HOLCIM PRIVACY POLICY

Last updated: October 2023

Holcim Ltd and its subsidiaries, including Holcim Belgium, (collectively referred to as 'Holcim' or 'we') undertake to protect your personal data and to be transparent about how your personal data is processed. As a general rule, the subsidiary of Holcim, operating in the country where you are located, acts as the controller, responsible for processing your personal data. The contact details of each Holcim subsidiary in the European Union are available at https://www.holcim.com/directory.

We take the utmost care to process your personal data in accordance with the principles set out in the data protection legislation applicable in the countries where Holcim operates, including Regulation (EU) 2016/679 on protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation).

This Privacy Policy covers the personal data of the following categories of individuals:

- customers or potential customers;
- representatives or contact persons of customers or potential customers of Holcim.
- suppliers and subcontractors and other business partners;
- representatives or contact persons of suppliers, subcontractors and other business partners of Holcim;
- applicants;
- participants in education and community partnerships;
- workers, contractors and workforces;
- family members and dependants of employees, contractors and labourers;
- former employees, contractors and workers;
- shareholders, company directors and authorised persons;
- education and community partnerships;

- participants in events
- journalists and media representatives
- visitors to our buildings;
- users of our Internet websites;
- general public.

This Privacy Policy is intended to provide details of all the processing activities we do; therefore, the Privacy Policy is structured based on the type of collaboration or interaction you have with Holcim. This means that not all the sections, nor the processing purposes in this Privacy Policy will be relevant to everyone.

This Privacy Policy defines:

- the purposes for which we collect and process your personal data;
- the processing grounds for such purposes;
- the categories of personal data we collect from you and the sources from which they;
- Whether the provision of your personal data is necessary and the possible consequences of your refusal to provide such data;
- To whom we disclose or may disclose your personal data;
- The countries to which we transfer your personal data;
- the processing time of such data;
- your rights as a data subject and how to exercise them.

I. DOELEINDEN, VERWERKINGSGRONDEN EN CATEGORIEËN VAN PERSOONSGEGEVENS

In the context of your interaction with Holcim, you, as a natural, may be involved in the data processing activities we do. For example, we use your personal data in the following cases:

1. Indien u een klant of potentiële klant van Holcim bent

Activity	Purposes	Categories of personal data and sources	Processing grounds
Customer research procedures and reporting	We process your personal data to conduct customer research prior to our contractual relationship. This may include, if and to the extent required or permitted by , anti-money laundering, anti-bribery, anti-corruption and other similar checks. We conduct such customer research to ensure that the collaboration with you is appropriate and that potential risks are determined and managed before entering into the contractual relationship with you.	Name, e-mail, phone, fax, address, data resulting from the customer survey and other personal data you would provide us directly, necessary to achieve this purpose. Some of this personal data is collected from other sources and not directly from you, respectively from our service providers, business partners and publicly available sources.	Depending on the jurisdiction where the processing is done, the processing is either required: • to comply with a legal obligation we have to fulfil or • to pursue our legitimate interests and take the necessary measures to protect our business, namely to maintain and develop our business activity. In the event that certain personal data have a special regime under data protection laws, we will process such data to the extent that one or more guarantees prescribed by the laws relating to the processing of such data of apply.

Provide the services you have requested	We process your personal data for the following purposes:	Name, e-mail, telephone, fax, address and other personal data you would give us directly	we rely on the performance of the agreement.
	 negotiating the terms of the contractual relationship with you and concluding the agreement; Provide the services requested by you and manage aspects that follow from our contractual relationship; communicate with you in relation to any aspect concerning the services you have requested (e.g. providing you with pricing information, delivering the products purchased, managing and promoting cooperation and preparing invoices); promote the payment of goods and services; 	deliver, necessary to achieve this .	

Customer administration	We process your personal data for customer administration purposes, namely to: • Create, manage and maintain a Customer Relationship Management (CRM) database, including relevant organisation charts; • keep records of our customers, such as reports of meetings and other notes;	Name, e-mail, telephone, fax, address and other personal data you would provide to us directly, if necessary to fulfil this purpose.	We rely on our legitimate interests to run our business, which includes taking the necessary steps to advance customer relationship management.
Management of legal claims and risks	We process your personal data in connection with with our legal rights and	Name, e-mail, telephone, fax, address and other personal data that you	We rely on our legitimate interests to running our business, which it

obligations, for the following purposes:	would provide us directly, necessary to achieve this .	taking the necessary steps to protect our business involves.
 take the necessary measures to enforce or defend against legal actions brought by you, against you, or otherwise involving you; Periodic reporting at group level. 		

Chimes	We use a dedicated platform to report suspected misconduct regarding violations of applicable laws, Holcim's Code of Business Conduct and other Holcim policies and guidelines and to investigate the reported matters.	Name, e-mail, telephone, fax, address, passport number, national registration number, business address, date of birth, salary or compensation information, position within the organisation, financial account information, reported details of suspected misconduct, details of possible violations of applicable laws, Holcim's code of business conduct and other Holcim policies and guidelines. Some of these personal data are collected from other	Depending on the jurisdiction where the processing is done, the processing is either required: • to comply with a legal obligation we have to fulfil or • to pursue our legitimate interests and take the necessary measures to protect our business, which includes maintaining our reputation and acting appropriately in all countries where we do business. In case certain personal data have a special arrangement according to the
		sources and not directly from you, respectively at the whistleblower, other business partners and public accessible sources.	data protection laws, we will provide such data process insofar as one or more guarantees prescribed by the legislation relating to the processing of such data from apply.

