

HOLCIM DATA PROTECTION POLICY

Last update: October 2023

Holcim Ltd and its Subsidiaries (jointly referred to as "Holcim" or "we") are committed to protecting your personal data and to being transparent about how your personal data is processed. As a general rule, the Holcim Subsidiary in the country where you reside is the data controller responsible for processing your personal data. Contact details for each Holcim Subsidiary in the European Union can be found at <https://www.holcim.com/directory>.

With regard to the processing of your personal data, we are extremely attentive to compliance with the principles set out in the data protection legislation applicable in the countries where Holcim operates, including Regulation (EU) 2016/79 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the "GDPR").

This Data Protection Policy covers the personal data of the following categories of persons:

- customers or potential customers ;
- representatives or contacts of customers or potential customers of Holcim ;
- suppliers and subcontractors and other business partners ;
- representatives or contacts of Holcim's suppliers, subcontractors and other business partners;
- job applicants ;
- participants in educational and community partnerships ;
- employees, contractors and workers ;
- family members and dependents of employees, claimants and workers ;
- former employees, contractors and workers ;
- shareholders, corporate officers and office-holders ;
- educational and community partnerships ;
- event participants ;

- journalists and media representatives ;
- visitors to our premises ;
- users of our websites ;
- general public.

This Data Protection Policy aims to describe in detail all the processing activities we carry out and the Data Protection Policy is therefore structured by reference to the type of relationship or interaction you have with Holcim. In other words, not all sections and not all purposes of processing in this Data Protection Policy will apply to everyone.

This Data Protection Policy describes the following:

- the purposes for which we collect and use your personal data;
- the reasons justifying the processing to achieve these purposes;
- the categories of personal data we collect from you and process, and where they come from;
- whether or not it is necessary to disclose your personal data and the possible consequences of your refusal to disclose such data;
- the actual or potential recipient(s) of your personal data;
- the countries to which we transfer your personal data ;
- duration of treatment ;
- your rights as a data subject and how you can exercise them.

I. PURPOSES, LEGAL BASIS FOR PROCESSING AND CATEGORIES OF PERSONAL DATA

In the course of your interactions with Holcim, you as an individual may be subject to the processing activities we carry out. We therefore use your personal data in the following cases:

1. If you are a customer or potential customer of Holcim

Activity	Goals	Categories of personal data and sources	Legal basis for processing
<p>Customer due diligence and reporting procedures</p>	<p>We process your personal data as part of our due diligence obligations prior to our contractual relationship with you. If and insofar as required or permitted by law, this may include checks under anti-money laundering legislation, compliance with anti-bribery and corruption legislation or other similar checks. We carry out these due diligence procedures to ensure the appropriateness of our relationship with you and to identify and manage any potential risks before entering into a contractual relationship with you.</p>	<p>Name, e-mail, telephone, fax, address, data resulting from the vigilance procedure carried out, and other personal data communicated directly by you, necessary to achieve this purpose. Some of this personal data is collected from other sources and not directly from you, namely our service providers, business partners and freely available sources.</p>	<p>Depending on the country in which processing takes place, processing is necessary either :</p> <ul style="list-style-type: none"> • to fulfil a legal obligation incumbent upon us, or • to achieve our legitimate interests in taking the necessary measures to protect our business, in particular to preserve and develop our commercial operations. <p>In the event that some of the personal data is subject to a special regime under data protection legislation, we will process such data in the manner set out below.</p>

			to the extent that one or more of the safeguards prescribed by law for the processing of such data apply.
Providing the services you have requested	<p>We process your personal data for the following purposes:</p> <ul style="list-style-type: none"> • negotiate with you the terms of the relationship and conclude the agreement; • providing the services you have requested and managing the aspects arising from our contractual relationship; • communication with you in connection with any aspect of the services you have requested (e.g. provision of pricing information, delivery of products purchased, management and facilitation of the relationship and issue of invoices); • payment facilitation for goods and services ; 	Name, e-mail, telephone, fax, address, and other personal data communicated directly by you, necessary to achieve this purpose.	We base our performance on the agreement made with you.
Customer management	<p>We process your personal data for customer management purposes:</p> <ul style="list-style-type: none"> • creation, management and maintenance of a customer relationship management (CRM) database, including corresponding organizational charts; 	Name, e-mail, telephone, fax, address, and other personal data communicated directly by you, necessary to achieve this purpose.	We base this on our legitimate economic interests, which include adopting the necessary measures to facilitate our customer relationship management.

	<ul style="list-style-type: none"> customer record keeping, including minutes of meetings and other notes ; 		
Legal action and risk management	<p>We process your personal data in accordance with our legal rights and obligations, for the following purposes:</p> <ul style="list-style-type: none"> taking any action necessary to enforce or defend any right in any legal action brought by or against you or otherwise involving you; periodic reporting at Group level. 	Name, e-mail, telephone, fax, address, and other personal data communicated directly by you, necessary to achieve this purpose.	We rely on our legitimate economic interests, which include taking the necessary measures to protect our business.
Ethical alerts	<p>We use a specific platform to enable the reporting of any suspected infringements related to potential breaches of applicable legislation, Holcim's Code of Business Conduct and other Holcim policies and guidelines, and to investigate the reported facts.</p>	<p>Name, e-mail, telephone, fax, address, passport number, national identification number, business address, date of birth, salary or remuneration data, role within the organization, bank account data, data reported in connection with a suspected offence, data relating to potential breaches of applicable legislation, Holcim's Code of Business Conduct and other Holcim guidelines.</p> <p>Some of these personal data are</p>	<p>Depending on the country in which processing takes place, processing is necessary either :</p> <ul style="list-style-type: none"> to ensure compliance with a legal obligation incumbent upon us, or to achieve our legitimate interests in taking the necessary measures to protect our business, including preserving our reputation and acting appropriately in all the countries in which we operate.

		collected from other sources and not directly from you, i.e. the whistleblowing system, other business partners and freely available sources.	In the event that some of the personal data is subject to a special regime under data protection legislation, we will process such data to the extent that one or more of the safeguards prescribed by the legislation for the processing of such data apply.
Data processing in compliance with a legal obligation	We process your data in connection with the provision of the services to ensure compliance with our legal obligations, for example to comply with legal requests from public authorities, courts, government regulations or regulatory authorities (including, without limitation, data protection, tax and employment), in or outside your country.	Name, e-mail, telephone, fax, address, and other personal data communicated directly by you, necessary to achieve this purpose or arising from our relationship.	This processing is necessary to ensure compliance with our legal obligations.
Direct marketing	We process your personal data in order to send you our electronic newsletters promoting our services and products, only if you have subscribed to them and have therefore expressly consented to this processing. We use your personal data to decide what type of communications to send you.	Name, e-mail, telephone, fax, address, and other personal data communicated directly by you, necessary to achieve this purpose or arising from our relationship.	For the sending of commercial communications, we rely on your express consent to such processing. You can always withdraw your consent and thus exercise your choice to no longer receive our newsletters by clicking on "Unsubscribe" when you receive the communication in question, or by using the contact details below.

