

EASTMAN
EMPLOYEE FAIR PROCESSING NOTICE
(“NOTICE”)

1. What is this document and why should you read it?

This privacy notice explains how and why Eastman Chemical Company including each of its operating entities (also referred to as “Eastman”, “we”, “our” and “us”) uses **personal data about** its employees, staff, contractors, trainees, officers, consultants, and temporary or agency workers (referred to as “you”).

Schedule 0 as per the link below lists the names of the relevant Eastman entities which may be controlling personal data and for which the same privacy notice applies.

<https://www.eastman.com/schedule0>

You should read this notice, so that you know what we are doing with your personal data. Please also read any other privacy notices that we give you, that might apply to our use of your personal data in specific circumstances in the future.

This notice does not form part of your contract of employment or any other contract to provide services.

2. **Eastman’s data protection responsibilities**

“Personal data” is any information that relates to an identifiable natural person. Your name, address, contact details, salary details and CV are all examples of your personal data, if they identify you.

The term “process” means any activity relating to personal data, including, by way of example, collection, storage, use, consultation and transmission.

Eastman is a so-called “controller” of your personal data. This means that we make decisions about how and why we process your personal data and, because of this, we are responsible for making sure it is used in accordance with data protection laws.

3. What types of personal data do we collect and where do we get it from?

We collect many different types of personal data about you for lots of reasons. We cannot administer our **employment or other relationship with you without your personal data. Where we don’t need your personal data**, we will make this clear, for instance we will explain if any employment forms you are required to complete are optional and can be left blank.

Further details of the personal data we collect, where we get it from and what we do with it are set out in Schedule 1.

You provide us with personal data when you apply for a job with us, when you complete our employee information forms, correspond with us and in the course of performing your job. We also obtain some personal data from other sources, and create some personal data ourselves.

As set out in the table at Schedule 1, we collect your personal information from you directly and sometimes we obtain it from other people and organizations, including some public sources, such as publicly available directories and online resources, your emergency contacts, your use of Eastman provided assets, systems and platforms, your line manager and co-workers, your dependants and beneficiaries, and third-party benefits providers.

Due to the type of business undertaken by Eastman, we also conduct background checks on our employees. Depending on the job role, these checks can relate to any criminal convictions that you may have and include those checks that are required by applicable law and those required for our own policy compliance. Please see also the **section below in relation to ‘Sensitive Information’**.

If any of the personal information you have given to us changes, such as your contact details, please go to Benefits, Health, and Money on MyEastman (US Only), contact a local Human Resource representative, or inform us by contacting the Privacy Office at privacy@eastman.com.

4. What do we do with your personal data and why?

We process your personal data for particular purposes in connection with your employment or engagement with us, and the management and administration of our business.

We are required by law to always have a so-called **"lawful basis"** (i.e. a reason or justification) for processing your personal data. The table at Schedule 2 sets out the different purposes for which we process your personal data and the relevant lawful basis on which we rely for that processing.

We have a fiduciary duty and are obliged to protect our assets and employees. To accomplish this, we may use various monitoring techniques based upon several factors:

- (a) Your access to sensitive or privileged Company information;
- (b) You are under reasonable suspicion of a crime or **violation of Eastman's** Code of Business Conduct; or
- (c) Changes in your employment status that would justify and warrant processing (departing Eastman e.g.); or
- (d) You have an approved IT security exception (like a USB exception).

Monitoring may include the evaluation of network traffic on Eastman networks and the recording of screen activity on Eastman administrated devices. Screen recording includes the creation of a video of all activity performed by a user on an Eastman device. This may include web browsing activity, file creation and editing, email communication, and chat interactions. Video evidence is evaluated based upon alert conditions. For example, if a user plugs in a USB device, an alert is triggered, and the video is examined. All review activity of video evidence is itself recorded to prevent misuse. Videos are purged from the system in accordance to the data retention policy. Web cameras and video of the user themselves is not recorded.

Furthermore, our network activity is constantly being logged and evaluated to prevent malware and cyber security incidents.

Please note that where we have indicated in the table at Schedule 2 that our processing of your personal data is either:

- (a) necessary for us to comply with a legal obligation; or
- (b) necessary for us to take steps, at your request, to potentially enter into an employment contract with you, or to perform it,

if you choose not to provide the relevant personal data to us, we may not be able to enter into or continue our contract of employment or engagement with you.

