

Johns Manville - EU Jobseeker Privacy Notice

Update: March 2021

Johns Manville Slovakia, a.s., a subsidiary of Johns Manville (hereinafter collectively referred to as "Johns Manville", "we", "us" in all grammatical forms), undertakes to comply with its obligations under the European Union's General Data Protection Regulation ("GDPR") in relation to the collection, storage, use and further processing of personal data collected during the recruitment and hiring process.

This privacy notice sets out how we process EU personal data in our role as data controller in the recruitment and hiring process. It also tells you how you can exercise your rights (including the right to object to certain processing activities). Further information about your rights and how you can exercise them is set out in the '**Your rights and choices**' section below.

Please note that as part of our recruitment and selection process, we will disclose your personal data to the line manager(s) responsible for the position you are applying for. Depending on the position, this may mean that we will disclose your personal data to supervisors employed by other Johns Manville entities, including Johns Manville entities located outside of the European Economic Area ("EEA"). For example, for certain positions, we may disclose your personal information to supervisors located in our U.S. headquarters. When providing personal information to supervisors employed by an entity other than Johns Manville Europe GmbH, Johns Manville Europe GmbH and the other Johns Manville entity will act as joint controllers of your personal information.

What personal data we collect and process

When you apply for a job at Johns Manville, we may collect and process the following information about you:

- your identifying information, such as your name, address, date of birth, gender and contact details, including email address and telephone number,
- details of your qualifications, skills, experience and education and employment history, including your ability to meet the requirements of the job,
- information about your current salary, including entitlements to benefits,
- the information you send in CVs, letters, written forms or other written materials needed for the job evaluation,
- data generated by interviewers and recruiters based on interactions with you,
- other information that is otherwise relevant to your employment with Johns Manville.

Depending on the job you are applying for, we may conduct background checks. These checks may cover any criminal convictions that concern you. Personal

checks shall be carried out in accordance with the legislation in force. We will obtain your prior consent before conducting a background check, unless such consent is required by law.

You are under no legal or contractual obligation to provide your personal data to Johns Manville during the recruitment process. However, if you do not provide this information, we may not be able to process your application correctly or at all.

How and why we use your personal data

We may process personal data for:

- assessing your suitability for the job you are applying for and the future tasks that may arise from the job,
- performing administrative functions related to recruitment,
- performing an analysis of our applicant database based on the recruitment information you provide to better understand who is applying for positions at Johns Manville.

Our processing of such personal data is carried out according to the following **legal bases**:

- **you have consented** to the use of your personal data,
- the processing is necessary **for the performance of a contract to which** you are a party or for us to take steps at your request before entering into such a contract,
- we have a **legal obligation to** process your personal data, for example to comply with applicable tax and other government regulations or to comply with a court order or binding law enforcement request,
- to **protect your vital interests or the interests of others**,
- we have a **legitimate interest in** using your personal data. In particular, we have a legitimate interest in recruiting suitable staff and in the effective administration and management of our staff.

Johns Manville may process special categories of personal data as required and permitted by applicable Member State law. We will obtain your consent before processing special categories of personal data, unless such consent is required by law.

Currently, Johns Manville does not make any hiring decisions by automated means.

If we make a material change to the way we process your personal data, we will notify you and may also amend this privacy notice.

How we may disclose your personal data

We may provide your personal data to:

- internally with our parent company, affiliates, subsidiaries and other business units and departments within Johns Manville for general business and workforce management purposes. This may include, for example, members of the Human Resources department and recruiting team, interviewers and those involved in the recruiting process, supervisors in the business area with a vacancy, and IT staff when access to data is necessary to perform their roles.

- third parties with whom we work to provide services, such as hosting, support and maintenance of any recruitment platforms.
- If we offer you employment, we will use former employers to obtain references about you (if we have a reasonable interest in verifying your information and it is necessary for verification purposes or if you have given us permission to contact your former employer) and background check providers to obtain necessary background checks to the extent that such background checks are permitted by applicable law and are necessary to assess your suitability for the role/job for which you are applying.
- if we are involved in a reorganization, merger, acquisition or sale of some or all of our assets, we may disclose your personal information to the potential seller or buyer (and/or its advisors). The recipient of the personal data will process the data in accordance with this notice and/or provide additional notice in accordance with applicable law.
- for the purpose of complying with applicable law or protecting our rights and interests. For example, we may disclose your personal information if we determine that such disclosure is reasonably necessary to comply with the law, to protect our rights or the rights, property, or interests of others, or to prevent fraud or abuse.