Data processing as an obligation imposed by law	We process your data in the context of providing services in order to comply with legal obligations we are required to fulfil, for example to meet lawful requests from government, courts, government regulations or regulatory authorities (including without limitation data protection, taxation and employment), albeit within or outside your .	Name, e-mail, phone, fax, address and other personal data that you would provide to us directly, necessary to achieve this purpose or that follow from our relationship.	This processing is necessary to meet the legal obligation we have to comply with.
Direct marketing	We process your personal data to provide you with our newsletters in electronic form about our services and products, but only if you have registered for them and thus given your explicit consent for such processing. We use your personal data to decide which marketing messages are sent to you	Name, e-mail, phone, fax, address and other personal data you would provide to us directly, necessary to fulfil this purpose or that follow from our relationship.	To send marketing messages, we rely on your explicit consent for such processing. You can withdraw your consent at any time, expressing your choice not to receive our newsletters in the future by clicking 'Unsubscribe' when you receive the respective messages or by using the contact details mentioned in this Privacy Policy.

	sent. These decisions will generally have no legal consequences for you and no major impact on you. In cases where the decisions would have such adverse effects on you, you will be provided with details on the relevant logic and importance of the possible consequences of such processing prior to the processing. In those cases, you have the right to obtain human intervention, to express your point of view and to consent to such decisions. For example, we can the marketing messages you based on the industry you work in, your title and the preferences you have selected.		To decide which marketing message is suitable for you, we rely on our legitimate interests to conduct appropriate promotional activities. We will seek your explicit consent for such segmentation if the law requires us to do so, for example in case the decisions taken according to the segmentation process would have legal consequences for you or would have a major impact on you.
Other marketing campaigns	We process your personal data to run certain marketing campaigns, such as customer satisfaction surveys, to give us an insight into what you think of our products and services. This may also include telemarketing campaigns, online surveys, etc.	Name, e-mail, phone, fax, address and other personal data that you would provide to us directly, necessary to achieve this purpose or that follow from our relationship.	Depending on the jurisdiction where the processing is done, the processing grounds are either: • the legitimate interests of Holcim or • your explicit consent to such processing. The aforementioned legitimate interests consist of taking the

	necessary measures to improve our
	improve services and products on an ongoing basis. In the event that the processing is based on your consent, you may withdraw your consent at any time, expressing your choice not to receive our newsletters in the future by clicking 'Unsubscribe' when you the respective messages or by using the contact details provided in this Privacy policy, to be .

2. Indien u een vertegenwoordiger of contactpersoon van een klant of potentiële klant van Holcim bent

Activity	Purposes	Categories of personal data and sources	Processing grounds
Customer research procedures and reporting	We process your personal data to conduct customer research prior to the contractual relationship with the entity you represent or by whom you are employed, which is a potential customer of Holcim is.	Name, e-mail, phone, fax, address, data resulting from the customer survey and other personal data you would provide us directly, necessary to achieve this purpose. Some of this personal data will be	Depending on the jurisdiction where the processing is done, the processing is either required: • to comply with a legal obligation we have to fulfil or • to our

This may, if and to the extent that required or permitted by , controls on anti-money laundering, anti	collected from other sources and not directly with you,	pursue legitimate interests and make the necessary take action
include bribery, anti-corruption and other similar controls. We conduct such customer due diligence to ensure that working with you is appropriate and that potential risks are identified and managed before entering into the contractual relationship with you.	respectively with the entity you represent or by whom you are employed, our service providers, business partners and publicly available sources.	to protect our business, namely maintain our business activities and develop them. In the event that certain personal data have a special regime under data protection laws, we will process such data to the extent that one or more guarantees prescribed by the laws relating to the processing of such data apply.

Provide the services requested by the entity you represent or by whom you are employed.	We process your personal data for the following purposes: • negotiating the terms of cooperation with the entity you represent or by whom you are employed and concluding the agreement;	address and other personal data you would provide us directly, necessary to fulfil this purpose. Some of this personal data is collected from the entity you represent or by whom	We rely on our legitimate interests in providing services according to the sector of our business and in managing our customer relationships.
	Provide the services requested by you and manage the aspects that follow from our contractual relationship with the entity you represent or by whom you are employed;	you are employed.	

	 communicate with you in relation to any aspect concerning the services you have requested (e.g. providing you with pricing information, delivering the products purchased, managing and promoting cooperation and preparing invoices); the payment of goods and promote services; 		
Customer administration	We process your personal data for customer administration purposes, namely to: • Create, manage and maintain a Customer Relationship Management (CRM) database, including relevant organisation charts; • keep records regarding our clients, such as minutes of meetings and other notes;	Name, e-mail, telephone, fax, address and other personal data you would provide to us directly, if necessary to achieve this purpose. Some of this personal data is collected from the entity you represent or by whom you are employed.	For this processing, we rely on our legitimate interests to run our business, which includes taking the necessary steps to further customer relationship management.

Management of legal claims and risks	We process your personal data in connection with our legal rights and obligations, for the following purposes: • take the necessary steps to pursue legal actions brought by you or the entity you represent or by whom you are employed, against you or that entity or	Name, e-mail, telephone, fax, address and other personal data you would provide to us directly, if necessary to achieve this purpose. Some of this personal data is collected from the entity you represent or by whom you are employed.	We rely on our legitimate interests to run our business, which includes taking the necessary steps to protect our business.
	involving you or that entity any other way, to enforce or defend against it; • periodic reporting at the group level.		

Chimes	We use a dedicated platform to report suspected misconduct regarding possible violations of applicable laws, Holcim's Code of Business Conduct and other Holcim policies and guidelines and to investigate the reported matters.	Name, e-mail, telephone, fax, address, passport number, national registration number, business address, date of birth, salary or compensation information, position within the organisation, financial account information, reported details of suspected misconduct, details of possible violations of applicable laws, Holcim's code of business conduct and other Holcim policies and guidelines. Some of this personal data is collected from other sources and not directly from you, respectively from the whistleblower, other business partners and publicly available sources.	Depending on the jurisdiction where the processing is done, the processing is either required: • to comply with a legal obligation we have to fulfil or • to pursue our legitimate interests and take the necessary measures to protect our business, which includes maintaining our reputation and acting appropriately in all countries where we do business. In the event that certain personal data have a special regime under data protection laws, we will process such data to the extent that one or more guarantees prescribed by the laws relating to the processing of such data of apply.
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Data processing As an obligation imposed by law	We process your data in the context of providing services in order to comply with legal obligations we are required to fulfil, for example to meet lawful requests from public authorities, courts, government regulations or regulatory bodies (including without limitation data protection, taxation and employment), albeit within or outside your .	Name, e-mail, telephone, fax, address and other personal data you would provide to us directly, if necessary to achieve this purpose. Some of this personal data is collected from the entity you represent or by whom you are employed.	This processing is necessary to meet the legal obligation we have to comply with.
Direct marketing	We process your personal data to provide you with our newsletters in electronic form about our services and products, but only if you have registered for them and thus given your explicit consent for such processing. We use your personal data to decide which marketing messages are sent to you. These decisions generally have no legal consequences for you and no major impact on you. In cases where the decisions have such adverse consequences would have for you, you will, prior to processing	Name, e-mail, phone, fax, address and other personal data you would provide to us directly, necessary to achieve this purpose. Some of this personal data is collected from the entity you represent or by whom you are employed.	To send marketing messages, we rely on your explicit consent for such processing. You can withdraw your consent at any time, expressing your choice not to receive our newsletters in the future by clicking 'Unsubscribe' when you receive the respective messages or by using the contact details mentioned in this Privacy Policy. To decide which marketing message is appropriate for you, we rely on our legitimate interests to conduct appropriate promotional activities. We will use your seek explicit consent for such

