

BUSINESS PARTNER DATA PROTECTION NOTICE

This Business Partner Data Protection Notice ("Notice") announced by Sika Limited (Vietnam) (herein after being called "SIKA"), explains the practices carried out by SIKA, as the Controller, regarding the collecting, processing of personal data relating to SIKA's current, former or potential vendors, customers, suppliers, and any other business partners (collectively, "Business Partners") and our Business Partners' employees.

Changes to the Notice may become necessary due to changes to our operational management or due to changes in legal requirements. We reserve the right to make such changes at any time upon necessary.

The Notice applies to you if you are

- a Business Partner of SIKA as an individual (e.g., a consultant or sole entrepreneur) or
- an employee of a Business Partner who interacts with Sika on such Business Partner's behalf.

The Notice governs the relationship between you and SIKA in relation to the Personal Data protection, including the following:

- Categories of Personal Data collected and method of collection;
- Purpose of collecting and processing your Personal Data;
- Method of processing your Personal Data;
- Recipients of Personal Data provided by SIKA; and
- Rights and obligations in relation to Personal Data collected by SIKA.

Article 1. Definitions

1. **Data Subject** means you, an individual who is reflected by Personal Data.

2. **Personal Data** means information in the form of symbols, scripts, notebooks, images, sounds or similar forms in the electronic environment attached to a specific person or helping to identify a specific person, including but not limited to, full name, date, month and year of birth; gender; nationality; photographs; phone number, identity card, citizen card; personal identification number, passport number; marital status; transactions information; information on family relationships (parents, siblings, spouses, children); history of activities in cyberspace; other sensitive Personal Data such as political and religious views; health status; ethnicity; salaries bonuses and benefit and other information that SIKA collects and processes when necessary.

3. **Data processing** means one or more activities affecting Personal Data, such as: collecting, recording, analyzing, confirming, storing, editing, publicizing, combining, accessing, retrieving, revoking, encrypting, decoding, copying, sharing, transmitting, supplying, transferring, deleting, and destruction of Personal Data or other related actions.

4. **Personal Data Controller and Processor** means SIKA that simultaneously decides on the purpose and means, and directly processes Personal Data in accordance with the Notice.

5. **Personal Data Processor** means an organization or individual that processes the Personal Data on behalf of SIKA, based on an agreement or a power of attorney entering into with SIKA.

6. **Third Parties** mean other individuals and/ or organizations which are not SIKA or the Data Subject.

Article 2. Legal basis for Personal Data to be collected and processed

SIKA relies on the following legal grounds for the processing of personal data:

- executing the contractual relationship with the Business Partner;
- legitimate interest of SIKA, SIKA'S affiliates or other third parties (such as governmental bodies or courts). The legitimate interest could be in particular group-wide information sharing, (direct) marketing activities, prevention of fraud or misuse of IT systems, physical security, IT and network security, internal investigations, enhancement of Sika's Business Partner management and administration, improvement of our product and service offerings or potential merger and acquisition activities;
- Compliance with legal obligations;
- Your consent, when the above legal bases do not apply;
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Article 3. Categories of Personal Data being collected and processed

1. To the appropriate extent and subject to the provision at your sole discretion and/or authorized third parties (e.g., your supervisor, public authorities or public resources), SIKA may collect and use the following personal data about you in compliance with applicable laws:

- Full name;
- Employer name;
- Business contact details (email, address, telephone and mobile);
- Content of communication and interaction (such as email or business letters);
- Job title / position;

- Payment and/or invoice information, and
- Marketing/newsletter preferences and your interaction behaviors with Sika's marketing activities (including by the use of e-mail trackers to measure click and opening rates) in case you consented to receiving marketing information from Sika.

2. The information collected and processed by SIKA above may change depending on changes in relevant regulations; guidelines, policies, decisions of SIKA and the relationship between SIKA and you.

Article 4. Method of Personal Data collection

SIKA collects and stores your Personal Data when you provide it to SIKA by:

- registering on SIKA's website, portal and/or application programs;
- creating and updating your profile(s) on above Sika platforms;
- sending us your data by e-mail or post;
- providing us with your data at fairs/ exhibitions or other events;
- receiving from other publicly available, public information sources or from social networking platforms (google, facebook, zalo ...) that you have posted and/or updated; and
- receiving from third-party information sources that you agree to allow to collect or sources where the collection of information is required or permitted by law (e.g. your employer; your supervisors, service providers, public authorities ...).