	<p>to you. As a rule, such decisions have no legal consequences and do not have a significant impact on you. In the event that such decisions do have a negative impact on you, you will be informed, prior to processing, of the logic involved and the significance of the possible consequences of such processing. In such cases, you have the right to obtain human intervention, to express your point of view and to consent to such decisions.</p> <p>For example, we may tailor the marketing communications you receive according to the industry sector, job title and preferences you have selected.</p>		<p>indicated in this Data Protection Policy.</p> <p>In deciding what type of commercial communication is appropriate for you, we rely on our legitimate interests in carrying out appropriate promotional activities. However, if we are required to do so under applicable law, we will ask you to give your express consent to such segmentation, for example in cases where decisions taken after the segmentation process would have legal consequences or produce significant effects on you.</p>
<p>Other marketing actions</p>	<p>We process your personal data in order to carry out certain marketing activities, such as customer satisfaction surveys, to help us understand what you think of our products or services. This may include telemarketing campaigns, online surveys, etc.</p>	<p>Name, e-mail, telephone, fax, address, and other personal data communicated directly by you, necessary to achieve this purpose or arising from our relationship.</p>	<p>Depending on the country in which the processing takes place, the grounds for processing are either :</p> <ul style="list-style-type: none"> ● Holcim's legitimate interests, i.e. ● your express consent to such processing. <p>The above-mentioned legitimate interests consist in taking the necessary measures to continuously improve our services and products.</p>

			If processing is based on your consent, you can always withdraw your consent and exercise your right not to receive our newsletters by clicking on "Unsubscribe" when you receive the communication in question, or by using the contact details indicated in this Data Protection Policy.
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2. If you are a representative or contact person of a customer or potential customer of Holcim

Activity	Goals	Categories of personal data and sources	Legal basis for processing
Customer due diligence procedures and reporting	We process your personal data as part of the due diligence obligations prior to our contractual relationship with the entity you represent or which employs you, and which is a potential customer of Holcim. If and to the extent required or permitted by law, this may include checks under anti-money laundering legislation, compliance with anti-bribery and corruption legislation or other similar checks. We carry out these due diligence procedures to guarantee the	Name, e-mail, telephone, fax, address, data resulting from the vigilance procedure carried out, and other personal data communicated directly by you, necessary to achieve this purpose. Some of this personal data is collected from other sources and not directly from you, i.e. the entity you represent or which employs you, our service providers, partners, etc.	Depending on the country in which processing takes place, processing is necessary either : <ul style="list-style-type: none"> ● to fulfil a legal obligation incumbent upon us, or ● to achieve our legitimate interests in taking the necessary measures to protect our business, in particular to preserve and develop our commercial operations. In the event that some of the personal data

	of our relationship with you and to identify and manage any potential risks before entering into a contractual relationship with you.	and freely accessible sources.	would be subject to a special regime under data protection legislation, we will process such data to the extent that one or more of the safeguards prescribed by the legislation for the processing of such data apply.
Provision of services requested by the entity you represent or that employs you	<p>We process your personal data for the following purposes:</p> <ul style="list-style-type: none"> ● negotiating the terms of the relationship with the entity you represent or that employs you, and concluding the agreement ; ● provision of the services you have requested and management of aspects arising from the contractual relationship with the entity you represent or which employs you; ● communication with you in connection with any aspect of the services you have requested (e.g. provision of pricing information, delivery of products purchased, management and facilitation of the relationship and issue of invoices); ● payment facilities for goods and services ; 	<p>Name, e-mail, telephone, fax, address, and other personal data communicated directly by you, necessary to achieve this purpose. Some of this personal data is collected from the entity you represent or which employs you.</p>	<p>We rely on our legitimate interest in providing our services in our industry and in managing our customer relationships.</p>

Customer management	<p>We process your personal data for customer management purposes:</p> <ul style="list-style-type: none"> • creation, management and maintenance of a customer relationship management (CRM) database, including corresponding organizational charts; • customer record keeping, including minutes of meetings and other notes ; 	<p>Name, e-mail, telephone, fax, address, and other personal data communicated directly by you, necessary to achieve this purpose. Some of this personal data is collected from the entity you represent or which employs you.</p>	<p>We base this processing on our legitimate economic interests, which include adopting the necessary measures to facilitate our customer relationship management.</p>
Legal action and risk management	<p>We process your personal data in accordance with our legal rights and obligations, for the following purposes:</p> <ul style="list-style-type: none"> • taking any action necessary to enforce or defend any right in any action brought by or against you or the entity you represent or employ, or otherwise involving you; • periodic reporting at Group level. 	<p>Name, e-mail, telephone, fax, address, and other personal data communicated directly by you, necessary to achieve this purpose. Some of this personal data is collected from the entity you represent or which employs you.</p>	<p>We invoke our legitimate economic interests, which include taking the necessary measures to protect our business.</p>
Ethical alerts	<p>We use a specific platform to enable the reporting of any suspected infringements related to potential breaches of applicable legislation, Holcim's Code of Business Conduct and other Holcim policies and guidelines, and to conduct an investigation into the facts reported.</p>	<p>Name, e-mail, telephone, fax, address, passport number, national identification number, business address, date of birth, salary or remuneration data, role in the organization, business e-mail address, personal data, etc. bank account, data</p>	<p>Depending on the country in which processing takes place, processing is necessary either :</p> <ul style="list-style-type: none"> • to ensure compliance with a legal obligation incumbent upon us, or • to meet our legitimate interests in taking measures

		<p>reported about a suspected offence, data relating to potential breaches of applicable legislation, Holcim's Code of Business Conduct and other Holcim guidelines.</p> <p>Some of this personal data is collected from other sources and not directly from you, namely the whistleblower, other business partners and freely available sources.</p>	<p>necessary to protect our business, in particular our reputation, and to act appropriately in all the countries in which we operate.</p> <p>In the event that some of the personal data is subject to a special regime under data protection legislation, we will process such data to the extent that one or more of the safeguards prescribed by the legislation for the processing of such data apply.</p>
Data processing in compliance with a legal obligation	<p>We process your data in connection with the provision of the services in order to ensure compliance with our legal obligations, for example to comply with requests from public authorities, courts, government regulations or regulatory authorities (including, without limitation, data protection, tax and employment), within or outside of your country.</p>	<p>Name, e-mail, telephone, fax, address, and other personal data communicated directly by you, necessary to achieve this purpose.</p> <p>Some of this personal data is collected from the entity you represent or which employs you.</p>	<p>This processing is necessary to ensure compliance with a legal obligation incumbent upon us.</p>
Direct marketing	<p>We process your personal data in order to send you our electronic newsletters.</p>	<p>Name, e-mail, telephone, fax, address, and other personal data communicated directly by</p>	<p>For the sending of commercial communications, we rely on your express consent to such processing.</p>