	get details on the relevant logic and importance of the possible consequences of such processing. In such cases, you have the right to human intervention, to express your point of view and to consent to such decisions. For example, we can tailor the marketing messages you based on the sector you work in, your job title and the preferences you selected.		segmentation, if the law requires us to do so, for example in case the decisions taken according to the segmentation process would have legal consequences for you or would have a major impact on you.
Other marketing campaigns	We process your personal data to run certain marketing campaigns, such as customer satisfaction surveys, to give us an insight into what you think of our products and services. This may also include telemarketing campaigns, online surveys, etc.	Name, e-mail, phone, fax, address and other personal data you would provide to us directly, necessary to fulfil this purpose. Some of this personal data is collected from the entity you represent or by whom you are employed.	Depending on the jurisdiction where the processing is done, the processing grounds are either: • the legitimate interests of Holcim or • your explicit consent to such processing. The above legitimate interests consist of taking the necessary measures to improve our services and products on an ongoing basis. In the event that the processing is based on your consent, you can cancel your

	consent at any time, expressing your choice to withdraw our
	not to receive future newsletters by clicking 'Unsubscribe' when you receive the respective messages or by providing the contact details, mentioned in this Privacy policy, to be .

3. Indien u een leverancier, onderaannemer of andere zakenpartner van Holcim bent

Activity	Purposes	Categories of personal data and sources	Processing grounds
Customer research procedures and reporting	We process your personal data to customer research prior to our contractual relationship. This may include, if and to the extent required or permitted by, controls on anti-money laundering, anti-bribery, anti-corruption and	Name, e-mail, phone, fax, address, data resulting from the customer survey and other personal data you would provide us directly, necessary to achieve this purpose. Some of this personal data will be	Depending on the jurisdiction where the processing is done, the processing is either required: • to comply with a legal obligation we have to fulfil or • to our legitimate

	other similar controls include. We do such a customer survey to ensure ensuring that the relationship with you is appropriate	collected from other sources and not directly with you, respectively at our service providers,	represent interests and take the necessary measures To protect our business, namely
	is and that potential risks are determined and managed before entering into the contractual relationship with you.	business partners and publicly available sources.	maintain our business activities and develop them. In the event that certain personal data have a special regime under data protection laws, we will process such data to the extent that one or more guarantees prescribed by the legislation relating to the processing of such data apply.
Maintaining our contact relationship with you	We process your personal data for the following purposes: • negotiating the terms of the contractual relationship with you and concluding the agreement; • maintain our contractual relationship with you • communicate with you on matters relating to with the business.	Name, e-mail, phone, fax, address and other personal data you would provide to us directly, necessary to fulfil this purpose.	We rely on the performance of the concluded with you.

Management database of contractual partners	We process your personal data for managing the database of contractual partners, namely to:	Name, e-mail, phone, fax, address and other personal data you would provide to us directly, necessary to achieve this purpose.	We rely on our legitimate interests to run our business, which involves taking the necessary steps
	 create, manage and a database of our contractual partners; keep records of our contractual partners, including minutes of meetings and other notes; 		To promote our customer relationship management implies.

Management of legal claims and risks	We process your personal data in connection with our legal rights and obligations, for the following purposes: • take the necessary measures to enforce or defend against legal actions brought by you, against you, or otherwise involving you; • periodic reporting at group level. • examine and maintain reports to that our suppliers and subcontractors have appropriate qualifications and training to ensure safe operations at our sites (supplier training reports).	Name, e-mail, phone, fax, address and other personal data you would provide to us directly, necessary to achieve this purpose.	We rely on our legitimate interests to run our business, which includes taking the necessary steps to protect our business. In relation to supplier training reports, depending on the jurisdiction, their processing may be based on legal obligations we have to comply with.
Chimes	We use a specific platform to report suspected misconduct regarding	Name, e-mail, phone, fax, address, passport number, national registry number, business	According to the jurisdiction Where the processing is done, the processing is either necessary:

	possible violations of applicable laws, Holcim's code of business conduct and other Holcim policies and guidelines, and investigate reported matters.	address, date of birth, salary or compensation information, position within the organisation, financial account information, reported details of suspected misconduct, details of possible violations of applicable laws, Holcim's code of business conduct and other Holcim policies and guidelines. Some of this personal data is collected from other sources and not directly from you, respectively from the whistleblower, other business partners and publicly available sources.	to comply with a legal obligation we have to fulfil or to pursue our legitimate interests and take the necessary measures to protect our business, which includes maintaining our reputation and acting appropriately in all countries where we do business. In the event that certain personal data have a special regime under data protection laws, we will process such data to the extent that one or more guarantees prescribed by the laws relating to the processing of such data of apply. This process is a second to fulfill the full to the processing of such data of apply.
Data processing As an obligation imposed by law	We process your data in the context of providing services to comply with legal obligations we have to fulfil, for example, to fulfil lawful requests from public authorities, courts, government regulations or	Name, e-mail, phone, fax, address and other personal data you would provide to us directly, necessary to achieve this purpose.	This processing is necessary to meet the legal obligation we have to comply with.

regulatory authorities (including without limitation data	
protection, taxation and	
employment), albeit within	
or outside your .	

