EASTMAN JOB APPLICANT FAIR PROCESSING NOTICE ("NOTICE")

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

This Notice explains how and why the Eastman Company (also referred to as "Eastman", "we", "our" and "us") uses personal data about individuals that apply to become employees, staff, contractors, trainees, officers, consultants, and temporary or agency workers of Eastman (referred to as "you").

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 any contract with you (including any contract of employment that may be offered) or any other contract to provide services.

2. Our data protection responsibilities

"Personal data" is any information that relates to an identifiable natural person. Your name, address, contact 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 your application without your personal data. Where we don't need your personal data, we will make this clear, for instance we will explain if any part of an application form you are required to complete is 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 correspond with us and apply for a job with us (for example, by completing an application or making an enquiry via Eastman website). We also obtain some personal data from other sources, and create some personal data ourselves (for example, our notes of your performance throughout the application process will contain personal data about you).

Please note: if you use the Eastman website at <u>www.eastman.com</u> to engage with Eastman or apply for a vacancy, our processing of your personal data will be also conducted in accordance with our Website Fair Processing Notice available on <u>www.eastman.com/privacy</u>. There may be some overlap with the processing conducted in accordance with this notice and the Website Fair Processing Notice. Therefore, we would encourage you to review both.

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 previous employers, your use of our systems and platforms, and your (or our) recruitment agent (as applicable).

Due to the type of work conducted by Eastman, we also perform background checks on our Applicants. Depending on the job role, these checks can relate to any criminal convictions that you may have and your credit reference history. These checks 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 inform us by accessing <u>https://jobs.eastman.com/</u> or contacting the Chief Privacy Office at <u>privacy@eastman.com</u>.

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

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

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 purposes for which we process your personal data and the relevant lawful basis on which we rely for that processing.

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.

Please note that we do not use your personal data to make any decisions about you which are solely based on automated decision making.

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 applications we may receive in relation to certain types of roles.

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 (please see the relevant section of the table at Schedule 1 or more details), which we are required to process with more care, in accordance with applicable data protection laws.

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.

Within Eastman:

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, for line management, authorizations/approvals with relevant decision makers, reporting and where systems and services are provided on a shared basis.

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:

From time to time we may ask third parties to carry out certain business functions for us, such as 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.

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 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 or others; and
- (b) in connection with a sale, purchase or transfer of all or part of a business, we may disclose or transfer your personal data to the prospective seller, buyer or transferor and their advisors.

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

- (a) recruitment agencies appointed by you or us;
- (b) consultants and professional advisors including legal advisors and accountants;
- (c) courts, court-appointed persons/entities, receivers and liquidators;
- (d) trade associations and professional bodies;
- (e) insurers; and
- (f) 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 do we communicate with you?

We will use your personal data to contact you in relation to the progress of any applications that you make with us and to respond to any other questions, comments or complaints that you may raise.

From time to time, we will also send you information in relation to other roles and vacancies which may be of interest. Such communications will only be sent with your consent (where this is required by law) and you will be given the opportunity to opt-out of receiving such communications at any time.

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

If you are successful in your application, 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.

Where you are unsuccessful in your application, we will only retain your personal data for a limited period of time.

In either case, how long we retain your data 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 another regulatory authority to keep your personal data for a valid reason.

11. 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 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 exercise any of these rights please contact the Chief Privacy Office at privacy@eastman.com.

12. 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.

13. 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 the Chief Privacy Office at <u>privacy@eastman.com</u>.

<u>SCHEDULE 1</u>

CATEGORIES OF PERSONAL DATA

Type of personal data	Collected from
1. Contact Information	
Name(s)	 You
Address(es)	• 100
Email address(es)	
 Contact details including mobile telephone number(s) 	
2. Personal Information	
	 You
	• 100
3. Identity and Background Information	- Dearuitment
Contact information (see above), as relevant	Recruitment
Details of education and qualifications and results	consultants
Career history, experience and skillsPassport information	and agenciesYour previous
	Your previous employers
 Driving licence information Right to work, residency and/or other visa information (where unrelated to 	 Publicly
• Right to work, residency and/or other visa information (where unrelated to your race or ethnicity)	 Publicity available
Curriculum Vitae (CV) or resume	information
 Educational certificates or other qualification evidence 	from online
 Image or photographs 	resources
Application form	TESOULCES
 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)	
4. Financial Information	
Contact information (see above), as relevant	You
 Bank account details 	Your previous
 Previous and/or offered salary, compensation and other remuneration 	employer
information	employer
 National insurance number and/or other governmental identification 	
numbers	
Tax codes	
5. Sensitive Information (where required or applicable locally)	
Contact information (where required of applicable locally)	You
 Racial or ethnic origin (including your nationality and visa information) 	Your use of
 Religious or philosophical beliefs 	Eastman
 Data concerning physical and/or mental health (including occupational 	security control
health requirements, accident reports, day-to-day health concerns such as	systems
diabetes or epilepsy conditions which we should be aware of, dietary	0,000110
requirements, allergies, drug and alcohol test results and reasons for any	
short term or long term absence)	
 Information relating to actual or suspected criminal convictions and 	
offences	
6. Applicant Administration Information	
Contact information (see above), as relevant	• You
 Offered terms and conditions of employment 	- 10u
 Your working preferences and feedback in relation to Eastman and our staff 	
 Your preferences in relation to our use of your personal data 	
 Application Performance Information 	