	<p>the promotion of our services and products, only if you have registered and expressly consented to such processing.</p> <p>We use your personal data to decide on the type of marketing communications to be sent to you. As a general rule, such decisions have no legal consequences and do not produce any significant effects on you. In the event that such decisions do have such negative effects on you, you will be informed, prior to processing, of the logic involved and the significance of the possible consequences of such processing. In such cases, you have the right to obtain human intervention, to express your point of view and to consent to such decisions.</p> <p>For example, we may tailor the marketing communications you receive according to the industry sector, job title and preferences you have selected.</p>	<p>you, , necessary to achieve this goal.</p> <p>Some of this personal data is collected from the entity you represent or which employs you.</p>	<p>You can always withdraw your consent and thus exercise your choice to no longer receive our newsletters by clicking on "Unsubscribe" when you receive the communication in question, or by using the contact details indicated in this Data Protection Policy.</p> <p>In deciding what type of commercial communication is appropriate for you, we rely on our legitimate interests in carrying out appropriate promotional activities.</p> <p>However, if we are required to do so under applicable law, we will ask you to give your express consent to such segmentation, for example in the event that decisions taken after the segmentation process would have legal consequences or produce significant effects on you.</p>
<p>Other marketing actions</p>	<p>We process your personal data in order to carry out certain marketing activities, such as satisfaction surveys.</p> <p>customer, to help us understand what you think of</p>	<p>Name, e-mail, telephone, fax, address, and other personal data communicated directly by you, , necessary to achieve this goal.</p>	<p>Depending on the country in which the processing takes place, the legal bases justifying the processing are either :</p> <ul style="list-style-type: none"> • Holcim's legitimate interests, i.e.

	<p>our products or services. This may involve telemarketing campaigns, online surveys, etc.</p>	<p>Some of this personal data is collected from the entity you represent or which employs you.</p>	<ul style="list-style-type: none"> • your express consent to such processing. <p>The above-mentioned legitimate interests consist in taking the necessary measures to continuously improve our services and products. Where processing is based on your consent, you can always withdraw your consent and thus exercise your choice not to receive our newsletters by clicking on "Unsubscribe" when you receive the communication in question, or by using the contact details indicated in this Data Protection Policy.</p>
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3. If you are a supplier, subcontractor or other business partner of Holcim

Activity	Goals	Categories of personal data and sources	Legal basis for processing
<p>Customer due diligence procedures and reporting</p>	<p>We process your personal data as part of our due diligence obligations prior to our contractual relationship with you. If and insofar as required or authorized by law, this may involve checks under anti-money laundering legislation.</p>	<p>Name, e-mail, telephone, fax, address, data resulting from the vigilance procedure carried out, and other personal data communicated directly by you, necessary to achieve this purpose.</p>	<p>Depending on the country in which processing takes place, processing is necessary either :</p> <ul style="list-style-type: none"> • to fulfil a legal obligation incumbent upon us, or • to meet our legitimate interests in taking measures

	<p>compliance with anti-bribery and anti-corruption legislation, or other similar checks.</p> <p>We carry out these due diligence procedures to ensure the appropriateness of our relationship with you and to identify and manage any potential risks before entering into a contractual relationship with you.</p>	<p>Some of this personal data is collected from other sources and not directly from you, namely our service providers, business partners and freely available sources.</p>	<p>necessary to protect our business, in particular to maintain and develop our commercial operations.</p> <p>In the event that some of the personal data is subject to a special regime under data protection legislation, we will process such data to the extent that one or more of the safeguards prescribed by the legislation for the processing of such data apply.</p>
<p>Preserving our contractual relationship with you</p>	<p>We process your personal data for the following purposes:</p> <ul style="list-style-type: none"> ● negotiate with you the terms of the relationship and conclude the agreement; ● preserving our contractual relationship with you ; ● communicate with you on all relevant business issues. 	<p>Name, e-mail, telephone, fax, address, and other personal data communicated directly by you, necessary to achieve this purpose.</p>	<p>We invoke the execution of the agreement concluded with you.</p>
<p>Contractual partner database management</p>	<p>We process your personal data for the purposes of managing the database of contractual partners, namely for the following purposes:</p>	<p>Name, e-mail, telephone, fax, address, and other personal data communicated directly by you, necessary to achieve this purpose.</p>	<p>Our legitimate business interests include taking the necessary steps to facilitate relations with our contractual partners.</p>

	<ul style="list-style-type: none"> • creation, management and maintenance of a database of our contractual partners; • keeping records relating to our contractual partners, including minutes of meetings and other notes. 		
Legal action and risk management	<p>We process your personal data in accordance with our legal rights and obligations, for the following purposes:</p> <ul style="list-style-type: none"> • taking any action necessary to enforce or defend any right in any action brought by or against you or otherwise involving you; • preparation of periodic reports at Group level ; • checks and record-keeping to ensure that our suppliers and subcontractors have the qualifications and training required to guarantee safe working conditions on our sites (supplier training records). 	Name, e-mail, telephone, fax, address, and other personal data communicated directly by you, necessary to achieve this purpose.	<p>We rely on our legitimate economic interests, which include taking the necessary measures to protect our business.</p> <p>Depending on the country, we may process supplier training records in accordance with our legal obligations.</p>
Ethical alerts	We use a specific platform to report any suspected breaches of applicable legislation, Holcim's Code of Business Conduct and other policies and procedures.	Name, e-mail, telephone, fax, address, passport number, national identification number, business address, date of birth, salary details remuneration, role within the organization, company data, etc.	<p>Depending on the country in which processing takes place, processing is necessary either :</p> <ul style="list-style-type: none"> • to ensure compliance with a legal obligation incumbent upon us, or