Direct marketing	We process your personal data	Name, e-mail, phone, fax,	To send marketing messages,
3	to provide you with our	address and other personal	we rely on your explicit consent
	newsletters in electronic form	data you would provide to	for such processing. You can
	about our services and products,	us directly, necessary to	withdraw your consent at any
	but only if you have registered for	achieve this purpose.	time, expressing your choice
	them and thus given your explicit	derileve tille parpede.	not to receive our newsletters
	consent for such processing.		in the future by clicking
	consent for such processing.		'Unsubscribe' when you receiv
	We use your personal data to		the respective messages or by using the contact details
	We use your personal data to decide which marketing		mentioned in this Privacy
	messages are sent to you. These		Policy.
	decisions generally have no legal		To decide which marketing
	implications for you and no		message is suitable for you, w
	significant impact on you. In		rely on our legitimate interests
	cases where the decisions would		to conduct appropriate
	have such unfavourable		promotional activities. We will
	consequences for you, you will be		seek your explicit consent for
	given details of the relevant logic		such segmentation if the law
	and importance of the possible		requires us to do so, for
	consequences of such processing		example in case the decisions
	prior to the processing. In those cases, you have the right to		taken according to the segmentation process would
	request a		have legal consequences for
	human intervention to		you or would have a major
	get, to express your point of view		impact on you.
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	and to agree to such decisions. For example, we can the marketing messages you based on the industry you work in, your job title and the preferences you have selected.		
Other marketing campaigns	We process your personal data to run certain marketing campaigns, such as customer satisfaction surveys, to give us an insight into what you think of our products and services. This may also include telemarketing campaigns, online surveys, etc.	Name, e-mail, phone, fax, address and other personal data you would provide to us directly, necessary to fulfil this purpose or that follow from our relationship.	Depending on the jurisdiction where the processing is done, the processing grounds are either: • the legitimate interests of Holcim or • your explicit consent to such processing. The above legitimate interests consist of taking the necessary measures to improve our services and products on an ongoing basis. In case the processing is based on your consent, you can always withdraw your consent, expressing your choice to receive our newsletters in future no longer to be received by

	click on 'Unsubscribe
	when you receive the respective messages or by the contact details listed in this Privacy Policy.

4. Indien u een vertegenwoordiger of contactpersoon van een leverancier, onderaannemer of andere zakenpartner van Holcim bent

Activity	Purposes	Categories of	Processing grounds
		personal data	
		and sources	

Customer research procedures	We process your personal data	Name, e-mail, telephone,	Depending on the jurisdiction
and reporting	to customer research prior to our contractual relationship. This may include, if and to the extent required or permitted by , anti-money laundering, anti-bribery, anti-corruption and other similar controls. We conduct such customer research to that the relationship with you is appropriate and that potential risks are identified and managed	fax, address, data resulting from the customer survey and other personal data you would provide to us directly, necessary to fulfil this purpose. Some of this personal data is collected from other sources and not directly from you or the entity you represent or by whom you are employed, respectively, our service providers,	where the processing is done, the processing is either required: • to comply with a legal obligation we have to fulfil or • to protect our legitimate interests and take the necessary measures to protect our business, namely our business activities to

	before entering into the contractual relationship with you.	business partners and publicly available sources.	preserve and develop them. In the event that certain personal data have a special regime under data protection
			laws, we will process such data to the extent that one or more safeguards prescribed by the laws relating to the processing of such data from apply.
Maintain our contractual relationship with the entity that u represents or by whom u employed.	 We process your personal data for the following purposes: negotiating the terms of the relationship with the entity you represent or by whom you are employed and concluding the agreement; Maintain our contractual relationship with the entity you represent or by whom you are employed. Communicate with you about your requests and other matters related to the business; the payment of goods and promote services; 	Name, e-mail, phone, fax, address and other personal data you would provide to us directly, necessary to fulfil this purpose. Some of this personal data is collected from the entity you represent or by whom you are employed.	We rely on our legitimate interest in managing the relationship with the entity you represent or by whom you are employed.

Management database of contractual partners	We process your personal data for managing the database of contractual partners, namely to: • create, manage and a database of our contractual partners; • maintain records of our contractual partners, including minutes of meetings and other notes;	Name, e-mail, phone, fax, address and other personal data you would provide to us directly, necessary to achieve this purpose. Some of this personal data is collected from the entity you represent or by whom you are employed.	We rely on our legitimate interests to run our business, which includes taking the necessary steps to advance customer relationship management.
Management of legal claims and risks	We process your personal data in connection with our legal rights and obligations, for the following purposes: • take the necessary measures to enforce or defend against legal actions brought by you, against you, or otherwise involving you; • periodic reporting at group level. • examine and maintain reports to that our suppliers and subcontractors have appropriate qualifications and training Have to have secure operations on our sites	Name, e-mail, phone, fax, address and other personal data you would provide to us directly, necessary to achieve this purpose. Some of this personal data is collected from the entity you represent or by whom you are employed.	We rely on our legitimate interests to run our business, which includes taking the necessary steps to protect our business. In relation to supplier training reports, depending on the jurisdiction, their processing may be based on legal obligations we have to comply with.