Type of personal data	Collected from
Contact information (see above), as relevant	• You
Interview notes, assessments, and associated feedback	 Eastman staff conducting interviews and administrating the application process
8. Investigation, Grievance and Complaints	
 Contact information (see above), as relevant Eastman investigations records Grievance records Employment tribunal records 	 You Eastman staff conducting interviews and administrating the application process Third parties, as permitted by applicable law
9. Asset, Systems and Platform Usage and Communications Information	
 Contact information (see above), as relevant 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 	 You Your use of Eastman assets, systems and platforms
10. Security, Location and Access Information	
 Contact information (see above), as relevant Information (including image) captured or recorded by electronic card access systems, CCTV and other security control systems 	 You Your use of Eastman security control systems

<u>SCHEDULE 2</u>

PROCESSING ACTIVITIES AND LAWFUL BASIS

			Lawful basis We are permitted to process your personal data because					
	Purposes of processing	Categories of personal data	You have given your consent to the processing	It is necessary to perform a contract with you	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 workfo	rce planning						
1.	Developing, operating and collecting feedback on recruitment activities and employee selection processes	 Personal Information Identity and Background Information Application Performance Information 				*		
2.	Administering your application for a job with us and considering your suitability for the relevant role	 Personal Information Identity and Background Information Application Performance Information 				~		
3.	Obtaining, considering and verifying your employment references and employment history	 Identity and Background Information Application Performance Information 				~		
4.	Reviewing and confirming your right to work	 Identity and Background Information 			~			

					Lawful basis		
	Purposes of processing	Categories of personal data	You have given your consent to the processing	It is It is necessary to perform a contract with you	t is It is necessary for us to comply with a legal obligation	sonal data because 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)
5.	Conducting verification and vetting, including criminal background checks and credit checks where required by law (Note: please also see Schedule 3)	 Identity and Background Information 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)	 Identity and Background Information Sensitive Information 	~			✓	
7.	Making a job offer to you and entering into a contract of employment with you	 Personal Information Financial Information Applicant Administration Information 		~		✓	
8.	Identifying and assessing Eastman's strategic business direction, resourcing needs and areas for development	 Applicant Administration Information Application Performance Information 				✓	
9.	Promotion and succession planning	Applicant Administration Information				~	

			Lawful basis						
			You have	We are permitted to It is	o process your per It is	It is necessary	It is		
	Purposes of processing	Categories of personal data	given your consent to the processing	necessary to perform a contract with you	necessary for us to comply with a legal obligation	for our legitimate interests or those of third parties	necessary to protect your vital interests (or those of someone else)		
		Application Performance Information					6136)		
10.	Analysing recruitment and retention objectives, processes and employee turnover rates	 Applicant Administration Information Job Performance Information 				✓			
11.	Communicating with you and providing you with information in connection with your	 Personal Information 	✓	✓		✓			
	application or engagement with us from time to time								
12.	General staff administration, including workforce management and facilities operations	 Employment Administration Information Asset, Systems and Platform Usage and Communications Information 				~			
13.	Managing our health and safety compliance obligations (Note: please also see Schedule 3)	 Applicant Administration Information Sensitive Information 			~				
14.	Determining whether any adjustments are necessary to enable you to carry out a role	Personal InformationSensitive Information		~	~				

					Lawful basis		
			V	Ve are permitted to	o process your per	sonal data because	
	Purposes of processing	Categories of personal data	You have given your consent to the processing	It is necessary to perform a contract with you	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)
	offered to you (Note: please also see Schedule 3)						
15.	·	 Personal Information Application Performance Information 				~	
16.	Handling grievances and complaints, including investigating issues, considering appropriate resolution and mitigating actions and reviewing outcomes	 Investigation, Grievance and Complaints 				✓	
17.	Responding to feedback requests from you or your recruiter	 Applicant Administration Information Application Performance Information Investigation, Grievance and Complaints 	~			✓	
c)	Security and governance						
18.	Monitoring the security of Eastman's physical premises and systems, networks and applications	 Security, Location and Access Information 			~	~	
19.	Identifying and authenticating Applicants and other individuals (Note:	 Security, Location and Access Information 				~	