	<p>Holcim's directives, and to investigate the facts reported.</p>	<p>bank account, data reported in connection with a suspected offence, data relating to potential breaches of applicable legislation, Holcim's Code of Business Conduct and other Holcim guidelines. Some of this personal data is collected from other sources and not directly from you, namely the whistleblower, other business partners and freely available sources.</p>	<ul style="list-style-type: none"> to achieve our legitimate interests in taking the necessary measures to protect our business, including preserving our reputation and acting appropriately in all the countries in which we operate. <p>In the event that some of the personal data is subject to a special regime under data protection legislation, we will process such data to the extent that one or more of the safeguards prescribed by the legislation for the processing of such data apply.</p>
<p>Data processing in compliance with a legal obligation</p>	<p>We process your data in connection with the provision of the services in order to ensure compliance with our legal obligations, for example to comply with requests from public authorities, courts, government regulations or regulatory authorities (including, without limitation, data protection, tax and employment), within or outside of your country.</p>	<p>Name, e-mail, telephone, fax, address, and other personal data communicated directly by you, necessary to achieve this purpose.</p>	<p>This processing is necessary to ensure compliance with our legal obligations.</p>

<p>Direct marketing</p>	<p>We process your personal data in order to send you our electronic newsletters promoting our services and products, only if you have subscribed to them and have therefore expressly consented to this processing.</p> <p>We use your personal data to decide on the type of marketing communications to be sent to you. As a general rule, such decisions have no legal consequences and do not produce any significant effects on you. In the event that such decisions do have such negative effects on you, you will be informed, prior to processing, of the logic involved and the significance of the possible consequences of such processing. In such cases, you have the right to obtain human intervention, to express your point of view and to consent to such decisions.</p> <p>For example, we may tailor the commercial communications you receive according to your sector of activity, job title and job category.</p>	<p>Name, e-mail, telephone, fax, address, and other personal data communicated directly by you, necessary to achieve this purpose</p>	<p>For the sending of commercial communications, we rely on your express consent to such processing.</p> <p>You can always withdraw your consent and thus exercise your choice to no longer receive our newsletters by clicking on "Unsubscribe" when you receive the communication in question, or by using the contact details indicated in this Data Protection Policy.</p> <p>In deciding what type of commercial communication is appropriate for you, we rely on our legitimate interests in carrying out appropriate promotional activities. However, if we are required to do so under applicable law, we will ask you to give your express consent to such segmentation, for example in cases where decisions taken after the segmentation process would have legal consequences or produce significant effects on you.</p>
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	preferences you've selected.		
Other marketing actions	We process your personal data in order to carry out certain marketing activities, such as customer satisfaction surveys, to help us understand what you think of our products or services. This may include telemarketing campaigns, online surveys, etc.	Name, e-mail, telephone, fax, address, and other personal data communicated directly by you, necessary to achieve this purpose or arising from our relationship.	Depending on the country in which the processing takes place, the legal bases justifying the processing are either : <ul style="list-style-type: none"> • Holcim's legitimate interests, i.e. • your express consent to such processing. The above-mentioned legitimate interests consist in taking the necessary measures to continuously improve our services and products. Where processing is based on your consent, you can always withdraw your consent and thus exercise your choice not to receive our newsletters by clicking on "Unsubscribe" when you receive the communication in question, or by using the contact details indicated in this Data Protection Policy.

4. If you are a representative or contact person of a Holcim supplier, subcontractor or other business partner

Activity	Goals	Categories of personal data and sources	Legal basis for processing
Customer due diligence and reporting procedures	<p>We process your personal data as part of our due diligence obligations prior to our contractual relationship with the entity you represent or which employs you. If and insofar as required or permitted by law, this may include checks under anti-money laundering legislation, or compliance with legislation against bribery and corruption.</p> <p>We carry out these due diligence procedures to ensure the appropriateness of our relationship with you and to identify and manage any potential risks before entering into a contractual relationship with you.</p>	<p>Name, e-mail, telephone, fax, address, data resulting from the vigilance procedure carried out, and other personal data communicated directly by you, necessary to achieve this purpose.</p> <p>Some of this personal data is collected from other sources and not directly from you, namely the entity you represent or which employs you, our service providers, business partners and freely accessible sources.</p>	<p>Depending on the country in which processing takes place, processing is necessary either :</p> <ul style="list-style-type: none"> ● to fulfil a legal obligation incumbent upon us, or ● to achieve our legitimate interests in taking the necessary measures to protect our business, in particular to preserve and develop our commercial operations. <p>In the event that some of the personal data are subject to a special regime under data protection legislation, we will process such data insofar as one or more of the safeguards prescribed by the legislation for the processing of personal data are met. these data apply.</p>
Preservation of our contractual relationship with the entity you represent or that employs you	<p>We process your personal data for the following purposes:</p> <ul style="list-style-type: none"> ● negotiating the terms of the relationship with the entity you 	<p>Name, e-mail, telephone, fax, address, and other personal data communicated directly by you, necessary to achieve this purpose.</p>	<p>We rely on our legitimate interest in managing the relationship with the entity you represent or that employs you.</p>

	<p>represent or who employs you and conclusion of the agreement ;</p> <ul style="list-style-type: none"> • maintaining our contractual relationship with the entity you represent or employ; • communicating with you on your requests and any other relevant issues related to the business ; • payment facilities for goods and services. 	<p>Some of this personal data is collected from the entity you represent or which employs you.</p>	
Contract partner database management	<p>We process your personal data for the purpose of managing the database of contractual partners, in particular for the following purposes:</p> <ul style="list-style-type: none"> • creation, management and maintenance of a database of our contractual partners; • keeping records relating to our contractual partners, including minutes of meetings and other notes. 	<p>Name, e-mail, telephone, fax, address, and other personal data communicated directly by you, necessary to achieve this purpose.</p> <p>Some of this personal data is collected from the entity you represent or which employs you.</p>	<p>Our legitimate business interests include taking the necessary steps to facilitate relations with our contractual partners.</p>
Legal action and risk management	<p>We process your personal data in accordance with our legal rights and obligations, for the following purposes:</p> <ul style="list-style-type: none"> • taking any action necessary to enforce or defend any right in any action brought by or against you or otherwise involving you; 	<p>Name, e-mail, telephone, fax, address, and other personal data communicated directly by you, necessary to achieve this purpose.</p> <p>Some of this personal data is collected from the entity you represent or which employs you.</p>	<p>For the purposes of this processing, we base ourselves on our legitimate economic interests, which include taking the necessary measures to protect our business. Depending on the country, we may process supplier training records in accordance with our legal obligations.</p>