How long we keep your personal data

We will retain your personal information only for as long as necessary to perform our obligations or to achieve the purposes for which the information was collected or as permitted by applicable law. Generally, data from your application will be retained for one year after the position for which you have applied has ended, unless otherwise required by legal or regulatory requirements.

If your application for employment is successful, the personal data collected during the recruitment process will be transferred to your personnel file and retained for the duration of your employment. The periods for which your data will be retained will be provided to you in a new privacy notice.

Transfers of personal data

As part of the recruitment and hiring process, your data may be transferred to, stored and processed in a country other than the country in which you are employed or recruited, including countries outside the EU.

We have put in place appropriate safeguards (such as contractual obligations) in accordance with applicable data protection laws to ensure that your data is adequately protected. If you would like more information about appropriate safeguards, please contact us using the details below.

In order to ensure the transfer of this data in compliance with legal requirements, including the GDPR, the Company, JM and JM's other EU subsidiaries have entered into an inter-company agreement including contractual clauses approved by the European Commission (Standard Contractual Clauses). The intercompany agreement sets out the legal requirements for JM's use of data and describes the technical and organisational measures JM uses to protect and secure data. In the case of transfers to the US, the European Commission has not made a determination of adequacy under Article 45(1) of the GDPR at this time. This means that the

European Commission has not yet determined that the level of data protection in the U.S. is equivalent to the level of data protection within the European Union under Article 6 of the GDPR. The GDPR requires so-called adequate safeguards for the transfer of data to a third country such as the US. The safeguards are, for example, Standard Contractual Clauses ("SCCs") and Binding Corporate Rules ("BCRs") approved by the supervisory authority. In light of the European Court of Justice ("CJEU") ruling issued in July 2020, JM USA's existing SSC regarding the transfer of data to the U.S. does not provide an absolute guarantee that the protection of your personal data in the U.S. is equivalent to the level of protection in the European Union. For purposes of transferring your data to the U.S. for customer service, business operations, communications and emergencies, compliance investigations, enforcement and protection of the legal rights and claims of any JM entity, and education and training, JM bases the transfer of your data on any of the above legal bases and, in some cases, on your consent.

Your rights and choices

The GDPR gives EU data subjects certain rights regarding their personal data. Under certain conditions, you have the right to ask Johns Manville to:

- providing you with information about the processing of your personal data and providing you with access to your personal data,
 - update or correct inaccuracies in your personal data,
 - deletion of your personal data,
 - transfer a machine-readable copy of your personal data to you or to a third party of your choice,
 - restricting the processing of your personal data,
 - withdrawing the consent you have previously given us,
 - objecting to reliance on our legitimate interests as a basis for processing your personal data,
- to object to the processing of your personal data for direct marketing purposes.

These requests can be made by email to privacy@jm.com or to our mailing address below. We may request specific information from you to help us confirm your identity before processing your request. Applicable law may require or permit us to refuse your request. If we refuse your request, we will tell you the reason based on legal restrictions. If you would like to make a complaint about our use of your personal data or our response to your requests regarding your personal data, you may contact us at privacy@jm.com or file a complaint with the data protection regulatory authority in your jurisdiction (Slovakia). Information about the data protection regulatory authority can be found on the website of the European Data Protection Board at https://edpb.europa.eu/about-edpb/board/members_en.

How to contact us

You can contact Johns Manville by email or regular mail sent to this address:

Johns Manville Slovakia a.s.

Strojársená 1

917 99 Trnava, Slovakia

Contact point: Alexandra Hudecová

Phone: +421 918 346 605

E-mail: Alexandra.hudecova@jm.com

Johns

717 17th

Denver, CO 80202, USA

Contact point: Chief Data Protection Officer

Phone: 1-866-256-1943

E-mail: privacy@jm.com