Chimes	secure (training reports supplier). We use a dedicated platform to	Name, e-mail, telephone,	Depending on the jurisdiction
	report suspected misconduct regarding possible violations of applicable law , Holcim's code of business conduct and other Holcim's policies and guidelines and to conduct research do to the reported cases.	fax, address, passport number, national registration number, business address, date of birth, salary or compensation information, position within the organisation, financial account information, reported details of suspected misconduct, details of possible violations of applicable laws, Holcim's code of business conduct and other Holcim policies and guidelines. Some of this personal data is collected from other sources and not directly from you, respectively, from the entity you represent or by whom you are employed, the whistleblower, our business partners and publicly available sources.	where the processing is done, the processing is either required: • to comply with a legal obligation we have to fulfil or • to pursue our legitimate interests and take the necessary measures to protect our business, which includes maintaining our reputation and acting appropriately in all countries where we do business. In the event that certain personal data has a special regime under data protection laws, we will process such data to the extent that one or more guarantees prescribed by the legislation with with regard to processing

Data processing as an obligation imposed by law	We process your data in the context of providing services to comply with legal obligations we are required to fulfil, for example, to fulfil lawful requests from government, courts, government regulations or regulatory authorities (including without limitation data protection, taxation and employment), albeit within or outside your .	Name, e-mail, phone, fax, address and other personal data you would provide to us directly, necessary to achieve this purpose. Some of this personal data is collected from the entity you represent or by whom you are employed	of such data from apply. This processing is necessary to meet the legal obligation we have to comply with.
Direct marketing	We process your personal data to provide you with our newsletters in electronic form about our services and products, but only if you have registered for them and thus given your explicit consent for such processing. We use your personal data to decide which marketing messages are sent to you. These decisions generally have no legal implications for you and no major impact on you. In cases where the decisions	Name, e-mail, telephone, fax, address and other personal data you would provide to us directly, if necessary to achieve this purpose. Some of this personal data is collected from the entity you represent or by whom you are employed.	To send marketing messages, we rely on your explicit consent for such processing. You can withdraw your consent at any time, expressing your choice not to receive our newsletters in the future by clicking 'Unsubscribe' when you receive the respective messages or by using the contact details mentioned in this Privacy Policy. To decide which marketing message is right for you, we rely on our legitimate interests to

	would have such unfavourable consequences for you, you will be given details on the relevant logic and importance of the possible consequences of such processing prior to the processing. In such cases, you will have the right to human intervention, to express your views and to consent to such decisions. For example, we can the marketing messages you based on the industry you work in, your job title and preferences you have selected.		conduct appropriate promotional activities. We will seek your explicit consent for such segmentation if the law requires us to do so, for example in case the decisions taken according to the segmentation process would have legal consequences for you or would have a major impact on you.
Other marketing campaigns	We process your personal data to run certain marketing campaigns, such as customer satisfaction surveys, to give us an insight into what you think of our products and services. This may also include telemarketing campaigns, online surveys, etc.	Name, e-mail, phone, fax, address and other personal data you would provide to us directly, necessary to fulfil this purpose. Some of this personal data is collected from the entity you represent or by whom you are employed.	Depending on the jurisdiction where the processing is done, the processing grounds are either: • the legitimate interests of Holcim or • your explicit consent to a such processing. The aforementioned legitimate interests consist of taking the necessary measures to ensure that our services and products at

			permanent basis to improve. In the event that the processing is based on your consent, you can always withdraw your consent and express your choice not to receive our newsletters in the future by clicking on 'Unsubscribe' when you receive the respective messages or by using the contact details provided in this Privacy policy, to be .
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5. Indien u een sollicitant bent

Activity	Purposes	Categories from personal data and sources	Processing grounds
Recruitment and selection	If you apply for a job with Holcim or express an interest in working with us, we will use your personal data to carry our recruitment and selection process. These processes include identifying you and communicating with you in connection with the application, considering you against the criteria related to the position for which you are applying and against other applicants and	Title, first name, other first name(s) and surname, birth name and additional names, sex, nationality, second nationality, date of birth, age, address, telephone number, email, national register number, data on immigration and fitness to work, language skills, driving licence, qualifications, references, CV and application, interview and evaluation data, other data you	Depending on the jurisdiction where the processing takes place, the processing of your personal data for these purposes is either: • needed for our legitimate interests to receive applications for vacancies in our organisation or • based on your explicit

make the final hiring decisions. If your application is, we would like to keep your personal data for 1 year to reconsider you for positions similar to those you originally applied for.	would provide directly to us, necessary for this purpose.	consent to such processing. In case the processing is based on your consent, you can always withdraw your consent through the means mentioned when your consent is required or by using the contact details mentioned in this Privacy Policy.
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Background checks	Before your recruitment to us, we may carry out some background checks. These may include, if relevant and appropriate, checks on reputation, driving licence, identity fraud, requests for criminal record extracts (if and to the extent permitted by applicable law), relevant employment history, relevant legal status and professional qualifications.	Title, first name, other first name(s), surname birth name and additional names, gender, nationality, second nationality, date of birth, age, address, telephone number, e-mail, national registration number, data on immigration and fitness to work, language skills, driving licence, qualifications, references, CV and application, interview and evaluation data, other data you would provide directly to us, necessary for this purpose. Some of the personal data are collected directly from references and publicly available sources, respectively.	Depending on the jurisdiction where the processing is done, the processing is either required: • to comply with a legal obligation we have to fulfil or • to protect our legitimate interests and take the necessary measures to ensure that only suitable and appropriate applicants are selected. In case certain personal data have a special regime under data protection laws, we will provide such data
			process to the extent that one or more safeguards prescribed by law in relation to the processing of such data.

6. Indien u een deelnemer bent aan onderwijs- en gemeenschapspartnerships

Activity	Purposes	Categories of personal data and sources	Processing grounds
Recruitment and selection	If you apply for career programmes (internships, work experience, learning and study programmes) and for community partnership programmes organised by or in cooperation with Holcim, we process your personal data to carry out the recruitment and selection processes. If your application is unsuccessful, we would like to keep your personal data for 1 year to reconsider you for positions similar to the one you originally applied for.	Title, first name, other first name or names, surname, birth name and additional names, sex, nationality, second nationality, date of birth, age, address, telephone number, e-mail, national register number, data on immigration and suitability to work, language skills, driving licence, qualifications, references, CV and application, interview and evaluation records, other data you directly	Depending on the jurisdiction where the processing takes place, the processing of your personal data for these purposes is either: • needed to pursue our legitimate interests and receive applications for education and community partner s hips or