Article 5. Purpose of processing the Personal Data

1. Your Personal Data is collected, stored and processed for the purposes of.

- performing the contractual relationship with the Business Partner (including fulfilling contractual obligations, invoice processing, communication, and legal and compliance activities);
- (direct) marketing activities;
- enhancements to our Business Partner management and administration;
- improvements to our product and service offerings such as new training activities and events or adjusted product information, and/or;
- compliance, security and fraud prevention activities.

The provision of personal data is necessary for the purposes described above. If you do not provide the personal data, the affected Business Partner management and administration processes might be delayed or impossible.

2. SIKA processes your Personal Data for one or all of the purposes mentioned above depending on the nature, extent, relationship arising between SIKA and you. Except for cases where it is mandatory to process Personal Data in accordance with the law, you have the right to reject SIKA's processing Personal Data for one or more of the above purposes by submitting a request to SIKA using the contact details set out in this Notice. In case SIKA does not receive any request from you, by expressing your consent as mentioned in this Notice, SIKA understands that you voluntarily agree to allow SIKA to have full rights to process your Personal Data for all of the above purposes.

Article 6. Method of processing the Personal Data

1. Personal Data will be stored by SIKA and appropriate measures will be taken for security. Your Personal Data will be stored and processed wholly or partially in Vietnam. To the extent permitted by law, SIKA may transfer and store Personal Data abroad, including through cloud storage solutions. Retention of Personal Data is carried out for the period necessary to fulfill the purposes in this Notice. SIKA will only transfer your Personal Data abroad in accordance with the provisions of law on personal data protection.

2. If you access platforms provided by SIKA from a location outside Vietnam, such use constitutes your consent to the transfer of your data outside of that country/territory and sending them to Vietnam.

3. When you choose to provide, share and publish your Personal Data on SIKA's platform or in any other form, it means that you have agreed and authorized SIKA to share that information which fits for purposes provided herein.

4. In some circumstances, your Personal Data needs to be collected by Third Parties in accordance with the regulations, for example by competent authorities, or other service providers used by SIKA. The collection and processing of your Personal Data between you and these Third Parties will also have to comply with the regulations on personal data protection. Data Processors will be subject to contractual obligations to implement appropriate technical and organizational security measures to safeguard the Personal Data, and to process the Personal Data only as instructed.

5. Sika does not engage in any automated decision-making in the context of its Business Partners relationship.

Article 7. Organizations and individuals entitled to process your Personal Data

Any access to your personal data is restricted to those organizations and individuals that have a need to know, in order to fulfill their job responsibilities and data processors. Based on this principle, your Personal Data will be collected and processed by the following organizations and individuals:

1. SIKA, to the extent necessary, may share your Personal Data within the Sika Group companies, for internal administrative and for marketing purposes .

2. Sika may engage third party service providers, acting as processors, in order to provide IT, marketing and other administrative support (e.g., service providers who provide account payable support or IT hosting and maintenance support). Those service providers act as data processors of Sika and under the instructions of the same; they may have access to your personal data to the extent necessary to provide such services and in compliance with applicable data protection regulation.

3. Sika may also disclose your personal data as required or permitted by applicable law to governmental authorities, courts, arbitration centers, external advisors, and similar third parties.

4. The updated list of data processors and third parties that we share data with is available upon request to Sika and the DPO/DPC at the contact details below specified.

Article 8. Consequences and unexpected damages that are likely to occur

1. Processing Personal Data always carries the risk of data leakage and loss and can potentially cause unwanted consequences and damage. Sika recognizes the importance and responsibility of protecting Personal Data and therefore:

- a. commits to always comply with personal data protection principles, regulations related to your rights,
 - b. applies the appropriate protective measures in accordance with the applicable laws
 - c. regularly review and update the most optimal technical measures to ensure safety in the processing of Personal Data.
2. Sika will make maximum efforts to prevent risks and limit unwanted consequences and damages that may happen, protecting the legitimate rights and interests of you and Sika.

Article 9. Start time and end time of data processing and retaining

1. The time for your Personal Data collection and processing starts from the moment you successfully provide your data via methods stipulated in article 4 and ends upon the completion of processing data serving the purposes provided in this Notice or until you request to cancel or delete the information provided or request to withdraw consent or the Personal Data has been deleted in accordance with Sika's internal rules and the Vietnamese regulations.