			Lawful basis				
			We are permitted to process your personal data because				
	Purposes of processing	Categories of personal data	You have given your consent to the processing	It is necessary to perform a contract with you	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)
	please also see Schedule 3)	Sensitive Information					
20.		 Asset, Systems and Platform Usage and Communications Information Security, Location and Access Information Sensitive Information 			~	~	
d)	Legal and regulatory cor	mpliance and responsit	oilities				
21.	Managing and administering our equal opportunities reporting (Note: please also see Schedule 3)	Sensitive Information			~		
22.	Establishing and potentially contacting an emergency contact for individuals in case of emergency (Note: please also see Schedule 3)	 Personal Information Security, Location and Access Information 				✓	✓
23.	Responding to binding requests or search warrants or orders from courts, governmental, other regulatory and/or enforcement bodies and authorities (Note: please also see Schedule 3)	Potentially all categories of personal data			~		

			Lawful basis We are permitted to process your personal data because				
						sonal data because	
	Purposes of processing	Categories of personal data	You have given your consent to the processing	It is necessary to perform a contract with you	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)
24.	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	✓			✓	
25.	Complying with disclosure orders arising in civil proceedings (Note: please also see Schedule 3)	Potentially all categories of personal data			~		
26.	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			~		
27.	Investigating, evaluating, demonstrating, monitoring, improving, reporting on and meeting Eastman 's compliance with best practice and good	Potentially all categories of personal data				~	

					Lawful basis		
			١	Ne are permitted to	o process your per	rsonal data because	
	Purposes of processing	Categories of personal data	You have given your consent to the processing	It is necessary to perform a contract with you	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)
	governance						
	responsibilities						
	(Note: please also see						
	Schedule 3)						
e)	Day-to-day business ope						
28.		Applicant					
	and enhancing systems and processes to	Administration					
	develop or improve our	InformationInvestigation,					
	business and/or make	 Investigation, Grievance and 					
	the application process	Complaints					
	easier or more enjoyable	 Asset, Systems 					
		and Platform				\checkmark	
		Usage and					
		Communications					
		Information					
		Security, Location					
		and Access					
		Information					
29.	0 0 1 0	Application					
	delivering our global	Administration					
	business strategies					\checkmark	
		Application					
		Performance					
30.	Supporting and	InformationAsset, Systems					
30.	maintaining our	 Asset, Systems and Platform 					
	technology	Usage and					
	infrastructure	Communications		,		~	
		Information		\checkmark		\checkmark	
		Security, Location					
		and Access					
		Information					

			Lawful basis We are permitted to process your personal data because						
	Purposes of processing	Categories of personal data	You have given your consent to the processing	It is necessary to perform a contract with you	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)		
31.	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

			Sensitive Information - lawful basis						
			We are per	rmitted to proce ss	your personal data t	pecause			
	Purposes of processing	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 plan	ning		1	1	1			
1.	Conducting verification and vetting, including criminal background checks and credit checks where required by law		\checkmark			1			
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 application managemen	t and administrat	ion						
3.	Managing our health and safety compliance obligations		~			✓			
4.	Determining whether any adjustments are necessary to enable you to carry out a role		✓			4			
c)	Security and governance								
5.	Identifying and authenticating Applicants and other individuals	\checkmark				✓			
6.	Identifying, investigating and mitigating suspected misuse of Eastman's assets, systems and platforms				~				
7.	contacting an emergency contact for individuals in case of emergency	~	4						
d)	Legal and regulatory compliance	and responsibilit	ies						
8.	Managing and administering our equal opportunities reporting					✓			
9.	Responding to binding requests or search warrants or orders				~				

			S	ensitive Informat	ion - lawful basis			
			We are permitted to process your personal data because					
	Purposes of processing	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	
	from courts, governmental, regulatory and/or enforcement bodies and authorities or sharing information (on a voluntary basis) with the same							
10.	Responding to non-binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities	✓						
11.	Complying with disclosure orders arising in civil proceedings				✓			
12.	Investigating, evaluating, demonstrating, monitoring, improving and reporting on Eastman's compliance with relevant legal and regulatory requirements				~			
13.	Investigating, evaluating, demonstrating, monitoring, improving, reporting on and meeting Eastman's compliance with best practice and good governance responsibilities	✓			×			
e)								
14.		✓						

<u>SCHEDULE 4</u>

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 <u>https://jobs.eastman.com/</u> or inform us by contacting the Chief Privacy Office at <u>privacy@eastman.com</u>.

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 " <i>data subject access request</i> ").	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 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 "right to be forgotten"), 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.