



Employee Privacy Notice

This Employee Privacy Notice sets out what personal data we, Venator Materials PLC and its subsidiaries, hold about you and how we collect and use it, both whilst you are working for us and after you have left. It applies to current and former employees (Associates), applicants, workers, contractors, agency workers, consultants, interns (together referred to as 'Employees' or 'you').

We are required by data protection law to give you the information in this Privacy Notice. It is important that you read the Privacy Notice carefully in addition to our [Global Privacy Policy](#).

Our [Global Privacy Policy](#) outlines details of our responsibilities for deciding how we hold and use personal data.

This Privacy Notice does not form part of your contract of employment or other contract to provide service and does not give you any contractual rights. We may update this Privacy Notice at any time.

What type of personal data do we hold about you?

Personal data means any information relating to an individual person who can be identified (directly or indirectly) in particular by reference to an identifier (e.g. name, employee ID number, email address, physical features). It can be factual (e.g. contact details or date of birth), an opinion about an individual's actions or behaviour, or information that may otherwise impact that individual in a personal or business capacity.

We may hold and use various types of personal data about you, including, for example: biographical details; recruitment information; details of the terms of your employment with us; pay and benefits details; working hours; performance information; details of your holidays and other leave; disciplinary, conduct and grievance matters; employee representation etc.

Data protection law defines special category data as any personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health conditions, sexual life or sexual orientation, or biometric or genetic data.

We hold and use various types of special category data about you, if and where necessary, for example: sickness absence and medical information which could include information about your health.

Why do we hold your personal data and on what legal grounds?

We hold and use your personal data for employment, HR and business administration purposes. This will include, for example: management of our employment relationship with you; administration of pay and benefits; assessment of performance; provision and regulation of holidays and other leave; addressing conduct, disciplinary and grievance issues etc.

Data protection law specifies the lawful basis on which we can hold and use personal data. Most commonly, we rely on one or more of the following legal grounds when we process your personal data:

- Where we need it to perform the contract we have entered into with you (**performance of the contract**) (whether this is an employment contract, a contract for services or another type of contract). This may include, for example, ensuring that we pay you correctly and that we provide your contractual holiday entitlement.
- Where we need it to comply with a legal obligation (**legal obligation**). Typically, this may include legal obligations such as the obligation: to provide statutory holidays and statutory family leave and pay (maternity, paternity, etc.); to pay statutory minimum wages; to comply with limits on working time; to meet health and safety requirements; not to discriminate or dismiss Employees unfairly.

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- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (**legitimate interest**). This may include, for example, storing log files for IT security reasons.

How do we collect your personal data?

You provide us with most of the personal data about you that we hold and use. Other personal data about you we hold and use is generated by you in the course of carrying out your duties. For example, email correspondence or documents or when using certain equipment such as computers or door entry systems.

Some of the personal data we hold and use about you is provided by or generated from internal sources during the course of running our business. For example, colleagues may refer to you in emails or documents, your manager will assess you as part of the appraisal process and information about you may be generated as part of our business and operational planning.

Some of the personal data about you that we hold and use may come from external sources. For example: when we offered you a job, in some countries, we may have collected references from previous employers; we may obtain information about you from publicly available media sources; we may ask for a report from an occupational health professional if you have long-term sickness absence. We will only collect your personal data where we have an appropriate legal ground which permits us to do so.

If you give us someone else's personal data

Sometimes, you might provide us with another person's personal data – e.g. details of your emergency contact or next of kin. In such cases, we require you to inform the individual what personal data of theirs you are giving to us. You must also give them our contact details and let them know that they should contact us if they have any queries about how we will use their personal data.

Who do we share your personal data with?

We will only share your personal data with third parties where we have an appropriate legal ground under data protection law which permits us to do so. Commonly, this could include situations where we are legally obliged to provide the information (e.g. for tax purposes), to comply with our contractual duties (e.g. to process your payroll, to providers of your contractual benefits such as occupational pension, health insurance, disability insurance etc.) or where it is necessary in our legitimate interest (e.g. to an IT service provider for maintenance of our IT systems).

Consequences of not providing personal data

We only ask you to provide personal data when we have a good reason and there may therefore be consequences if you do not provide particular information to us.

Some of the personal data you provide to us is required by law. For example, if you do not provide your National or Social Insurance number, we will not be able to make correct tax or national/social insurance deductions or payments.

We may require you to provide other personal data, where it is necessary for us or our pensions/benefits providers to fulfil our contractual obligations to you, or for you to fulfil your contractual obligations to us, or where our use of the data is necessary in our legitimate interests. For example, if you do not provide us with time data or provide time claim forms, we cannot pay you for certain hours or overtime you have worked / if you do not complete the application form for health insurance, we cannot provide you with health insurance / if you do not complete an application form for the pension scheme, we cannot enrol you with our pension provider. If you choose not to

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provide us with personal data requested, we will tell you about the particular implications of any such decision at the relevant time.

How long will we keep your personal data?

Our [Global Data Retention Policy](#) outlines how long we will keep personal data. . Please note that we will always keep personal data for as long as we are required to do so under legal, accounting, reporting or regulatory requirements.

Transferring personal data outside the EEA

Our Global Privacy Policy outlines how personal data is managed if the data is transmitted or sent to, viewed, accessed or otherwise used in, a different country.

Individual Rights and Requests

Under data protection law, individuals have certain rights when it comes to how we handle their personal data. This includes the right to be informed about what data is held about them, the right to request data correction when incomplete or inaccurate and the right to ask for deletion of personal data when we have no good reason for keeping it any longer.

Should you receive a request from an individual seeking to exercise a right in relation to their personal data or making a complaint about our use of their personal data you must forward this to the Privacy Team.

If you have questions relating to data privacy

You will find more information on the GDPR-VenNet-space:

<https://venator.sharepoint.com/sites/vennet/Resources/legal/GDPR/Pages/default.aspx>

If you have any questions about how personal data is being used by Venator Materials PLC or its subsidiaries you can contact the Privacy Team:

privacy@venatorcorp.com