		would provide to us necessary for this purpose.	based on your explicit consent to such processing. In case the processing is based on your consent, you can
			always withdraw your consent through the means indicated when your consent is required or by using the contact details mentioned in this Privacy Policy.
Background checks	Before your recruitment to us, we may carry out some background checks. These may include, if relevant and appropriate, checks on reputation, driving licence, identity fraud, requests for criminal record extracts (if and to the extent permitted by applicable law), relevant employment history, relevant legal status and professional qualifications.	Title, first name, other first name or names, surname, birth name and additional names, sex, nationality, second nationality, date of birth, age, address, telephone number, email, national register number, immigration and employment eligibility data, language skills, driving licence, qualifications, references, CV and application, interview and evaluation data, other data you would provide directly to us, necessary for this purpose. Some	Depending on the jurisdiction where the processing is done, the processing is either required: • to comply with a legal obligation we have to fulfil or • to our legitimate interests and take the necessary measures to ensure that only suitable and appropriate applicants are selected. In the event that certain personal data is a

of the personal data	
are collected directly from references and publicly available sources, respectively.	have special arrangement under data protection laws, we will process such data to the
	extent that one or more guarantees prescribed by the laws relating to the processing of such data of apply.

7. Indien u een werknemer, aannemer of werkkracht bent

Activity	Purposes	Categories of personal data and	Processing grounds
		Sources	

HR administration	We process your personal data for management of your employment or other relationship with us, for the following main purposes: • general HR and personnel administration, wages and benefits, reimbursement of expenses, travel and time recording, training and development, performance management, sickness and absence management,	Title, first name, other first name, -names, surname, birth name and additional names, gender, nationality, second nationality, date of birth, age, address, telephone number, e-mail, national register number, immigration and suitability to work data, language skills, driving licence, qualifications, references, CV and application,	Depending on the jurisdiction and the specific purpose, the processing is either required: • for the performance of your agreement with Holcim, • to comply with a legal obligation we have to fulfil or
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- emergency contact, complaint and disciplinary procedures, equal opportunities monitoring and business continuity planning;
- workforce planning, allocation and development, considering your suitability for any of our current or future employment opportunities, assigning you to project teams, knowledge pools or other internal groups and to confirm your credentials, character and educational background;
- secondment, relocation and business travel purposes, dealing with local authorities or organisations, doctors, secondment agencies, travel agents and other service providers;
- <u>organisational purposes</u>, planning, controls, budgeting, benchmarking and restructuring;
- security purposes, maintain and protect our property, ensure the integrity and security of and access to our buildings, facilities, IT and communications systems, platforms and secure websites and web applications and

interview and evaluation data, other data that you would provide directly to us or that follow from the context of our relationship.

Some of the personal data are collected directly from references and publicly available sources, respectively.

To pursue our legitimate interests.

Moreover, if required by law, the processing of your personal data will be based on your consent, where you have explicitly given it to us. Our legitimate interests consist of managing our personnel and business operations, for example, conducting normal business activities and maintaining a dialogue with our employees, contractors and work force, ensuring that each employee, contractor and work force performs appropriate tasks, is properly trained and performs their duties correctly and in accordance with appropriate procedures. In the event that certain personal data has a special regime under data protection laws, we will process such data to the extent that one or more guarantees prescribed

other systems or	by the legislation with

facilities (including camera surveillance or other means of surveillance) investigate, prevent and detect security threats, fraud, theft and other criminal or malicious activities • legal documentation purposes, to compliance with legal documentation obligations and document retention (such as registration requirements); • compliance organisational rules,	relating to the processing of such apply.
particular monitor and assess compliance with our policies and standards (e.g. implementing a system of internal reporting and dispute management- Integrity Line Platform - which allows reporting of suspected misconduct regarding possible violations of applicable law, Holcim's code of business conduct and other Holcim policies and guidelines and conduct investigations into the reported matters on a professional, fair and independent way)	

• regulatory compliance, ensure compliance with our legal and regulatory obligations and requests anywhere in the world, including reporting to or being heard by national and international regulatory, enforcement or exchange authorities including: conducting reference searches, background checks, state registry checks, conflict investigations, credit investigations, criminal records investigations (if applicable) and other investigative procedures as required under applicable laws and regulations • general compliance, compliance with legal obligations, such as compliance with screening or registration obligations (e.g. according to antitrust laws, export laws, trade sanction and embargo laws, or to white collar crime or money laundering crimes), including: checks of your contact or identity details lists of sanctioned parties and you contact to establish your identity

confirm in case of a potential agreement or record your interactions with third parties if relevant for antitrust purposes; • disputes and bringing legal actions, including assisting us in handling and resolving disputes, complying with injunctions issued by courts, authorities or other public bodies, enforcing our contractual agreements and bringing, exercising or opposing legal actions defend.	

8. Indien u een familielid of een persoon ten laste bent van werknemers, aannemers en werkkrachten van Holcim

Activity	Purposes	Categories of personal data and sources	Processing grounds
Manage emergency contact	We process your personal data to contact you in an emergency, to inform you in case of accidents or problems at work with our employees, contractors and work force.	Contact details provided by our employees, contractors and work force.	Depending on the jurisdiction in which the employees, contractors and workers carry out their activity, the processing of your personal data for this purpose is either necessary: • to comply with a legal obligation which we must comply with

			or
			to look after our legitimate interests to ensure that our employees, contractors and work force in stay safe.
Administration of benefits	We process your personal data to provide and manage your benefits by virtue of your status as a family member or dependant of our employees, contractors and workers. Such benefits may include medical insurance and entitlement to pension or life insurance.	Contact details provided by employees, contractors and workers and other data you provide directly to us.	Depending on the jurisdiction in which the employees, contractors and workers carry out their activity and depending on the type of benefit granted by Holcim, the processing of your personal data for this purpose is either necessary: • to comply with a legal obligation we have to fulfil or • to look after our legitimate interests to manage our staff and run the business, including giving you access to benefits guarantee.

Activity	Purposes	Categories of personal data and sources	Processing grounds
Archiving	We process your personal data for archiving purposes.	Personal data in the personnel file or in other documents or media, if necessary to achieve the purpose.	Depending on the jurisdiction where you exercised your activity, the processing of your personal data for this purpose is either: • to comply with a legal obligation we have to fulfil or • To pursue our legitimate interests which consist of conducting business.
Data processing as an obligation imposed by law	We process your personal data to comply with legal obligations that Holcim must fulfil in its capacity as your former employer.	Name, e-mail, phone, fax, address and other personal data that you would provide to us directly, necessary to achieve this purpose or that were processed by us during the last relationship with you.	The processing ground is the legal obligation we have to comply with.

