



GDPR Privacy Statement

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1.1 WHO DOES THIS GDPR PRIVACY STATEMENT APPLY TO?

EOC Group (“**EOC Group**”, “**the Company**” or “**We**”) is a multi-national chemical group headquartered in Belgium. We are a leading company in the production and distribution of compounds, latices, emulsions, adhesives, surfactants and polyurethanes.

EOC Group has seven divisions with production and distribution units all over the world. Our group consists of several companies (“**the EOC Companies**”) that process personal data:

- EOC MANAGEMENT ASIA PACIFIC PTE LTD Address: 38 Beach Road South Beach Tower
- EOC BELGIUM NV Address: p/a Industriepark De Bruwaan 12 B-9700 Oudenaarde
- EOC BELGIUM - DUBAI BRANCH Address: PO 261341 UAE-Jebel Ali Free Zone
- EOC LOGISTICS Address: Industriepark De Bruwaan 18 B-9700 Oudenaarde
- EOC MANAGEMENT Address: Industriepark De Bruwaan 12 B-9700 Oudenaarde
- EOC SURFACTANTS Address: p/a Industriepark De Bruwaan 12 B-9700 Oudenaarde
- EOC POLYMERS (CHINA) CO., LTD Address: 58 Luogong Road, Chemical Industrial Park CN-Shanghai 201507
- EOC POLYMERS INDIA PVT Address: 474 B HSIIDC Industrial Estate Berhi Phase - IN-131 101 Sonapat
- EOC INDIA POLYMERS PVT. LTD Address: Plot no.833, jhagadia Industrial estate,GIDC, Opp.Gujarat gas , Near Getco Substation, Jhagadiya, Bharuch,Gujarat , India-393110
- EOC TAILOR MADE POLYMERS INDIA , LTD Address: The Paragon, 1st Floor, Block 19, Dhanraj Mills Compound, S.J.Road, Lower Parel(W),ID-Mumbai 400013
- EOC ITALIA - BRANCH OF EOC BELGIUM Address: Via Famiglia Iona, 25 IT-13100 Vercelli
- EOC NEDERLAND - BIJKANTOOR VAN EOC BELGIUM Address: Fokkerstraat 24 NL-7903 AP Hoogeveen
- EOC POLAND - BRANCH OF EOC BELGIUM - SPOLKA AKCYJA ODDZIAL W POLSCE Address: Luczynow 98c PL-26-900 Kozienice
- EOC PORTUGAL - BRANCH OF EOC BELGIUM - SURCURSAL EM PORTUGAL Address: R. Mestre J.A. Martinho 1 PT-7300-062 Portalegre
- EOC EINKAUF AG Address: Alte Steinhauserstrasse 33 CH-6330 Cham

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- EOC SPAIN - BRANCH OF EOC BELGIUM - SUCURSAL EN ESPAÑA Address: Poligono 7 Parc. 299 ES - 46593 Algar de Palancia
- EOC POLYMERS THAILAND CO., LTD Address: 4 Moo 8, Rayong Industrial Park Highway 3191, tambon mab kha King Amphur Nikompattana TH-Rayong 21180
- EOC TURKIYE - BRANCH OF EOC BELGIUM - BELCIKA TURKIYE Address:TEKIRDAG CERKEZKOYGazi Osman Pasa Mah. 95 SK 18 TR-59500 Cerkezkoy - Tekirdag
- EOC UK Address: Tenax Road, Trafford Park UK-M17 1JT Manchester

This GDPR Privacy Statement applies to the processing of personal data:

- by all EOC companies established in the European Union, regardless of whether the processing takes place in the Union or not;
- by all EOC companies established outside the European Union, insofar as they process personal data of data subjects who are in the Union in the framework of:
 - the offering of goods or services to such data subjects in the Union;
 - the monitoring of their behaviour as far as their behaviour takes place within the Union.

All EOC Companies are separate and independent legal entities. Depending on the processing activity in the context of which your personal data are processed, they may be qualified as a separate data controller or a joint controller with one or more of the other EOC Companies. None of the EOC companies have any liability for the other EOC Companies' acts or omissions.

We want to be a great company. In order to achieve that goal we are committed to work in the right way. We are committed to protect your privacy and to process your personal data in an open and transparent manner, in particular with respect of the General Data Protection Regulation 2016/679 of 27 April 2016 ("GDPR").

1.2 **WHAT IS COVERED BY THIS GDPR PRIVACY STATEMENT?**

With this GDPR Privacy Statement we would like to inform you about why and how we process your personal data when we perform our business activities or when you use our websites (i.e. www.eocgroup.com) and any of the services we offer through our websites, who we give that information to, what your rights are and who you can contact for more information or queries.