We may also convert your personal data into statistical or aggregated form to better protect your privacy, or so that you are not identified or identifiable from it. We may use it to conduct research and analysis, including to produce statistical research and reports. For example, to help us understand how many of our total workforce number are on secondments at any given time.

5. Sensitive Information

Some of the processing described in the table at Schedule 2 **will include the processing of 'special categories of personal data' and/or sensitive personal data (together, "Sensitive Information")**. This refers to sensitive or special categories of personal data for which applicable laws require us to process with more care.

The table at Schedule 3 sets out the different purposes for which we process your Sensitive Information and the relevant lawful basis on which we rely for that processing. For some processing activities, we consider that more than one lawful basis may be relevant – depending on the circumstances.

6. Who do we share your personal data with, and why?

Sometimes we need to disclose your personal data to other people.

Inside Eastman's Group:

We are part of the Eastman group, which includes a number of companies and operations globally. Therefore, we will need to share your personal data with other companies in the Eastman group for our general business and workforce management purposes and, in some cases, to meet our customer needs where working across offices/locations, for line management, authorizations/approvals with relevant decision makers, reporting and where systems and services are provided on a shared basis. For example, your business contact details will be available to colleagues throughout the group.

Access rights between members of the Eastman group are limited and granted only on a need to know basis, depending on job functions and roles.

Where any Eastman group companies process your personal data on our behalf (as our processor), we will make sure that they have appropriate security standards in place to make sure your personal data is protected and we will enter into a written contract imposing appropriate security standards on them.

Outside Eastman's Group:

From time to time we may ask third parties to carry out certain business functions for us, such as the administration of our payroll and our IT support. These third parties will process your personal data on our behalf (as our processor). We will disclose your personal data to these parties so that they can perform those functions. Before we disclose your personal data to these third parties, we will seek to ensure that they have appropriate security standards in place to protect your personal data and we will enter into a written contract imposing appropriate security standards on them. Examples of these third-party service providers include service providers and/or sub-contractors, include our outsourced payroll, HR and marketing service providers, and our IT systems software and maintenance, back up, and server hosting providers.

In certain circumstances, we will also disclose your personal data to third parties who will receive it as controllers of your personal data in their own right for the purposes set out above, where the relevant disclosure is:

- (a) if we buy or sell our business (or part of it) in connection with a share or asset sale, we may disclose or transfer your personal data to the prospective seller or buyer and their advisors; and
- (b) if we need to disclose your personal data in order to comply with a legal obligation, to enforce a contract or to protect the rights, property or safety of our employees, customers or others.

We have set out below a list of the categories of recipients with whom we are likely to share your personal data:

- (i) employment-related benefits providers and other third parties in connection with your benefits (such as pension trustees);
- (ii) customers or clients of Eastman (for example, when tendering for work);
- (iii) consultants and professional advisors including legal advisors and accountants;
- (iv) courts, court-appointed persons/entities, receivers and liquidators;
- (v) business partners and joint ventures;
- (vi) trade associations and professional bodies;
- (vii) insurers; and
- (viii) governmental departments, statutory and regulatory bodies.

7. Where in the world is your personal data transferred to?

As part of a global organization, Eastman may transfer your personal data to recipients (either internally or externally, as set out above) that are established in jurisdictions other than your own. Please be aware that the data protection laws in some jurisdictions may not provide the same level of protection to your personal data as is provided to it under the laws in your jurisdiction.

If any disclosures of personal data referred to above require your personal data to be transferred, we will only make that transfer if:

- (a) the country to which the personal data is to be transferred ensures an adequate level of protection for personal data;
- (b) we have put in place appropriate safeguards to protect your personal data, such as an appropriate contract with the recipient;
- (c) the transfer is necessary for one of the reasons specified in data protection legislation, such as the performance of a contract between us and you; or
- (d) you explicitly consent to the transfer.

8. How do we keep your personal data secure?

We will take specific steps (as required by applicable data protection laws) to ensure we take appropriate security measures to protect your personal data from unlawful or unauthorised processing and accidental loss, destruction or damage.