10. Indien u een aandeelhouder met aandelen in Holcim bent

Activity	Purposes	Categories of personal data and sources	Processing grounds

Managing your relationship with Holcim	 We process your personal data to: manage your relationship with Holcim as a company director or authorised person; maintain the legal registers of our group companies; manage compliance with regulatory and legal obligations arising from our relationship; archive and manage your directorship/authorised person details, if; create and manage reports of meetings. 	Name, e-mail, phone, fax, address and other personal data you would provide to us directly, necessary to this purpose.	Depending on the jurisdiction where you carry out your activity, the processing of your personal data for this purpose is either necessary: • to comply with a legal obligation we have to fulfil or • to pursue our legitimate interests consisting of our business operations, which includes managing our relationship with our directors and trustee persons.
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11. Indien u een bedrijfsdirecteur of gevolmachtigd persoon bent

Activity	Purposes	Categories	of	Processing grounds
		personal data		
		and sources		

Managing your relationship with Holcim	We process your personal data to: manage your relationship with Holcim as a company director or authorised person;	Name, e-mail, phone, fax, address and other personal data you would provide to us directly, necessary to this purpose.	Depending on the jurisdiction where you carry out your activity, the processing of your personal data for this purpose is either necessary: • To comply with a legal obligation that we must comply or
	 maintain the legal registers of our group companies; manage compliance with regulatory and legal obligations arising from our relationship; archive and manage your directorship/authorised person details, if; reports of meetings to create and manage. 		to pursue our legitimate interests consisting of our business operations, which includes managing our relationship with our directors and authorised persons.

Activity	Purposes	Categories of personal data and sources	Processing grounds
Event management	We process your personal data in the context of your participation in the events, organised by or in cooperation with Holcim, for the following purposes:	Name, e-mail, phone, fax, address and other personal data you would provide us directly, necessary to this purpose.	Such processing is necessary to safeguard the legitimate interests pursued by Holcim in relation to its business operations, including keeping
	Manage a database of potential		promotional and educational
	 Manage a database of potential guests and participants; making invitations; manage the event or conference; Prepare documentation for the events including images, names, biographies and contact details of participants, if any. 		events. To the extent required by, we will process your personal data based on your explicit consent. In this case, you may withdraw your consent by using the methods, made available for each event or by using the contact details, mentioned in this Privacy Policy, to use.

Taking close-up photos /	We may process your personal	Photo/video footage and other	In this case, we base our data
video recordings	data in the context of taking close-	personal data that you provide to	processing on your consent,
	up photos/video recordings during	us directly on your initiative.	given by your unmistakable act of entering the areas designated to
	your participation in the events, organised by or in cooperation with		take photos/video recordings.
	Holcim		You may withdraw your consent
			by using the methods, made
			available for each event or by
			contacting the contact details,
			listed in this
			Privacy policy, to be .

13. Indien u een journalist of mediavertegenwoordiger bent

Activity	Purposes	Categories of personal data and sources	Processing grounds
Managing contacts	We process your personal data to maintain a database of journalists and other media representatives and to communicate with you on various topics (e.g. to provide updates on our business activities and performance sharing)	Name, e-mail, phone, fax, address and other personal data you would provide to us directly, necessary to this purpose.	This processing is necessary to pursue the legitimate interests intended by Holcim to manage and promote our business activities.

14. Indien u een bezoeker van onze gebouwen bent

Activity	Purposes	Categories of personal data and sources	Processing grounds
Safety management	We process your personal data to ensure security of our buildings, assets and staff to guarantee. For this purpose: • we keep a log of visitors to all our buildings so that we have a record of all visitors to our buildings; • we have video surveillance systems in our buildings and their surroundings (which include footpaths and other public areas).	Name, e-mail, phone, fax, address and other personal data you would provide to us directly, necessary to this purpose.	Depending on the jurisdiction where Holcim's premises are located, the processing of your personal data for this purpose is either necessary: • to comply with a legal obligation we have to fulfil or • to pursue our legitimate interests consisting of the protection of our premises,

				assets and personnel.
Your facilitate	visit	We process your personal data to take the necessary actions to facilitate your visit, for example by providing access to our technical equipment and networks.	Name, e-mail, telephone, fax, address, data resulting from the use of our technical equipment and networks and other personal data you would provide us directly, necessary to achieve this purpose.	Processing your personal data for this purpose is necessary to pursue our legitimate interests i.e. to make your visit as pleasant as possible for you.

15. Indien u een gebruiker van onze Internetwebsite(s) bent

Activity		Purposes	Categories of personal data and sources	Processing grounds
Our website	Internet	We process the personal data we collect from you when you visit our internet website to ensure your appropriate use of all available functionalities on the website, to monitor website traffic and improve website content. For these purposes, we use cookies, as described in the Cookies Policy.	Personal data you provided us by filling forms on websites, information about your visits to the website such as web traffic data, location data and other communication data and information about the equipment we used to access the website.	The processing of your personal data for this purpose is based on our legitimate interest to ensure the proper functioning of our Internet website and its improvement.

16. Indien u een lid bent van het grote publiek

Activity	Purposes	Categories of personal data and sources	Processing grounds
Messages receiving from members of the general public manage	We process your personal data to receive and respond to your requests or messages and to take the necessary actions to manage communications. We process your personal data to keep a record of your notice if required by law or in the event that such processing is necessary to legal claims brought by you, against you or otherwise involving, or to provide a defence with respect to the legal claim can conduct.	Personal data you have provided to us within the request or communication and during correspondence with you.	We base this data processing activity on our legitimate interest to run our business, which includes: receiving and recording the messages received, managing and taking the necessary measures to enforce legal claims initiated by you, against you or otherwise involving you, or being able to conduct a defence regarding the legal claim.