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Our website may link to other sites provided by other affiliated companies/entities or by third parties. Whilst we try to link only to websites that share our high standards and respect for privacy, we are not responsible for the content or the privacy practices of other websites.

When linking to any such sites, we strongly recommend you review the GDPR Privacy Statements on these sites, before disclosing any personal information.

1.3 WHY WE USE YOUR DATA?

1.3.1 I AM A WEBSITE VISITOR

We only process your personal data for legitimate business reasons. These purposes include, but are not limited to:

- dealing with enquiries, requests and complaints (e.g. sent via the online “contact us” form);
- spontaneous applications;
- gathering statistics about the use of the website (“*web audience measuring*”);
- improving the website’s performance and design.

1.3.2 I AM (A CONTACT PERSON OF) A SUPPLIER, A CUSTOMER OR A PROSPECT OR ANY OTHER INDIVIDUAL WHOSE PERSONAL DATA ARE PROCESSED (E.G. A VISITOR, A BUSINESS CONTACT ETC.)

We only process your personal data for legitimate business reasons. These purposes include, but are not limited to:

- respecting our legal obligations;
- customer and supplier management;
- consumer and visitor management;
- order and supply management;
- invoicing and accounting;
- the provision of information on our company, services and activities;
- the good organisation of our services;
- marketing and sales;
- dealing with enquiries, requests and complaints;
- dispute management;
- public relations and press contacts;
- statistics and market research;

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- access control.
- security.

1.4 THE LEGAL GROUNDS FOR PROCESSING YOUR DATA

1.4.1 I AM A WEBSITE VISITOR

When you send a message via the online “contact us” form, your personal data will in principle be processed for the purposes of our legitimate interests (namely the interest to handle all enquiries, requests and complaints sent via this form in the best possible way).

When you send a message via the online “spontaneous application” form, your personal data will in principle be processed for the purposes of your application. See the additional policy on this page.

Before relying on legitimate interests, we will always determine case by case whether our interests are not overridden by your interests, fundamental rights and freedoms.

1.4.2 I AM (A CONTACT PERSON OF) A SUPPLIER, A CUSTOMER OR A PROSPECT OR ANY OTHER INDIVIDUAL WHOSE PERSONAL DATA ARE PROCESSED (E.G. A VISITOR, A BUSINESS CONTACT ETC.)

We process your personal data for the purposes mentioned above:

- when necessary for the performance of contracts to which you are party or in order to take steps at your request prior to entering into a contract.
- when necessary for compliance with our legal obligations.
- for the purposes of the legitimate interests of the Company and/or of a third party, including (but not limited to) our business activities, customer, and supplier management, etc. In this respect, we will always determine case by case whether our interests are not overridden by your interests, fundamental rights and freedoms.

If we have the legal obligation to obtain your free, informed, specific and unambiguous consent to process your personal data for certain purposes (e.g., specific direct marketing or market research activities), we will only process your data for such purposes to the extent that we have obtained such consent from you.

1.5 YOUR RIGHTS

You have several rights concerning the information we hold about you. We would like to inform you that you have the right to:

- obtain confirmation that we are processing your personal data and request a copy of the personal data we hold about you.
- ask that we update the personal data we hold about you or correct such personal data that you think is incorrect or incomplete.

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- ask that we delete personal data that we hold about you or restrict the way in which we use such personal data if you believe that there is no (longer a) lawful ground for us to process it.
- withdraw consent to our processing of your personal data (to the extent such processing is based on consent).
- receive a copy of the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and to transmit such personal data to another party (to the extent the processing is based on consent or a contract).
- object to our processing of your personal data for which we use legitimate interest as a legal basis, in which case we will cease the processing unless we have compelling legitimate grounds for the processing.

You also have the right to object at any time to the processing of personal data for direct marketing. If you do not want to continue receiving any direct marketing from us, you can contact us (see below). In that event, the personal data shall no longer be processed for such purposes.

To exercise any of your rights, you can send us a request, indicating the right you wish to exercise:

- by e-mailing us at edp@eocgroup.com; or
- by addressing your query to EOC – ICT department, IP De Bruwaan 12, 9700 Oudenaarde (Belgium).

You may also use these contact details if you wish to make a complaint to us relating to your privacy.

If you are unhappy with the way we have handled your personal data or any privacy query or request that you have raised with us, you have a right to complain to the Data Protection Authority (“DPA”) in your jurisdiction. If you would like to be directed to the appropriate DPA, please contact us.