9. How long do we keep your personal data for?

If you are our employee we will keep your personal data during the period of your employment and then, after your employment with us ends, for as long as is necessary in connection with both our and your legal rights and obligations. This may mean that we keep some types of personal data for longer than others.

We will only retain your personal data for a limited period of time. This will depend on a number of factors, including:

- (a) any laws or regulations that we are required to follow;
- (b) whether we are in a legal or other type of dispute with each other or any third party;
- (c) the type of information that we hold about you; and
- (d) whether we are asked by you or a regulatory authority to keep your personal data for a valid reason.

Any personal data contained in any work-related correspondence or records may be retained for longer, dependant on the retention period of the file that your personal data is held on.

For more information on our data retention practices, please refer to the Eastman Records Management Program (<https://eastmanchemical.policytech.com/dotNet/documents/?docid=345>).

10. What are your rights in relation to your personal data and how can you exercise them?

You have certain rights, which are briefly summarised at Schedule 4, in relation to any personal data about you which we hold.

Where our processing of your personal data is based on your consent (please see Schedules 2 and 3), you have the right to withdraw your consent at any time. If you do decide to withdraw your consent we will stop processing your personal data for that purpose, unless there is another lawful basis we can rely on – in which case, we will let **you know. Your withdrawal of your consent won't impact any of our processing up to that point.**

Where our processing of your personal data is necessary for our legitimate interests (please see Schedule 2), you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which legitimately overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.

If you wish to further understand or exercise any of these rights, please contact a local Human Resource representative or the Privacy Office at privacy@eastman.com.

11. Updates to this notice

We may update this notice from time to time to reflect changes to the type of personal data that we process and/or the way in which it is processed. We encourage you to check this notice on a regular basis.

12. Where can you find out more?

If you want more information about any of the subjects covered in this privacy notice or if you would like to discuss any issues or concerns with us, please contact a local Human Resource representative or the Privacy Office at privacy@eastman.com.

SCHEDULE 1

CATEGORIES OF PERSONAL DATA

Type of personal data	Collected from
1. Contact Information	
<ul style="list-style-type: none"> • Name(s) • Address(es) • Email address(es) • Contact details including mobile telephone number(s) 	<ul style="list-style-type: none"> • You
2. Personal Information	
<ul style="list-style-type: none"> • Contact information (see above), as relevant • Date of birth • Gender • Next of kin or other dependants • Marital or relationship status • Emergency contact information 	<ul style="list-style-type: none"> • You
3. Identity and Background Information	
<ul style="list-style-type: none"> • Contact information (see above), as relevant • Details of education and qualifications and results • Career history, experience and skills • Passport information • Driving licence information • Right to work, residency and/or other visa information (where unrelated to your race or ethnicity) • Curriculum Vitae (CV) or resume • Educational certificates or other qualification evidence • Image or photographs • Application form • Evaluative notes and decisions from job interviews • Preferences relating to job location and salary • Conflicts of interests (including where related to family networks) • Background checks relating to employment history, credit information, social media, and criminal records (see also Sensitive Information) 	<ul style="list-style-type: none"> • You • Recruitment consultants and agencies • Your previous employers • Publicly available information from online resources
4. Financial Information	
<ul style="list-style-type: none"> • Contact information (see above), as relevant • Bank account details • Salary, compensation and other remuneration information • National insurance number and/or other governmental identification numbers • Tax codes • Business expense and reimbursement details • For applicable employees, long-term incentive plans including company stock options, and company sponsored benefit plans 	<ul style="list-style-type: none"> • You • Your previous employer