17. Voor alle bovengenoemde categorieën van betrokkenen

Activity	Purposes	Categories personal data	of	Processing grounds
		and sources		

Changes in	We may also process your data in	Personal data processed for the	In this case, the processing
structure or	the context of structure changes or	initial purposes listed in section	grounds may be based on:
similar		1-16.	
transactions in which			

Holcim	similar transactions involving Holcim.	
involved		 the legal obligation (in case Holcim is legally obliged to certain data to the government). the performance of the agreement entered into by Holcim in the context of such a transaction (if you are a party to such an agreement) or Holcim's legitimate interest in carrying out the transaction in the most efficient manner (in other).

II. VERSTREKKEN VAN PERSOONSGEGEVENS

When we ask you to provide us with your personal data, Holcim asks you to provide all categories of personal data that we request. You are free to refuse to provide your personal data, but if you do not provide specific details, we may not be able to continue our relationship with you or provide you with the requested services, when:

- the processing is required to comply with a legal obligation or to perform the contract to which you are a party, or
- we cannot achieve the processing purposes described above without processing such data.

If you provide us with personal data of other natural persons, we kindly ask you to inform them of the way Holcim intends to process their personal data, as described in this Privacy Policy, prior to such disclosure.

III. BEKENDMAKING VAN UW PERSOONSGEGEVENS

To achieve the above purposes and to the extent necessary, we disclose or may disclose your personal data to the following categories of recipients:

- a. other companies belonging to the Holcim group;
- b. central/local government authorities, government agencies, government providers of health services, social security agencies and others:
- c. providers of payment services
- d. providers of analysis services
- e. Service providers IT support, storage and hosting;
- f. accountants, lawyers and providers of legal and financial services;
- g. suppliers of travel and accommodation services;
- h. tax and financial providers, benefits providers, payroll administrators;
- i. providers of HR services;
- j. agents, consultants, contractors and other third parties providing services to Holcim;
- k. brokers, banks, insurance agents;
- I. professional organisations (trade unions);
- m. other contractual partners of Holcim to whom data must be communicated so that they can provide the services addressed in the relevant agreements;
- n. other individuals or entities to whom data would be disclosed at your request.

We will disclose your personal data to the above recipients:

- if we are required or authorised to do so by law or in the context of legal proceedings, for example to enforce a court order or to comply with a request from a law enforcement agency;
- if we consider the disclosure necessary or appropriate to physical damage or financial loss;
- In connection with an investigation into fraudulent activity or other, current or future illegal activity;
- if we transfer all or part of our business or business assets (including in the event of a reorganisation, termination or liquidation of the business);
- for other legitimate interests justified by Holcim.

IV. OVERDRACHT VAN UW PERSOONSGEGEVENS

We transfer or may transfer your personal data to recipients located in countries other than the countries where the personal data was originally collected. Such countries may not have the same data protection laws as those of the country where you originally provided the personal data. In that case, we will implement appropriate safeguards, in accordance with the law, for your personal data regardless of the countries to which it is transferred.

If you are a resident of the European Economic Area and the GDPR applies to you, we may transfer your personal data to the following subsidiaries of Holcim:

Holcim subsidiary	Contact details subsidiary Holcim
Holcim Ltd	Holcim Ltd, Zürcherstrasse 156, 8645 Jona
Holcim Group Services Ltd	Grafenauweg 10, 6300 Zug, Switzerland
Holcim Technology Ltd	Im Schachen, Holderbank Aargau 5113 Switzerland
Holcim European Business Services	Protifašistických bojovníkov 11 040 01 Košice, Slovakia
2. Holcim IT EMEA	Albasanz 14 28037 Madrid, Spain
3. Holcim Services (South Asia) Limited	17th Floor, Phase I & II, Reliable Tech Park, Thane Belapur Road, Airoli, Navi Mumbai-400708 / India
4. Holcim Global Hub Services Private Limited	Level 3, Tower I, Phase II, Logitech Park, A.K. Road, Sakinaka, Andheri (E), Mumbai - 400072, India

V. DUUR VAN DE VERWERKING

We will retain your data for as long as reasonably necessary for the processing explained in this Privacy Policy. For example, your personal data will be retained during your relationship with Holcim and for a subsequent period necessary to ensure compliance with applicable law

VI. UW RECHTEN OMTRENT DE VERWERKING VAN UW PERSOONSGEGEVENS

Right of access	Allows you to obtain confirmation that your personal data are being processed by us and, if so, the
	relevant details of such processing activities and a copy of your personal data.
Right of improvement	Allows you to correct your personal data if incorrect.
Right of deletion	Allows you to delete your personal data in certain cases (e.g. if the data is no needed in relation to the purposes for which it was collected).
	Important! We will not be able to accommodate such in all cases, such as if the
	law forces us to keep data for a certain period of time, or if the data is necessary for a legitimate interest such as defending a right in court.
Right to limitation	Allows you to request that we do not use your personal data in any way except to it until another request from you is resolved, in particular: (i) you have requested a rectification of the data
	requested; (ii) you have opposed the deletion of the data in case of unlawful processing;
	(iii) you have asked us to provide you with certain information to defend a right in ;
	(iv) you have objected to the data processing.
Right of objection	Allows you to object to further processing of your personal data within the conditions and limitations
	determined by law.
	Important! The law forces us to respond to such requests only for direct marketing processing (e.g. if you receive emails with our information, you can unsubscribe). In other cases, we will weigh our interests and your specific situation to a final decision. So please explain
	why you object to the processing when you make such a request.
Right of transferability	Allows you to receive personal data concerning you that you have provided to us in a structured, common and machine-readable, or to transfer such data to another controller.
	Important! The law compels us to accede to such requests only for previously processed data based on your consent or on the performance of the contract concluded with us and only if
	the processing is carried out by automated means.

You can exercise your aforementioned rights and find out more about the processing of your personal data by a request to belgium.privacy@holcim.com.

You also have the right to lodge a complaint with the competent data protection authority; This

Privacy Policy is effective from June 2020.

We may amend this Privacy Policy from time to time, for example to keep it up to date or to comply with legal requirements or in case of changes in the way we run our business.