	<ul style="list-style-type: none"> • preparation of periodic reports at Group level ; • checks and record-keeping to ensure that our suppliers and subcontractors have the qualifications and training required to guarantee safe working conditions on our sites (supplier training records). 		
Ethical alerts	<p>We use a specific platform to enable the reporting of any suspected infringements related to potential breaches of applicable legislation, Holcim's Code of Business Conduct and other Holcim policies and guidelines, and to investigate the reported facts.</p>	<p>Name, e-mail, telephone, fax, address, passport number, national identification number, business address, date of birth, salary or remuneration data, role within the organization, bank account data, data reported in connection with a suspected offence, data relating to potential breaches of applicable legislation, Holcim's Code of Business Conduct and other Holcim guidelines.</p> <p>Some of this personal data is collected from other sources and not directly from you, namely the entity you represent or which employs you, the whistleblower, other business partners and freely available sources.</p>	<p>Depending on the country in which processing takes place, processing is necessary either :</p> <ul style="list-style-type: none"> • to ensure compliance with a legal obligation incumbent upon us, or • to achieve our legitimate interests in taking the necessary measures to protect our business, including preserving our reputation and acting appropriately in all the countries in which we operate. <p>In the event that some of the personal data are subject to a special regime under the legislation on the protection of personal data, they may be processed in accordance with the law.</p>

			data protection, we will process such data insofar as one or more of the safeguards prescribed by law for the processing of such data apply.
Data processing in compliance with a legal obligation	We process your data in connection with the provision of the services to ensure compliance with our legal obligations, for example to comply with requests from public authorities, courts, government regulations or regulatory authorities (including, without limitation, data protection, tax and employment), in or outside your country.	Name, e-mail, telephone, fax, address, and other personal data communicated directly by you, necessary to achieve this purpose. Some of this personal data is collected from the entity you represent or which employs you.	This processing is necessary to ensure compliance with a legal obligation incumbent upon us.
Direct marketing	We process your personal data in order to send you our electronic newsletters promoting our services and products, only if you have subscribed to them and have therefore expressly consented to this processing. We use your personal data to decide on the type of marketing communications to be sent to you. As a general rule, such decisions do not have any legal consequences or significant effects.	Name, e-mail, telephone, fax, address, and other personal data communicated directly by you, necessary to achieve this purpose. Some of this personal data is collected from the entity you represent or which employs you.	For the sending of commercial communications, we rely on your express consent to such processing. You can always withdraw your consent and thus exercise your choice to no longer receive our newsletters by clicking on "Unsubscribe" when you receive the communication in question, or by using the contact details indicated in this Data Protection Policy. To decide which type of commercial communication

	<p>on you. In the event that decisions have such negative effects on you, you will be informed, prior to processing, of the logic involved and the significance of the possible consequences of such processing. In such cases, you have the right to obtain human intervention, to express your point of view and to consent to such decisions. For example, we may tailor the marketing communications you receive according to the industry sector, job title and preferences you have selected.</p>		<p>you, we invoke our legitimate interests to carry out appropriate promotional activities. However, if we are required to do so under applicable law, we will ask you to give your express consent to such segmentation, for example in the event that decisions taken after the segmentation process would have legal consequences or produce significant effects on you.</p>
<p>Other marketing actions</p>	<p>We process your personal data in order to carry out certain marketing activities, such as customer satisfaction surveys, to help us understand what you think of our products or services. This may include telemarketing campaigns, online surveys, etc.</p>	<p>Name, e-mail, telephone, fax, address, and other personal data communicated directly by you, necessary to achieve this purpose. Some of this personal data is collected from the entity you represent or which employs you.</p>	<p>Depending on the country in which the processing takes place, the legal bases justifying the processing are either :</p> <ul style="list-style-type: none"> ● Holcim's legitimate interests, i.e. ● your express consent to such processing. <p>The above-mentioned legitimate interests consist in taking the necessary measures to continuously improve our services and products. If processing is based on your consent, you can always withdraw your consent and exercise the following rights</p>

			You can unsubscribe from our newsletters by clicking on "Unsubscribe" when you receive the communication in question, or by using the contact details indicated in this Data Protection Policy.
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5. If you are applying for a position

Activity	Goals	Categories from data and sources	Legal basis for processing
Recruitment and selection	<p>If you apply for a position with Holcim or express an interest in working for us, we use your personal data for our recruitment and selection procedures. These procedures include identifying you and communicating with you about your application, assessing you against our criteria for the role you are applying for and against other candidates, and making final recruitment decisions.</p> <p>If your application is unsuccessful, we would like to keep your personal data for up to one year, so that we can find you again if jobs similar to those for which you have applied are available.</p>	<p>Title, first name, other first name(s) and surname, birth name, other names if applicable, gender, nationality, second nationality, date of birth, age, address, telephone number, e-mail, national identification number, immigration and work eligibility data, languages spoken, driver's license, qualifications, references, CV and letter of application, interview and assessment data, other data communicated directly by you, , necessary to achieve this purpose.</p>	<p>Depending on the country in which processing takes place, the processing of your personal data to achieve these purposes is either :</p> <ul style="list-style-type: none"> • necessary to meet our legitimate interests in receiving applications for vacant positions in our company, i.e. • based on your express consent to such processing. <p>Where processing is based on your consent, you may always withdraw your consent in the manner indicated in the consent, or by notifying your decision to the contact details indicated in this Data Protection Policy.</p>

		for which you originally applied.	
Control history	of	<p>Before you are hired, we may conduct background checks on you.</p> <p>These may include, where relevant and appropriate, reputation checks, driving license checks, identity theft checks, requests for criminal records (if and to the extent permitted by applicable law), detailed professional experience, regulatory status and professional qualifications.</p>	<p>Title, first name, other first name(s) and surname, birth name, other names if applicable, gender, nationality, second nationality, date of birth, age, address, telephone number, e-mail, national identification number, immigration and work eligibility data, languages spoken, driver's license, qualifications, references, CV and application letter, interview and assessment data, other data communicated directly by you, , necessary to achieve this purpose. Some of this personal data is collected from references, or from freely accessible sources.</p>
			<p>Depending on the country in which processing takes place, processing is necessary either :</p> <ul style="list-style-type: none"> • to ensure compliance with a legal obligation incumbent upon us, or • to meet our legitimate interests in taking the necessary measures to ensure that only eligible candidates who meet the required conditions are selected. <p>In the event that some of the personal data are subject to a special regime under data protection legislation, we will process such data insofar as one or more of the safeguards prescribed by the legislation for the processing of personal data are met. these data apply.</p>

6. If you are a participant in educational and community partnerships

Activity	Goals	Categories from data and sources	Legal basis for processing
Recruitment and selection	If you are a candidate for career programs (internships...), please contact us,	Title, first name, other first name(s) and surname, birth name,	Depending on the country in which the treatment takes place, the treatment of

