Sekisui's financial position; and
- (c) where applicable, your provision of consent for the Sekisui to Process your Personal Data in a certain way.

The legal basis that the Sekisui relies upon for Processing your Sensitive Personal Data, whether such Processing occurs before, during or after your relationship with the Sekisui, will fall into one of the following categories:

- (a) where the Processing is necessary to comply with the Sekisui's legal obligations;
- (b) where the Processing is necessary for reasons of substantial public interest;
- (c) where the Processing is necessary for the establishment, exercise or defense of legal claims; and
- (d) where you have provided explicit consent for the Sekisui to use your Sensitive Personal Data in a certain way.

The Sekisui does not require consent to use Sensitive Personal Data in order to carry out its legal obligations. In limited circumstances, the Sekisui may approach you for your written consent to allow it to Process Sensitive Personal Data; if the Sekisui does this, it will provide you with full details of the information it would like to use and the reason for such use, so that you can consider whether you wish to consent. In situations involving personal data relating to children under the age of 16 (or a lower age if permitted by the Data Protection Laws), the Sekisui will seek parental consent.

The Sekisui may use your Personal Data, including Sensitive Personal Data, for the following purposes:

- (a) administering arrangements concerning your client relationship with the Sekisui;
- (b) carrying out checks prior to or during the course of your relationship with the Sekisui, such as Anti-Money Laundering or sanctions checks;
- (c) conducting the Sekisui's ongoing business;
- (d) processing any payments received on your behalf, including any legal obligations relating to such payments; and

- (e) providing you and your representatives with marketing information about the Sekisui and our services.

We will not Process your Personal Data, or Sensitive Personal Data, for any other purposes incompatible with the purposes mentioned above.

If you fail to provide Personal Data

If you fail to provide certain Personal Data when requested, the Sekisui may not be able to perform the services that it has agreed to provide for you, or may be prevented from complying with our legal obligations (such as running required checks).

With whom the Sekisui will share your Personal Data

The Sekisui will not sell your Personal Data to third parties.

The Sekisui may sometimes share your information with its trusted service providers and other third parties who perform services and functions on the Sekisui's behalf to support its interactions with you, including for example technology providers, disclosure and discovery vendors, experts, and consultants.

The Sekisui may also have to disclose your Personal Data to comply with a legal obligation imposed on it.

From time to time, the Sekisui may disclose your Personal Data to organizations for the purposes of fraud and credit risk reduction. The Sekisui may also share your Personal Data with its legal advisers for the purposes of obtaining advice and the protection of its legal rights

Where the Sekisui stores your Personal Data and how it secures your Personal Data

Data received by the Sekisui may be transmitted to, processed in, and stored in the United States. Accordingly, your Personal Data may be stored and processed outside of the European Economic Area. Where this is the case, the Sekisui will have adequate safeguards in place to ensure the security of your Personal Data. To safeguard your Personal Data, the Sekisui maintains appropriate physical, electronic and procedural safeguards. However, please note that the transmission of information via the internet is not completely secure. Although the Sekisui will do its best to protect your Personal Data, it cannot guarantee the security of any such Personal Data transmitted via the internet.

How long will the Sekisui keep your Personal Data?

The Sekisui will retain your Personal Data for seven years following the conclusion of your matter. After that time, unless the Sekisui has an ongoing basis to maintain that information, the Sekisui will delete your Personal Data from its systems and notify any third parties to whom it transferred your Personal Data of the need to delete that data.

Your rights

You have a number of rights under the Data Protection Laws, including the right to:

- Access a copy of the Personal Data that the Sekisui holds about you;
- Rectify inaccuracies in Personal Data that the Sekisui holds about you;
- Have the Personal Data that the Sekisui holds about you erased in certain circumstances;
- Restrict the Processing of your Personal Data in certain circumstances;
- Object to the Processing of your Personal Data in certain circumstances;
- Transfer the Personal Data that the Sekisui holds about you to another entity in certain circumstances; and
- Withdraw any consent you have provided.

If you would like to invoke any of those rights, please inform dataprotection@sekisuiproducts.com.

Complaints

If you have a complaint about the way the Sekisui is using your Personal Data then initially you should contact dataprotection@sekisuiproducts.com.