Type of personal data	Collected from
5. Sensitive Information (where required or applicable locally)	
<ul style="list-style-type: none"> • Contact information (see above), as relevant • Racial or ethnic origin (including your nationality and visa information) • Religious or philosophical beliefs • Trade union membership • Data concerning physical and/or mental health (including occupational health requirements, accident reports, day-to-day health concerns such as diabetes or epilepsy conditions which we should be aware of, dietary requirements, allergies, drug and alcohol test results and reasons for any short term or long term absence) • Sexual orientation • Health and safety and accident records and reports • Information relating to actual or suspected criminal convictions and offences 	<ul style="list-style-type: none"> • You • Your emergency contact(s) • Your use of Eastman security control systems
6. Employment Administration Information	
<ul style="list-style-type: none"> • Contact information (see above), as relevant • Terms and conditions of employment • Work related contact details (including location and office and corporate phone numbers) • Image/photographs • Holiday and other leave related records • Your working preferences and feedback in relation to Eastman and our staff • Your preferences in relation to our use of your personal data • Hours worked and working time preferences • Statutory and non-statutory leave and absence records • Job termination details 	<ul style="list-style-type: none"> • You
7. Job Performance Information	
<ul style="list-style-type: none"> • Contact information (see above), as relevant • Role responsibilities • Personal development reviews and appraisals, and associated feedback • Training records • Attendance information, including clocking in/out systems or timesheets • Promotion application and/or outcome records • Transfer and secondment information 	<ul style="list-style-type: none"> • You • Your line manager(s) and co-workers • Training providers • Company to which transferred or seconded
8. Investigation, Grievance and Disciplinary	
<ul style="list-style-type: none"> • Contact information (see above), as relevant • Eastman investigations records • Grievance and disciplinary records • Employment tribunal records 	<ul style="list-style-type: none"> • You • Your line manager(s) and co-workers • Third parties, as permitted by applicable law • Eastman Legal • Eastman Global Business Conduct

Type of personal data	Collected from
9. Travel and Expenses Information	
<ul style="list-style-type: none"> Contact information (see above), as relevant Transaction records Visa, passport and insurance details Flight and accommodation booking information Travel itinerary information 	<ul style="list-style-type: none"> You Your use of Eastman payment cards (where relevant)
10. Benefits Information	
<ul style="list-style-type: none"> Contact information (see above), as relevant Private healthcare, life assurance and pensions memberships for you and/or your dependants or other beneficiaries Death benefit information 	<ul style="list-style-type: none"> You Third-party benefits providers Your dependants or other beneficiaries
11. Asset, Systems and Platform Usage and Communications Information	
<ul style="list-style-type: none"> Contact information (see above), as relevant Computer and phone records Access logs and usage records from document management systems and other Eastman provided applications and technologies User IDs and password information IP addresses and device identifiers Relevant records of calls, messages and/or internet or other data traffic and communications 	<ul style="list-style-type: none"> You Your use of Eastman assets, systems and platforms
12. Security, Location and Access Information	
<ul style="list-style-type: none"> Contact information (see above), as relevant Information (including image) captured or recorded by electronic card access systems, CCTV and other security control systems 	<ul style="list-style-type: none"> You Your use of Eastman security control systems

SCHEDULE 2

PROCESSING ACTIVITIES AND LAWFUL BASIS

	Purposes of processing	Categories of personal data	Lawful basis				
			We are permitted to process your personal data because...				
			You have given your consent to the processing	It is necessary to perform your employment contract	It is necessary for us to comply with a legal obligation	It is necessary for our legitimate interests or those of third parties	It is necessary to protect your vital interests (or those of someone else)
a) Recruitment and workforce planning							
1.	Developing, operating and collecting feedback on recruitment activities and employee selection processes	<ul style="list-style-type: none"> • Personal Information • Identity and Background Information • Job Performance Information 				✓	
2.	Administering your application for a job with us and considering your suitability for the relevant role	<ul style="list-style-type: none"> • Personal Information • Identity and Background Information • Job Performance Information 				✓	
3.	Obtaining, considering and verifying your employment references and employment history	<ul style="list-style-type: none"> • Identity and Background Information • Job Performance Information 				✓	
4.	Reviewing and confirming your right to work	<ul style="list-style-type: none"> • Identity and Background Information 			✓		
5.	Conducting verification and vetting, including criminal background checks and credit checks where required by law	<ul style="list-style-type: none"> • Identity and Background Information 			✓		