2. Your Personal Data is stored by Sika and/or our service providers, to the extent necessary for the performance of our obligations and for the time necessary to achieve the purposes for which the information is collected, in accordance with applicable data protection laws. When Sika no longer needs to use your personal data to comply with contractual or statutory obligations, we will remove it from our systems and records and/or take steps to properly pseudonymize/anonymize it, so that you can no longer be identified, unless we need to keep your personal data to comply with legal or regulatory obligations to which Sika is subject, e.g. statutory retention periods.

Article 10. Rights of Data Subject

As the Data Subject, you have the following rights:

1. Right to know

You will be made aware of the processing of their Personal Data, unless otherwise provided for by law.

2. Right of consent

You may or may not agree to allow the processing of his or her your Personal Data, except for the cases where the consent of the data subject is not required, as below:

- a. In emergency cases, relevant Personal Data should be immediately processed to protect the life and health of data subjects or others.
- b. The disclosure of Personal Data in accordance with the provisions of law.
- c. The processing of data by competent state agencies in case of national security and national security emergencies, social order and safety, major disasters or dangerous epidemics; when there is a threat to national security or defence, but not to the extent of declaring a state of emergency; preventing and combating riots, terrorism, preventing and combating crimes and violations of law in accordance with the provisions of law.
- d. To perform the contractual obligations of the Data subject with relevant agencies, organizations and individuals in accordance with the provisions of law.
- e. To serve the operation of state agencies prescribed by the law on sectoral expertise.

3. Right to access

You are entitled to access to view, correct or request correction of your Personal Data, unless otherwise provided by law.

4. Right to withdraw consent

The Data subject is entitled to withdraw his/her consent, unless otherwise provided by law.

To perform a withdrawal of your Personal Data, you may contact Sika through the contact details provided in this Notice. The withdrawal will take effect 72 hours after the request is duly submitted to Sika and will not apply to the processing activities that took place prior to the withdrawal effective time.

5. Right to delete data

a. The Data subject is entitled to delete or request the deletion of their Personal Data, unless otherwise provided for by law. You can request the deletion of your Personal Data in the following cases:

- When you recognize that it is no longer necessary for the purpose for which the Personal Data was collected to consent

and accept the damages that may occur from the request for erasure of the data;

- *Withdrawing consent;*
- *Object to the processing of your Personal Data Controller, and SIKA has not legitimate reasons to continue the processing;*
- *Personal Data is being processed for the purposes different from the consent ones or the processing of Personal Data is a violation of the provisions of law;*
- *Personal Data must be deleted in accordance with the regulations of personal data protection.*

b. The data deletion, however, will not apply, at the request of the Data Subject in the following cases:

- *The law stipulates that data deletion is not allowed;*
- *Personal Data is processed by competent authorities for the purpose of serving their operation in accordance with the law;*
- *Personal Data has been made public in accordance with the law;*
- *Personal Data is processed to serve legal requirements, scientific research and statistics as prescribed by law;*
- *national defense and security, social order and safety, major disasters or dangerous epidemics; when there is a threat to national security or defence but not to the extent of declaring a state of emergency; prevention and prevention of riots, insanity, prevention of crime and violations of the law;*
- *Response to an emergency that threatens the life, health or safety of the data subject or another individual.*

c. To perform a deletion of your Personal Data, you may contact SIKA through the contact details provided in this Notice.

The deletion will take effect 72 hours after the request is duly submitted to SIKA, unless otherwise regulated by the laws.

d. SIKA will not restore Personal Data where:

- *The processing of data is for improper purposes;*
- *The purpose of the processing of Personal Data has been completed with the consent of the data subject;*
- *The storage of Personal Data is no longer necessary for the operation of SIKA;*
- *SIKA is dissolved or no longer operates or declares bankruptcy or has its business operations terminated in accordance with the Vietnamese regulations.*

6. Right to restrict data processing

You are entitled to requests to restrict the processing of your Personal Data, unless otherwise provided for by the law.

To perform a restriction of processing your Personal Data, you may contact SIKA through the contact details provided in this Notice. The restriction applicable to all the Personal Data that you request for the restriction will take effect 72 hours after the request is duly submitted to SIKA, unless otherwise regulated by the laws.

7. Right to be provided with your Personal Data

You may request SIKA to provide you with your Personal Data, unless otherwise provided by law.