1.6 HOW WE OBTAIN DATA

1.6.1 I AM A WEBSITE VISITOR

We may obtain your personal data when you use the website and its services. This may be for instance the case when you fill in the “contact us” form on the website, etc.

1.6.2 I AM (A CONTACT PERSON OF) A SUPPLIER, A CUSTOMER OR A PROSPECT OR ANY OTHER INDIVIDUAL WHOSE PERSONAL DATA ARE PROCESSED (E.G. A VISITOR, A BUSINESS CONTACT ETC.)

We may obtain your personal data in the framework of the execution of our business activities.

We may obtain such personal data because you give them to us (e.g., by contacting us, by completing online forms, ...), because others give them to us (e.g., your employer or third-party service providers that we use in the framework of our business activities) or because they are publicly available.

When we obtain personal data from external parties, we make reasonable efforts to enter contractual clauses with these parties obliging them to respect the data protection legislation. This can be done by obliging this

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party to provide you with all necessary information or - if necessary - to obtain your consent for processing the personal data as described in this GDPR Privacy Statement.

1.7 DATA WE COLLECT

1.7.1 I AM A WEBSITE VISITOR

On our website, you have the possibility to contact us by completing the “contact us” form. The following data are collected through this form: first and last name, e-mail address, phone number, fax number (optional), company name (optional), subject and message.

When you send a message via the online “spontaneous application” form, your personal data we collect in this form: Job, first and last name, address, e-mail address, phone number, mobile number; experiencecv (optional), message (optional), uploaded cv (optional).

1.7.2 I AM (A CONTACT PERSON OF) A SUPPLIER, A CUSTOMER OR A PROSPECT OR ANY OTHER INDIVIDUAL WHOSE PERSONAL DATA ARE PROCESSED (E.G. A VISITOR, A BUSINESS CONTACT ETC.)

The personal data that we collect or obtain may, among other things, include:

- Identification data (e.g. name, address (private/work), phone number (private / work), e-mail address (private / work), ...);
- electronic identification data (e.g. IP addresses, browser type, cookie identifiers, ...);
- personal characteristics (e.g. age, gender, date of birth, place of birth, nationality, language, family composition, hobby's, etc.);
- financial specifics (e.g. bank account number, creditworthiness, ...);
- life style and social circumstances;
- family circumstances (e.g. marital status);
- employment and educational data (e.g. organization you work for, job title, current responsibilities, projects, qualifications, trainings, work scheme...);
- data about which products and services you order;
- camera surveillance records;
- data about how you interact with us (e.g. when you contact us) and other similar information;
- Car license plate number.

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1.8 DISCLOSURES

We may disclose your personal data to affiliated companies, third parties that provide services to us that reasonably require access to personal data relating to you for one or more of the purposes outlined in the “Why we use your data” section above. The following external parties may for instance be involved:

- external service providers we rely on for various business services.
- law enforcement authorities in accordance with the relevant legislation
- external professional advisors (e.g., attorneys or consultants of the company).

If our business enters a joint venture with or is sold to or merged with another business entity, your information may be disclosed to our new business partners or owners.

Please note that some of the recipients of your personal data referenced above may be based in countries outside of the European Economic Area whose laws may not provide the same level of data protection.

Below please find a list of possible countries to which your personal data may be transferred and - if possible - the appropriate safeguards taken to process your personal data in accordance with the data protection legislation:

Name data importer located outside of the EEA	Countries outside of the EEA	Relevant GDPR article permitting the transfer and the corresponding mechanism ¹
EOC Einkauf	Switzerland	Adequacy decision under Article 45

In general, we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this GDPR Privacy Statement.

We reserve the right to disclose your personal information as required by law, or when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, request from a regulator or any other legal process served on us.

¹ Relevant possibilities: **(1)** Adequacy decision under Article 45; **(2)** Binding corporate rules under Article 47; **(3)** Standard data protection clauses under Article 46.2; **(4)** Contractual clauses authorised by the competent supervisory authority under article 46.3; **(5)** Approved code of conduct under article 46.2; **(6)** Approved certification mechanism under article 46.2; **(7)** Derogations under Article 49, more specifically data subject consent; **(8)** Derogations under Article 49, more specifically necessary for the performance of a contract or the implementation of pre-contractual measures taken at the data subject's request; **(9)** Derogations under Article 49, more specifically necessary for a contract concluded in the interest of the data subject between CCEP and another natural or legal person; **(10)** Derogations under Article 49, more specifically necessary for important reasons of public interest; **(11)** Derogations under Article 49, more specifically necessary for the establishment, exercise or defence of legal claims.

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1.9 COOKIES

This website uses Cookies. Cookies are small text files that are stored by your browser onto your computer or mobile device when you visit this website.