	Purposes of processing	Categories of personal data	Lawful basis				
			We are permitted to process your personal data because...				
			You have given your consent to the processing	It is necessary to perform your employment contract	It is necessary for us to comply with a legal obligation	It is necessary for our legitimate interests or those of third parties	It is necessary to protect your vital interests (or those of someone else)
	(Note: please also see Schedule 3)	<ul style="list-style-type: none"> • Sensitive Information 					
6.	Conducting background checks, verification and vetting which are not required by law but needed by us to assess your suitability for your role (Note: please also see Schedule 3)	<ul style="list-style-type: none"> • Identity and Background Information • Sensitive Information 	✓				
7.	Making a job offer to you and entering into a contract of employment with you	<ul style="list-style-type: none"> • Personal Information • Financial Information • Employment Administration Information • Benefits Information 		✓			
8.	Identifying and assessing Eastman's strategic business direction and resourcing needs, current employees and areas for development	<ul style="list-style-type: none"> • Employment Administration Information • Job Performance Information 				✓	
9.	Promotion and succession planning	<ul style="list-style-type: none"> • Employment Administration Information • Job Performance Information 				✓	
10.	Analysing recruitment and retention objectives, processes and employee turnover rates	<ul style="list-style-type: none"> • Employment Administration Information 				✓	

	Purposes of processing	Categories of personal data	Lawful basis				
			We are permitted to process your personal data because...				
			You have given your consent to the processing	It is necessary to perform your employment contract	It is necessary for us to comply with a legal obligation	It is necessary for our legitimate interests or those of third parties	It is necessary to protect your vital interests (or those of someone else)
		<ul style="list-style-type: none"> Job Performance Information 					
b) General employment management and administration							
11.	Communicating with you and providing you with information in connection with your employment or engagement with us from time to time	<ul style="list-style-type: none"> Personal Information 		✓		✓	✓
12.	Paying your salary, compensation and any other benefits pursuant to your contract of employment	<ul style="list-style-type: none"> Financial Information Employment Administration Information Benefits Information 		✓			
13.	Calculating and administering taxation within payroll, and your entitlements to any statutory / contractual benefits (including statutory sick pay and workforce pension arrangements)	<ul style="list-style-type: none"> Financial Information Employment Administration Information Benefits Information 			✓		
14.	Facilitating the administration of any private healthcare, life assurance/insurance, pensions initiatives and plans that we offer in connection with your employment with us (Note: please also see Schedule 3)	<ul style="list-style-type: none"> Financial Information Employment Administration Information Benefits Information Sensitive Information 			✓	✓	
15.	General staff administration, including workforce management and facilities operations	<ul style="list-style-type: none"> Employment Administration Information Asset, Systems and Platform Usage and 				✓	

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			We are permitted to process your personal data because...				
			You have given your consent to the processing	It is necessary to perform your employment contract	It is necessary for us to comply with a legal obligation	It is necessary for our legitimate interests or those of third parties	It is necessary to protect your vital interests (or those of someone else)
		Communications Information					
16.	Managing our health and safety compliance obligations (Note: please also see Schedule 3)	<ul style="list-style-type: none"> • Employment Administration Information • Sensitive Information 			✓		
17.	Managing annual leave entitlement and records, and to administer related payments	<ul style="list-style-type: none"> • Financial Information • Employment Administration Information 				✓	
18.	Managing absence records, contractual sick leave entitlement and administering related payments (Note: please also see Schedule 3)	<ul style="list-style-type: none"> • Financial Information • Employment Administration Information • Sensitive Information 		✓		✓	
19.	Managing maternity, paternity, adoption, parental and dependants leave and (where applicable) pay (Note: please also see Schedule 3)	<ul style="list-style-type: none"> • Financial Information • Employment Administration Information • Sensitive Information 			✓		
20.	Contacting the appropriate person in the event of an emergency concerning you (Note: please also see Schedule 3)	<ul style="list-style-type: none"> • Personal Information • Sensitive Information 					✓
21.	Administering our insurance policies (Note: please also see Schedule 3)	<ul style="list-style-type: none"> • Employment Administration Information 				✓	

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			We are permitted to process your personal data because...				
			You have given your consent to the processing	It is necessary to perform your employment contract	It is necessary for us to comply with a legal obligation	It is necessary for our legitimate interests or those of third parties	It is necessary to protect your vital interests (or those of someone else)
		<ul style="list-style-type: none"> • Sensitive Information 					
22.	Determining whether any adjustments are necessary to enable you to carry out your role (Note: please also see Schedule 3)	<ul style="list-style-type: none"> • Personal Information • Sensitive Information 		✓	✓		
23.	Preparing risk assessments to prevent future injuries in the workplace (Note: please also see Schedule 3)	<ul style="list-style-type: none"> • Employment Administration Information • Sensitive Information 			✓		
24.	Carrying out performance reviews	<ul style="list-style-type: none"> • Job Performance Information 				✓	
25.	Allocating and assigning responsibilities as necessary for workload management purposes, and measuring staff utilisation	<ul style="list-style-type: none"> • Employment Administration Information • Job Performance Information • Asset, Systems and Platform Usage and Communications Information 				✓	
26.	Administering, recording and analysing training and training records	<ul style="list-style-type: none"> • Employment Administration Information • Job Performance Information • Asset, Systems and Platform Usage and Communications Information 				✓	
27.	Supporting the establishment and maintenance of staff directories	<ul style="list-style-type: none"> • Employment Administration Information 				✓	