	<p>We process your personal data for the purposes of recruitment and selection procedures, including for the purposes of professional experience, apprenticeship and graduate programs, as well as community partnership programs organized by Holcim or with the participation of Holcim.</p> <p>If your application is unsuccessful, we would like to keep your personal data for up to one year, so that we can find you again if jobs similar to those for which you originally applied become available.</p>	<p>other names if applicable, gender, nationality, second nationality, date of birth, age, address, telephone number, e-mail, national identification number, immigration and work eligibility data, languages spoken, driver's license, qualifications, references, CV and letter of application, interview and assessment data, other data communicated directly by you, , necessary to achieve this purpose.</p>	<p>your personal data to achieve these purposes is either :</p> <ul style="list-style-type: none"> • necessary to achieve our legitimate interests in receiving applications for educational and community partnerships, i.e. • based on your express consent to such processing. <p>Where processing is based on your consent, you may always withdraw your consent in the manner indicated at the time of giving consent, or by notifying your decision to the contact details indicated in this Data Protection Policy.</p>
<p>Background check</p>	<p>Before you are hired, we may conduct background checks on you.</p> <p>These may include, where relevant and appropriate, reputation checks, driving license checks, identity theft checks, requests for criminal records (if and to the extent permitted by applicable law), detailed professional experience, regulatory status and professional qualifications.</p>	<p>Title, first name, other first name(s) and surname, birth name, other names if applicable, gender, nationality, second nationality, date of birth, age, address, telephone number, e-mail, national identification number, immigration and work eligibility data, languages spoken, driver's license, qualifications, references, CV and letter of application, interview and assessment data, other data communicated directly by you, , necessary to achieve this purpose.</p>	<p>Depending on the country in which processing takes place, processing is necessary either :</p> <ul style="list-style-type: none"> • to ensure compliance with a legal obligation incumbent upon us, or • to meet our legitimate interests in taking the necessary measures to ensure that only eligible candidates who meet the requirements of the

		purpose. Some of this personal data is collected from references, i.e. from freely accessible sources.	conditions are selected. In the event that some of the personal data is subject to a special regime under data protection legislation, we will process such data to the extent that one or more of the safeguards prescribed by the legislation for the processing of such data apply.
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7. If you are an employee, claimant or worker

Activity	Goals	Categories of personal data and sources	Legal basis for processing
HR Administration	<p>We process your personal data to manage your employment contract or other relationship with us, for the following main purposes:</p> <ul style="list-style-type: none"> • <u>HR and general personnel management</u>, payroll and benefits, expense reimbursement, time and travel accounting, training and development, performance management, sick leave and absence management, emergency contacts, procedures 	<p>Title, first name, other first name(s) and surname, birth name, other names if applicable, gender, nationality, second nationality, date of birth, age, home address (e.g. address, telephone number, e-mail), national identification number, immigration and work eligibility data, languages spoken, driver's license, qualifications, references, CV and letter of application, interview and assessment data, other data communicated</p>	<p>Depending on the country and the specific purpose, processing is necessary either :</p> <ul style="list-style-type: none"> • for the performance of your contract with Holcim, • to comply with a legal obligation incumbent upon us, or • to achieve our legitimate interests. <p>In addition, where permitted by law, the processing of your personal data will be based on</p>

			your consent, if you have expressly given it to us.
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	<p>and business continuity planning;</p> <ul style="list-style-type: none"> ● <u>personnel planning</u>, assignment and development, assessment of your suitability for one of our current or future job vacancies, assignment to project teams, reservoirs, etc. know-how or other internal groups, and confirmation of your references, profile and training; ● <u>for secondment, transfer and business travel purposes</u>, contacts with local authorities or organizations, doctors, transfer agencies, travel agents and other service providers; ● <u>organizational purposes</u>, planning, control, budgeting, benchmarking and restructuring ; ● <u>security purposes</u>, maintenance and protection of our assets, ensuring the integrity and security of and controlling access to our premises, facilities, IT and communication systems, platforms and secure websites and applications, websites and other systems or facilities (including surveillance cameras or other means) 	<p>directly by you, or arising from our relationship. Some of this personal data is collected from references, i.e. from freely accessible sources.</p>	<p>Our legitimate interests are to manage our workforce and conduct our business, for example to carry out our normal business operations and to maintain a dialogue with our employees, contractors and workers, to ensure that each employee, contractor and worker performs the appropriate tasks, is properly trained and fulfills his or her role correctly and in accordance with applicable procedures. In the event that some of the personal data is subject to a special regime under data protection legislation, we will process such data to the extent that one or more of the safeguards prescribed by the legislation for the processing of such data apply.</p>
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	<p>surveillance), investigation, prevention and detection of security threats, fraud, theft or other criminal or malicious activities;</p> <ul style="list-style-type: none"> ● <u>legal documentation purposes</u>, to ensure compliance with legal documentation and document retention obligations (such as record-keeping obligations); ● <u>organizational compliance</u>, including monitoring and evaluating compliance with our policies and standards (e.g. implementation of an internal reporting and dispute management system - Integrity Line Platform) <ul style="list-style-type: none"> - to report suspected breaches of applicable legislation, Holcim's Code of Business Conduct and other Holcim policies and guidelines and to investigate reported issues in a professional, fair and independent manner) ● <u>regulatory compliance</u>, ensuring compliance with our legal and regulatory obligations and requirements worldwide, including reporting to or auditing 		
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	<p>carried out by national and international regulatory, law enforcement or market authorities, which may include reference checks, background checks, public record checks, conflict checks, credit checks, criminal record requests (where applicable) and other due diligence procedures in accordance with applicable laws and regulations;</p> <ul style="list-style-type: none">• <u>general compliance</u>, ensuring compliance with legal obligations, such as complying with screening or registration obligations (e.g., pursuant to antitrust laws, export laws, trade sanctions and embargoes laws, or to prevent white-collar crime or money laundering), which may include matching your contact or identification data to lists of organizations subject to sanctions, and contacting you to confirm your identity in the event of a potential match, or recording your interactions with third parties as necessary for antitrust purposes; and		
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	<ul style="list-style-type: none"> • <u>disputes and the implementation of remedies</u>, in particular by supporting us in the management and resolution of disputes, the enforcement of decisions rendered by courts, authorities or other public bodies, the performance of our contractual agreements and in the establishment, exercise or defense of a right in a legal action. 		
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8. If you are a family member or dependent of Holcim employees, contractors or workers

Activity	Goals	Categories of personal data and sources	Legal basis for processing
Emergency contact management	We process your personal data in order to be able to contact you in the event of an emergency, to keep you informed of any accidents or incidents involving our employees, contractors and workers in the workplace.	Contact information provided by our employees, contractors and workers.	Depending on the country in which the employees, contractors and workers carry out their activities, the processing of your personal data for this purpose is necessary either : <ul style="list-style-type: none"> • to comply with a legal obligation incumbent upon us, or • to meet our legitimate interests in ensuring the safety of our employees, contractors and workers.