They are used to provide you with a good experience when you browse this website and allow us to improve this website. With your consent, they can also be used to personalize the content of this website based on your previous browsing behavior and to gather statistics to improve this website.

You can find more information about cookies by visiting the following website: www.allaboutcookies.org.

You can enable, disable and/or delete cookies as you wish. You can delete all cookies that are already on your device and you can set most browsers to prevent them from being placed.

The ability to enable, disable and/or delete cookies can be completed at browser level. These settings are usually found in the “options” or “preferences” menu of your internet browser. To understand these settings, the following links may be helpful. Otherwise, you should use the “Help” option in your internet browser for more details:

[Cookie settings in Internet Explorer](#)

[Cookie settings in Firefox](#)

[Cookie settings in Chrome](#)

[Cookie settings in Safari](#)

1.10 SECURITY OF YOUR DATA

We employ strict technical and organizational (security) measures to protect your information from access by unauthorized persons and against unlawful processing, accidental loss, destruction and damage both online and offline.

These measures include:

- training to relevant staff to ensure they are aware of our privacy obligations when handling personal data.
- administrative and technical controls to restrict access to personal data on a ‘need to know’ basis (passwords, digital certificates);
- technological security measures, including firewalls, encryption, and anti-virus software.
- physical security measures, such as staff security badges and number codes to access our premises.
- Camera surveillance systems.

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Although we use appropriate security measures once we have received your personal data, the transmission of data - especially over the internet (including by e-mail) - is never completely secure. We endeavor to protect personal data, but we cannot guarantee the security of data transmitted to us or by us.

We limit access to your personal information to those who we believe reasonably need to come into contact with that information in order to carry out their jobs.

1.11 DATA RETENTION

1.11.1 I AM A WEBSITE VISITOR

Your personal data will not be retained longer than necessary for the purposes described above.

As a rule, personal data obtained through the contact form on our website is stored for a period of 5 years.

Depending on the specific situation and the applicable national legislation, we may, however, retain your personal data for a longer period. This will be the case if any of the following periods is longer: (i) as long as is necessary for our daily business; (ii) any retention period that is required by law; or (iii) the end of the period in which litigation or investigations might arise.

For more information about the expiry dates of the cookies used on this Website, please consult the cookie section.

1.11.2 I AM (A CONTACT PERSON OF) A SUPPLIER, A CUSTOMER OR A PROSPECT OR ANY OTHER INDIVIDUAL WHOSE PERSONAL DATA ARE PROCESSED (E.G. A VISITOR, A BUSINESS CONTACT ETC.)

Your personal data will not be retained longer than necessary for the purposes described above.

As a general rule, records in the framework of our business activities that may contain personal data (e.g. contracts, orders, correspondence etc.) are stored for a period of 10 years.

Personal data processed for direct marketing purposes are however stored for a period of 3 years as from the last contact with the individual concerned. If you have become a customer during this period, we may however retain your personal data for a longer period, namely 10 years as from the delivery of the products or services, or as from the latest contact with EOC Group (if this contact would take place at a later date).

Depending on the specific situation and the applicable national legislation, we may, however, retain your personal data for a longer period. This will be the case if any of the following periods is longer: (i) as long as is necessary for our daily business; (ii) any retention period that is required by law; or (iii) the end of the period in which litigation or investigations might arise.

1.12 AUTOMATED DECISION-MAKING

Automated decisions are defined as decisions about individuals that are based solely on the automated processing of data and that produce legal effects that significantly affect the individuals involved.

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As a rule, your personal data will not be used for automated decision-making. We do not base any decisions about you solely on automated processing of your personal data.

1.13 HOW TO CONTACT US?

We hope that this GDPR Privacy Statement helps you understand, and feel more confident about, the way we process your data. If you have any further queries about this GDPR Privacy Statement and this website in general, please contact us:

- by e-mailing us at edp@eocgroup.com; or
- by calling us +32(0)55/23.58.70; or
- by addressing your query to EOC – ICT department, IP De Bruwaan 12, 9700 Oudenaarde. (Belgium).

1.14 CHANGES TO THIS GDPR PRIVACY STATEMENT

We may modify or amend this GDPR Privacy Statement from time to time. Any changes we may make to this GDPR Privacy Statement in the future will be posted on this page. To let you know when we make changes to this GDPR Privacy Statement, we will amend the revision date at the top of this page. The new modified or amended GDPR Privacy Statement will apply from that revision date. Please check back periodically to see changes and additions.

If we are in possession of your e-mail address and we are still processing your personal data, we will also inform you electronically about all changes to this GDPR Privacy Statement.

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