To request for your Personal Data, you may contact SIKA through the contact details provided in this Notice. The provision of your the Personal Data will be completed within 72 hours after the request is duly submitted to SIKA, unless otherwise regulated by the laws.

SIKA has the right to refuse the request if (i) the provision of your Personal Data causes harm to national defense, national security, social order and safety or may affect the safety, physical or mental health of others; (ii) you do not agree to provide, allow the authorization or authorize the receipt of Personal Data.

8. Right to object to data processing

You are entitled to give an objection to SIKA to prevent or restrict the disclosure of your Personal Data or use it for advertising or marketing purposes, unless otherwise provided for by law.

SIKA will comply with your request within 72 hours after receiving the request is duly received by SIKA, unless otherwise provided for by law.

9. Right to complain, denounce and initiate lawsuits

You have the right to lodge complaints, denunciations, or initiate lawsuits in accordance with law.

10. Right to claim damages

You have the right to claim damages in accordance with the law when there is a violation of the provisions of this Notice performed by SIKA, unless otherwise agreed by the parties or otherwise provided for by law.

11. Right to self-protection

You have the right to self-protection in accordance with the Vietnamese Civil Code, other relevant laws and decrees, or request competent authorities and organizations to take measures to protect civil rights in accordance with the regulations.

Article 11. Obligations of Data Subjects

As the Data Subject, you are obliged to:

- 1. Protect your Personal Data; request other relevant organizations and individuals to protect your Personal Data.*
- 2. Respect and protect the Personal Data of others.*
- 3. Provide complete and accurate Personal Data when agreeing to allow the processing of Personal Data.*
- 4. Notify, update, and supplement your Personal Data promptly, completely, and accurately to SIKA in accordance with the purposes you have agreed in this Notice.*

5. Participate in propagating and disseminating skills to protect personal data.
6. Implement the provisions of the law on personal data protection and participate in preventing and combating violations of regulations on personal data protection.
7. Notify SIKA immediately if you discover or come to your awareness or suspect that your Personal Data has been exposed, which may lead to risks during service use, or any violation of Personal Data protection provisions of the Notice.
8. Regularly check SIKA platforms for updates and comply with any changes (if any) related to the Personal Data protection policy in this Notice.
9. Other obligations as prescribed by law.

Article 12. SIKA's contact details

If you have any concerns or questions about this Notice or any requests relating to your Personal Data protection, please contact Sika Limited (Vietnam) with the following details:

SIKA LIMITED (VIETNAM)

Address: 10th Street, Nhon Trach 1 Industrial Zone, Nhon Trach District · 810000 Dong Nai · Vietnam

Phone: +84 251 356 0700 · Fax: +84 251 356 0699

Email: privacy@vn.sika.com

Article 13. Consents and commitment of Data Subject

1. Upon the confirmation of consent of this Notice by the Business Partner, it is understood that the Business Partner and its employees agree to the collection, processing and use of the information provided for the purposes described here. The legal basis of the processing of the Personal Data is the given consent voluntarily and without deception or coercion.
2. Processing Personal Data as described in the Notice is partly a statutory requirement, partly a contractual requirement under the business contract. Providing Personal Data is necessary for the activities that are functional to management of business relationship and compliance with applicable laws. Not providing the Personal Data may prevent SIKA from implementing the contract with the Business Partner and may lead to the termination thereof.
3. You can withdraw your consent any time. Please note that the withdrawal only applies to the future. Processing that took place prior to the withdrawal shall not be affected thereby.
4. In case you provide Personal Data of a third party to SIKA (including but not limited to information about contact person and/or other organizations or individuals), you commit to have obtained the legal authorization from such third party to provide and process his/her Personal Data in accordance with the provisions of laws and the third party is aware of and agrees to all the contents of this Notice, including information that SIKA is a Personal Data Controller and Processor in accordance with the purposes stipulated in this Notice, and SIKA will be completely exempted from any liabilities in this case.
5. Personal Data will be transmitted over the internet. The internet is open everyone, and security of such means of transmission can never been guaranteed by any organizations/ individuals. Subject to mandatory legal provisions SIKA is not liable for any injury, loss or damage incurred by you or a third party as a result of any error, delay or failure of Information transmission via the internet.

By clicking the “Submit” button following our instruction, accepting the cooperation/ communication with SIKA, you confirm that the Personal Data provided is true and accurate and does not contain any misleading statements or omissions and voluntarily agree to this Notice's contents and to the collection, processing of the Personal Data you provide in accordance with the Notice.