Benefits management	We process your personal data for the following purposes	Contact information provided by our employees, contractors and	Depending on the country in which employees, contractors and
	grant and manage your benefits as a family member or dependent of our employees, contractors and workers. These benefits may include enrolment in supplementary health, old-age or death insurance.	workers and any other data you communicate directly to us.	workers carry out their activity, and depending on the type of benefit offered by Holcim, the processing of your personal data for this purpose is necessary either : <ul style="list-style-type: none"> • to comply with a legal obligation incumbent upon us, or • to meet our legitimate interests in managing our workforce and conducting our business, which also includes providing you with the assurance that access to benefits.

9. If you are a former employee, contractor or worker of Holcim

Activity	Goals	Categories of personal data and sources	Legal basis for processing
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Archiving	We process your personal data for archiving purposes.	Personal data contained in personnel registers or other documents or media, if necessary to achieve the purpose.	Depending on the country in which you have carried out your activity, the processing of your personal data for this purpose is necessary either : <ul style="list-style-type: none"> • to comply with a legal obligation incumbent upon us, or • to achieve our economic interests legitimate.
Data processing in compliance with a legal obligation	We process your personal data in order to comply with Holcim's legal obligations as a former employer.	Name, e-mail, telephone, fax, address, and other personal data communicated directly by you, necessary to achieve this purpose or processed by us in the context of the relationship between us.	The legal basis for processing is our legal obligation.

10. If you are a shareholder holding shares in Holcim

Activity	Goals	Categories of personal data and sources	Legal basis for processing
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<p>Managing your relationship with Holcim</p>	<p>We process your personal data for :</p> <ul style="list-style-type: none"> ● manage your relationship with Holcim as a company director or office holder ; ● maintain the legal registers of our group companies; ● manage compliance with all regulatory and statutory obligations arising from our relationship ; ● archive and manage your directorate/mandate's records, as required; ● create and manage meeting minutes. 	<p>Name, e-mail, telephone, fax, address, and other personal data communicated directly by you, necessary to achieve this purpose.</p>	<p>Depending on the country in which you operate, the processing of your personal data for this purpose is necessary either :</p> <ul style="list-style-type: none"> ● to comply with a legal obligation incumbent upon us, or ● to achieve our legitimate business interests, i.e. managing our relationships with our executives and office-holders.
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11. If you are an officer or an office holder

Activity	Goals	Categories of personal data and sources	Legal basis for processing
Managing your relationship with Holcim	We process your personal data for : <ul style="list-style-type: none"> ● manage your relationship with Holcim as a company director or office holder ; ● maintain the legal registers of our group companies; ● manage compliance with all regulatory and statutory obligations arising from our relationship ; ● archive and manage your directorate/mandate's records, as required; ● create and manage meeting minutes. 	Name, e-mail, telephone, fax, address, and other personal data communicated directly by you, necessary to achieve this purpose.	Depending on the country in which you operate, the processing of your personal data for this purpose is necessary either : <ul style="list-style-type: none"> ● to comply with a legal obligation incumbent upon us, or ● to achieve our legitimate business interests, i.e. managing our relationships with our executives and office-holders.

12. If you are an event participant

Activity	Goals	Categories of personal data and sources	Legal basis for processing
Event management	We process your personal data in connection with your participation in events organized by or in collaboration with Holcim, for the following purposes:	Name, e-mail, telephone, fax, address, and other personal data communicated directly by you, necessary to achieve this purpose.	The processing is necessary to achieve Holcim's legitimate economic interests, namely to hold promotional or educational events. To the extent required by law, we will process your data

	<ul style="list-style-type: none"> • management of a database of potential guests and participants ; • invitations ; • event or conference management and administration ; • preparation of documentation for events, including photos, names, biographical data and contact details of participants, where applicable. 		personal data after receiving your express consent. In this case, you may withdraw your consent by the means made available for each event or by using the contact details indicated in this Data Protection Policy.
Close-up photography / video recording	We may process your personal data in connection with close-up photos / video recordings taken during your participation in events organized by or in collaboration with Holcim.	Photos / videos and other personal data that you may be asked to communicate directly, of your own free will.	In this case, we rely on the consent you have given by knowingly entering the premises intended for close-up photography/video recording and identified as such. You may withdraw your consent by the means provided for each event or by using the contact details provided in this Data Protection Policy.

13. If you are a journalist or media representative

Activity	Goals	Categories of personal data and sources	Legal basis for processing
Contact management	We process your personal data in order to maintain a database of	Name, e-mail, telephone, fax, address and other personal data	This processing is necessary to achieve Holcim's legitimate interests, namely the

	journalists and other media representatives and to communicate with you on a variety of topics (e.g. sharing recent information about our business activities, our performance)	communicated directly by you, , necessary to achieve this purpose.	management and promotion of its business activities.
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14. If you are a visitor to our premises

Activity	Goals	Categories from data personal personal data and sources	Legal basis for processing
Safety management	<p>We process your personal data to ensure the security of our premises, assets and staff. To achieve this purpose, we :</p> <ul style="list-style-type: none"> • keep a visitor access log for all our premises, so that we can keep track of all visitors to our premises; • have video surveillance systems on our premises and in a given perimeter around them (which also includes sidewalks and other public spaces). 	Name, e-mail, telephone, fax, address, and other personal data communicated directly by you, necessary to achieve this purpose.	<p>Depending on the country in which Holcim's premises are located, the processing of your personal data for this purpose is necessary either :</p> <ul style="list-style-type: none"> • to meet our legal obligations, i.e. • to achieve our legitimate interests of protecting our premises, assets and personnel.

Making your visit easier	We process your personal data in order to take the necessary steps to facilitate the purpose of your visit, for example, by providing access to	Name, e-mail, telephone, fax, address, data derived from the use of our technical equipment and networks, etc. personal data	The processing of your personal data for this purpose is necessary to achieve our legitimate interests,
	our technical equipment and networks.	communicated directly by you, , necessary to achieve this purpose.	to make your visit as pleasant as possible.

15. If you are a user of our website(s)

Activity	Goals	Categories of personal data and sources	v treatment
Visit our website	We process the personal data we collect from you when you visit our website, in order to ensure the appropriate use of all features available on the website, to monitor traffic and to improve the content of the website. To achieve these purposes, we use cookies, as described in detail in the Privacy Policy. cookies.	Personal data that you communicate to us by completing forms on the websites, information about your visits to the website, such as traffic data, location data, and other communication data and information about the devices used to access the website.	The processing of your personal data for this purpose is based on our legitimate interest in ensuring the proper functioning of our website and its improvement.

