# Milliken & Company

## **Video Surveillance System Data Protection Notice**

#### I. Introduction

Milliken is committed to Processing Personal Data responsibly and in compliance with the applicable data protection laws in all countries in which Milliken operates. Please refer to the Milliken General Data Protection Policy for more information on definitions, our overall data protection principles and our approach to data protection compliance, which can be found at www.milliken.com/privacy.

This Video Surveillance System Data Protection Notice (the "Notice") applies to Personal Data that Milliken and its affiliated entities ("Milliken" or the "Company") collect and process.

Respecting privacy is fundamental to our relationship with our current, former and future/potential employees, as well as with all persons visiting and/or working within Milliken's premises (such as, but not limited to, visitors, independent contractors, directors, interns, advisors, temporary workers, service providers, clients, etc.).

The purpose of this Notice is to give you information about (i) the installation of video surveillance within Milliken's premises, (ii) what Personal Data Milliken collects as a result of this video surveillance, (iii) how Milliken uses, shares, transfers and discloses this Personal Data and why, (iv) how long your Personal Data is retained, (v) what your rights are and how to submit privacy and data protection inquiries and complaints, and (iv) which Milliken legal entity is responsible for compliance.

For any clarification or additional information you may need in order to fully understand this Notice or exercise your rights under this Notice, please contact the Milliken Data Protection Manager (or the DPO as may be required by applicable law) at Privacy@milliken.com.

## II. Cameras on Milliken's sites

Milliken operates a video surveillance system at its various sites. The cameras are generally located around the perimeter of the sites and at various appropriate locations around the site itself.

The cameras are located where all members of the public may be captured within the footage. Specific signage or notices are placed at the entrance of the premises under surveillance and at suitable locations around the site.

### III. What Personal Data We Collect, Use, Transfer And Disclose, And Why

Through the use of video surveillance, Milliken will collect the following information about you:

- Visual information which allows identification of those in the camera's area of coverage at a particular time ("Personal Data").
- Milliken does not collect and process sound recordings.

Milliken collects and processes the Personal Data in accordance with applicable data protection laws and only (i) for specified legitimate interests, (ii) to protect your interests or (iii) to comply with its legal obligations.

Milliken processes Personal Data for the following purposes and on the following legal basis:

- Health and safety: (i) to maintain and develop a safe and sound working environment, (ii) to
  ensure the safety and security of the persons within Milliken's premises, (iii) to protect the
  health and safety of employees and others working within Milliken's premises, (iv) the
  deterrence against and detection of any appropriate conduct at the work place, and (v) to
  monitor bulk deliveries and/or off loading of potentially hazardous materials in accordance
  with legal obligations.
- Protection of the equipment, goods and property of the company: (i) the deterrence against unlawful or unauthorized entry to Milliken's premises, (ii) the prevention against theft, burglary and fire, (iii) the deterrence against unlawful acts being committed within Milliken's premises, and (iv) to ensure that there are no breaches of confidentiality through removal of Milliken's property from the Premises.
- Control of the production process with regard to the machinery: to ensure the proper functioning of the machinery.
- Control of the production process with regard to the employees: to evaluate and improve the work organization and performance of employees.
- Investigations and legal procedures, to the extent allowed by applicable law: (i) to conduct investigations and manage internal complaints or claims, (ii) to pursue legal rights and remedies and (iii) to defend or institute legal claims.

The video surveillance within Milliken's premises is permanent for the purposes identified above to the extent allowed by applicable law.

Milliken will not use the Personal Data collected from video surveillance for any other purpose incompatible with the purposes described in this Notice, unless it is required or authorized by law, authorized by you, or is in your own vital interest (e.g., in the case of a medical emergency).

The video surveillance does not aim at collecting special categories of data, such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, or data concerning health or sexual orientation.

### III. Use and Transfer of Personal Data

Milliken will only grant access to Personal Data on a need-to-know basis and only for the purposes described in this Notice. This may include Milliken senior managers and their designees, personnel in HR, IT, Compliance and Legal.

We will transfer the Personal Data outside the European Economic Area ("EEA") to Milliken & Company and its global affiliates. We only transfer your Personal Data in order to protect our legitimate interests and your interests for any of the purposes indicated above, or to comply with legal obligations.

Such transfers will only take place to the extent necessary for these purposes and may include third parties such as service providers to facilitate or monitor the surveillance systems, or as required by applicable law.

Milliken will ensure that when Personal Data is transferred to countries that have different standards of data protection, appropriate safeguards to adequately protect the Personal Data are implemented to secure such data transfers in compliance with applicable data protection laws. Milliken has

implemented Data Transfer agreement based on EU model clauses to cover international data transfers and a copy of these agreements can be obtained by contacting the Milliken Data Protection Manager.

## **IV. Data Security**

Milliken is committed to maintaining the confidentiality, integrity, security and resilience of your Personal Data. To this effect, Milliken has implemented appropriate technical and organizational measures to protect Personal Data that are consistent with applicable data protection and privacy laws and regulations, including requiring our service providers to use appropriate measures to protect the confidentiality and security of Personal Data.

Milliken has developed various security policies and procedures to protect the data collected. These policies and procedures are available upon request from the Milliken Data Protection Manager at <a href="mailto:privacy@milliken.com">privacy@milliken.com</a>.

## V. Data Integrity and Retention

Milliken will take steps to ensure that the Personal Data processed is reliable for its intended use, and is accurate and complete for carrying out the purposes described in this Notice.

Milliken will not retain your Personal Data processed longer than allowed under the applicable data protection laws and, in any case, no longer than such Personal Data is necessary for the purposes for which it was collected or otherwise processed, subject to applicable local retention requirements. Standard retention periods will be 30 days (maximum of 90 days), unless shorter retention periods are applicable under local law. Some data may be extracted for further analysis in connection with a legal claim or investigation and therefore may be kept for a longer period. In such cases, the extracted data will be kept for as long as necessary in the context of legal claims.

## **VI. Data Protection Rights**

Under applicable data protection laws, you will benefit from the following rights. You can exercise these rights at any time by contacting the Milliken Data Protection Manager or DPO, where applicable:

- Right to access to, rectification and erasure of Personal Information;
- Right to restriction of Processing;
- Right to object to Processing;
- Right of data portability to the extent applicable;
- Right to withdraw consent where the Processing is based on consent; and
- Right to lodge a complaint with the supervisory authority.

### V. Miscellaneous

This Notice shall be effective as of 25 May 2018 and shall be applicable to all Milliken entities in the EU. This Notice may be revised and amended from time to time and appropriate notice about any amendments will be given.

Milliken is allowed to adapt the text of this Notice only in order to be compliant with local legislation by means of an addendum attached to this Notice. In case of any discrepancies between this Notice and a specific local addendum made in accordance with local law, the terms of the latter shall prevail.