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			We are permitted to process your personal data because...				
			You have given your consent to the processing	It is necessary to perform your employment contract	It is necessary for us to comply with a legal obligation	It is necessary for our legitimate interests or those of third parties	It is necessary to protect your vital interests (or those of someone else)
28.	Considering your continuous suitability for your role	<ul style="list-style-type: none"> • Job Performance Information 				✓	
29.	Providing details of your employment to a new or potential employer, bank or financial institution where requested by you	<ul style="list-style-type: none"> • Financial Information • Employment Administration Information • Job Performance Information • Benefits Information 	✓				
30.	Handling grievance and disciplinary matters, including investigating issues, considering appropriate resolution and mitigating actions and reviewing outcomes	<ul style="list-style-type: none"> • Investigation, Grievance and Disciplinary 				✓	
31.	Responding to reference requests from your future potential employers	<ul style="list-style-type: none"> • Employment Administration Information • Job Performance Information • Investigation, Grievance and Disciplinary 				✓	
c) Security and governance							
32.	Monitoring the security of Eastman's physical premises and systems, networks and applications	<ul style="list-style-type: none"> • Security, Location and Access Information 			✓	✓	
33.	Identifying and authenticating employees and other individuals (Note: please also see Schedule 3)	<ul style="list-style-type: none"> • Security, Location and Access Information • Sensitive Information 				✓	

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			We are permitted to process your personal data because...				
			You have given your consent to the processing	It is necessary to perform your employment contract	It is necessary for us to comply with a legal obligation	It is necessary for our legitimate interests or those of third parties	It is necessary to protect your vital interests (or those of someone else)
34.	Establishing a network of emergency contacts for individuals in case of emergency	<ul style="list-style-type: none"> • Personal Information • Security, Location and Access Information 				✓	
35.	Identifying, investigating and mitigating suspected misuse of Eastman's assets, systems and platforms (Note: please also see Schedule 3)	<ul style="list-style-type: none"> • Asset, Systems and Platform Usage and Communications Information • Security, Location and Access Information • Sensitive Information 			✓	✓	
36.	Ensuring compliance with Eastman policies and procedures (Note: please also see Schedule 3)	<ul style="list-style-type: none"> • Identity and Background Information • Employment Administration Information • Investigation, Grievance and Disciplinary • Travel and Expenses Information • Asset, Systems and Platform Usage and Communications Information • Security, Location and Access Information • Sensitive Information 				✓	

d) Legal and regulatory compliance and responsibilities

	Purposes of processing	Categories of personal data	Lawful basis				
			We are permitted to process your personal data because...				
			You have given your consent to the processing	It is necessary to perform your employment contract	It is necessary for us to comply with a legal obligation	It is necessary for our legitimate interests or those of third parties	It is necessary to protect your vital interests (or those of someone else)
37.	Managing and administering our equal opportunities reporting (Note: please also see Schedule 3)	<ul style="list-style-type: none"> Sensitive Information 			✓		
38.	Responding to binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities (Note: please also see Schedule 3)	Potentially all categories of personal data			✓		
39.	Responding to non-binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities (Note: please also see Schedule 3)	Potentially all categories of personal data				✓	
40.	Complying with disclosure orders arising in civil proceedings (Note: please also see Schedule 3)	Potentially all categories of personal data			✓		
41.	Investigating, evaluating, demonstrating, monitoring, improving, reporting on and meeting Eastman's compliance with relevant legal and regulatory requirements (Note: please also see Schedule 3)	Potentially all categories of personal data			✓		
42.	Investigating, evaluating, demonstrating, monitoring, improving, reporting on and meeting Eastman's compliance	Potentially all categories of personal data				✓	