16. If you are a member of the general public

Activity	Goals	Categories of personal data and sources	Legal basis for processing

Management of communications received from the general public	We process your personal data in order to receive and respond to your requests or communications and to take the necessary steps to manage the communication.	Personal data provided by you in response to a request or as part of a communication or correspondence with you.	We base this data processing activity on our legitimate economic interests, namely the receipt and record-keeping of communications received, the
	We process your personal data in order to keep a record of your communications if required to do so by law or where such processing is necessary to enforce or defend a right in a legal action brought by or against you, or otherwise involving you;		managing and taking all necessary steps to enforce or defend any right in any legal action brought by or against you, or otherwise involving you.

17. For all the above-mentioned categories of data subjects

Activity	Goals	Categories of personal data and sources	Legal basis for processing
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<p>Structural changes or similar transactions involving Holcim</p>	<p>We may also need to process your data in connection with structural changes or similar transactions involving Holcim.</p>	<p>Personal data processed for the initial purposes indicated in subsections 1 to 16. above.</p>	<p>In this case, the reasons justifying the processing may be represented by :</p> <ul style="list-style-type: none"> ● legal obligation (in the event that Holcim is legally required to disclose certain personal data to public authorities); ● the performance of the agreement entered into by Holcim in connection with such transaction (if you are a party to such agreement) or Holcim's legitimate interest in completing the transaction as efficiently as possible (in other cases).
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II. COMMUNICATION OF PERSONAL DATA

When we ask you to provide us with your personal data, Holcim invites you to complete all the categories of personal data requested. You have the right to refuse to provide your personal data, but if you decide not to provide certain data, we may not be able to continue our relationship with you or provide you with the services you have requested, where :

- processing is necessary to comply with a legal obligation or to perform the agreement to which you are party, or
- we are unable to achieve the processing purposes described above without processing this data.

If you disclose the personal data of other natural persons to us, please inform them of the manner in which Holcim intends to process their personal data, as described in this Data Protection Policy, prior to such disclosure.

III. DISCLOSURE OF YOUR PERSONAL DATA

To achieve the above-mentioned purposes and to the extent necessary, we disclose or may disclose your personal data to the following categories of recipients:

- a. other companies in the Holcim Group ;
- b. central/local authorities, government agencies, government health service providers, social security authorities and other authorities ;
- c. payment service providers ;
- d. analysis service providers ;
- e. providers of IT support, storage and hosting services;
- f. accountants, lawyers and providers of legal and financial services;
- g. travel and accommodation service providers ;
- h. tax and financial service providers, benefit suppliers, payroll service managers ;
- i. HR service providers ;
- j. agents, consultants, contractors and other third parties who provide services to Holcim ;
- k. brokers, banks, insurance agents ;

- l. professional organizations (unions) ;
- m. other Holcim contractual partners to whom the data should be disclosed so that they can provide the services covered by the relevant contracts;
- n. any other natural or legal persons to whom the data should be disclosed at your request.

We disclose your personal data to the above recipients:

- if we are required or permitted to do so by law or in connection with legal proceedings, for example to enforce a court order or comply with a request from a law enforcement agency;
- if, in our opinion, disclosure is necessary or advisable to prevent personal injury or financial loss;
- as part of an investigation into actual or suspected fraudulent or other illegal activity;
- if we sell or transfer our business or assets, in whole or in part (including in the event of reorganization, liquidation or winding-up);
- for other legitimate interests justified by Holcim.

IV. TRANSFER OF YOUR PERSONAL DATA

We transfer or may transfer your personal data to recipients in countries other than the country in which the data was originally collected. These countries may not apply the same data protection laws as the country in which you originally provided your personal data. In this case, we will implement appropriate safeguards, in accordance with the law, for your personal data, regardless of the countries to which it is transferred.

If you reside in the European Economic Area and the GDPR applies to you, we may transfer your personal data to the Holcim Subsidiaries listed below:

Holcim subsidiary	Holcim subsidiary contact details
Holcim Ltd	Holcim Ltd, Zürcherstrasse 156, 8645 Jona
Holcim Group Services Ltd	Grafenauweg 10, 6300 Zug, Switzerland
Holcim Technology Ltd	Im Schachen, Holderbank Aargau 5113 Switzerland

Holcim European Business Services	Protifašistických bojovníkov 11 040 01 Košice, Slovakia
Holcim IT EMEA	Albasanz 14 28037 Madrid, Spain
Holcim Services (South Asia) Limited	17th Floor, Phase I & II, Reliable Tech Park, Thane Belapur Road, Airoli, Navi Mumbai-400708 / India
Holcim Global Hub Services Private Limited	Level 3, Tower I, Phase II, Logitech Park, A.K. Road, Sakinaka, Andheri (E), Mumbai - 400072, India

V. DURATION OF TREATMENT

We will retain your personal data for as long as is reasonably necessary to achieve the purposes described in this Data Protection Policy. For example, your personal data will be retained for the duration of your relationship with Holcim and for such further period as is necessary to ensure compliance with applicable law.

VI. YOUR RIGHTS REGARDING THE PROCESSING OF YOUR PERSONAL DATA

Right of access	Enables you to obtain confirmation that your personal data is being processed by us and, if so, details of such processing activities, as well as a copy of your personal data.
Right of rectification	Allows you to rectify inaccurate personal data.
Right to erasure	Enables you to have your personal data erased in certain cases (e.g. if the data is no longer required for the purposes for which it was collected). Please note! We will not be able to respond to such requests in all cases, for example where we are obliged by law to retain data for a certain length of time, or where the data is necessary to achieve a legitimate interest, such as defending a right before the courts.
Right to restrict processing	Allows you to ask us to freeze the use of your personal data but to keep them until we respond to another request from you, namely: (i) you have requested the rectification of data; (ii) you have requested the erasure of data in the event of unlawful processing; (iii) you have asked us to provide you with certain data for the defense of a right; (iv) you have exercised your right to object to the processing of data.

Right to object	Allows you to object to your personal data being processed, in accordance with the conditions and limits laid down by law. Please note! We are bound by law to act on such requests only in the context of direct marketing (e.g. if you receive e-mails containing our information notes, you can unsubscribe). In all other cases, we will balance our interests against your particular situation to make a final decision. When you make such a request, please explain why you object to the processing.
Right to portability	Allows you to receive, in a structured, commonly used and machine-readable format, the personal data concerning you that you have communicated to us or to transmit this data to another data controller. Please note! We are required by law to respond to such requests only in respect of data previously processed with your consent or in accordance with the performance of the contract concluded with us, and only if the processing is carried out by automated means.

To exercise your rights and find out more about the processing of your personal data, please send a request to belgium.privacy@holcim.com.

You also have the right to lodge a complaint with the relevant data protection authority. This Data Protection Policy comes into force in June 2020.

We may amend this Data Protection Policy from time to time, for example to keep it up to date or to comply with legal requirements, or if there is a change in the way we conduct our business.