	Purposes of processing	Categories of personal data	Lawful basis				
			We are permitted to process your personal data because...				
			You have given your consent to the processing	It is necessary to perform your employment contract	It is necessary for us to comply with a legal obligation	It is necessary for our legitimate interests or those of third parties	It is necessary to protect your vital interests (or those of someone else)
	with best practice and good governance responsibilities (Note: please also see Schedule 3)						
43.	Responding to employment and industrial relations matters where permitted by applicable law, including criminal investigations, grievances, arbitrations, negotiations, elections and strikes (Note: please also see Schedule 3)	<ul style="list-style-type: none"> • Identity and Background Information • Employment Administration Information • Investigation, Grievance and Disciplinary • Security, Location and Access Information • Sensitive Information 			✓	✓	
e) Day-to-day business operations							
44.	Implementing, adapting and enhancing systems and processes to develop or improve our business and/or make your job easier or more enjoyable	<ul style="list-style-type: none"> • Employment Administration Information • Investigation, Grievance and Disciplinary • Asset, Systems and Platform Usage and Communications Information • Security, Location and Access Information 				✓	
45.	Managing, planning and delivering our global business, sales and marketing strategies	<ul style="list-style-type: none"> • Employment Administration Information 				✓	

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		<ul style="list-style-type: none"> • Job Performance Information 					
46.	Supporting our diversity programmes and staff support networks and initiatives (Note: please also see Schedule 3)	<ul style="list-style-type: none"> • Personal Information • Sensitive Information 	✓				
47.	Publishing external facing materials for marketing and public relations purposes such as where we mention you in the context of Eastman projects and initiatives in our marketing materials, social media posts and press releases	<ul style="list-style-type: none"> • Contact Information • Employment Administration Information 				✓	
48.	Administering your travel and accommodation arrangements	<ul style="list-style-type: none"> • Travel and Expenses Information 		✓	✓	✓	
49.	Supporting and maintaining our technology infrastructure	<ul style="list-style-type: none"> • Asset, Systems and Platform Usage and Communications Information • Security, Location and Access Information 		✓		✓	
50.	Supporting the sale, transfer or merging of part or all of our business or assets, or in connection with the acquisition of or by another business (Note: please also see Schedule 3)	Potentially all categories of information			✓	✓	

SCHEDULE 3

SENSITIVE INFORMATION – PROCESSING ACTIVITIES AND LAWFUL BASIS

	Purposes of processing	Sensitive Information - lawful basis					
		We are permitted to process your personal data because...					
		You have given your explicit consent to the processing	It is necessary for your/our obligations and rights in the field of employment and social security and social protection law	It is necessary to protect the vital interests of the data subject or another person you or they are physically or legally incapable of giving consent	It is necessary for our establishment, exercise or defence of legal claims	It is necessary for reasons of substantial public interest	It is necessary for preventive or occupational medicine, for the assessment of the working capacity of the employee
a) Recruitment and workforce planning							
1.	Conducting verification and vetting, including criminal background checks and credit checks where required by law		✓			✓	
2.	Conducting background checks, verification and vetting which are not required by law but needed by us to assess your suitability for your role	✓				✓	
b) General employment management and administration							
3.	Facilitating the administration of any private healthcare, life assurance/insurance, pensions initiatives and plans that we offer in connection with your employment with us		✓			✓	
4.	Managing our health and safety compliance obligations		✓			✓	
5.	Managing absence records, contractual sick leave entitlement and administering related payments		✓			✓	
6.	Managing maternity, paternity, adoption, parental and dependants leave and (where applicable) pay		✓			✓	
7.	Contacting the appropriate person in the event of an emergency concerning you			✓			
8.	Administering our insurance policies					✓	

Purposes of processing		Sensitive Information - lawful basis We are permitted to process your personal data because...					
		You have given your explicit consent to the processing	It is necessary for your/our obligations and rights in the field of employment and social security and social protection law	It is necessary to protect the vital interests of the data subject or another person you or they are physically or legally incapable of giving consent	It is necessary for our establishment, exercise or defence of legal claims	It is necessary for reasons of substantial public interest	It is necessary for preventive or occupational medicine, for the assessment of the working capacity of the employee
9.	Determining whether any adjustments are necessary to enable you to carry out your role		✓			✓	
10.	Preparing risk assessments to prevent future injuries in the workplace		✓			✓	
c) Security and governance							
11.	Identifying and authenticating employees and other individuals	✓				✓	
12.	Identifying, investigating and mitigating suspected misuse of Eastman's assets, systems and platforms				✓		
d) Legal and regulatory compliance and responsibilities							
13.	Managing and administering our equal opportunities reporting					✓	
14.	Responding to binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities or sharing information (on a voluntary basis) with the same				✓		
15.	Responding to non-binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities	✓					
16.	Complying with disclosure orders arising in civil proceedings				✓		
17.	Investigating, evaluating, demonstrating, monitoring, improving and reporting on Eastman's compliance with				✓		

Purposes of processing		Sensitive Information - lawful basis We are permitted to process your personal data because...					
		You have given your explicit consent to the processing	It is necessary for your/our obligations and rights in the field of employment and social security and social protection law	It is necessary to protect the vital interests of the data subject or another person you or they are physically or legally incapable of giving consent	It is necessary for our establishment, exercise or defence of legal claims	It is necessary for reasons of substantial public interest	It is necessary for preventive or occupational medicine, for the assessment of the working capacity of the employee
	relevant legal and regulatory requirements						
18.	Investigating, evaluating, demonstrating, monitoring, improving, reporting on and meeting Eastman's compliance with best practice and good governance responsibilities	✓			✓		
19.	Responding to employment and industrial relations matters where permitted by applicable law, including criminal investigations, grievances, arbitrations, negotiations, elections and strikes				✓		
e) Day-to-day business operations							
20.	Supporting our diversity programmes and staff support networks and initiatives	✓					
21.	Supporting the sale, transfer or merging of part or all of our business or assets, or in connection with the acquisition of or by another business	✓					

SCHEDULE 4

YOUR RIGHTS IN RELATION TO PERSONAL DATA

If any of the personal information you have given to us changes, such as your contact details, please go to Benefits, Health, and Money on MyEastman (US Only), contact a local Human Resource representative, or inform us by contacting the Privacy Office at privacy@eastman.com.

Your right	What does it mean?	Limitations and conditions of your right
Right of access	Subject to certain conditions, you are entitled to have access to your personal data (this is more commonly known as submitting a "data subject access request").	If possible, you should specify the type of information you would like to see to ensure that our disclosure is meeting your expectations. We must be able to verify your identity. Your request may not impact the rights and freedoms of other people, e.g. privacy and confidentiality rights of other staff.
Right to data portability	Subject to certain conditions, you are entitled to receive the personal data which you have provided to us and which is processed by us by automated means, in a structured, commonly-used machine readable format.	If you exercise this right, you should specify the type of information you would like to receive (and where we should send it) where possible to ensure that our disclosure is meeting your expectations. This right only applies if the processing is based on your consent or on our contract with you and when the processing is carried out by automated means (i.e. not for paper records). It covers only the personal data that has been provided to us by you.
Rights in relation to inaccurate personal or incomplete data	You may challenge the accuracy or completeness of your personal data and have it corrected or completed, as applicable. You have a responsibility to help us to keep your personal information accurate and up to date. We encourage you to notify us of any changes regarding your personal data as soon as they occur, including changes to your contact details, telephone number, immigration status.	Please always check first whether there are any available self-help tools to correct the personal data we process about you. This right only applies to your own personal data. When exercising this right, please be as specific as possible.
Right to object to or restrict our data processing	Subject to certain conditions, you have the right to object to or ask us to restrict the processing of your personal data.	As stated above, this right applies where our processing of your personal data is necessary for our legitimate interests. You can also object to our processing of your personal data for direct marketing purposes.
Right to erasure	Subject to certain conditions, you are entitled to have your personal data erased (also known as the " <i>right to be forgotten</i> "), e.g. where your personal data is no longer needed for the purposes it was collected for, or where the relevant processing is unlawful.	We may not be in a position to erase your personal data, if for example, we need it to (i) comply with a legal obligation, or (ii) exercise or defend legal claims.
Right to withdrawal of consent	As stated above, where our processing of your personal data is based on your consent, you have the right to withdraw your consent at any time.	If you withdraw your consent, this will only take effect for future processing.

Updated 9/2/2020