

EMPLOYEE PRIVACY POLICY



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1 NIKON'S COMMITMENT TO PRIVACY

1.1 Purpose of the Policy

Nikon Metrology NV and its subsidiaries (all together referred to as **Nikon**) are committed to protecting your personal information and maintaining the accuracy, confidentiality, and integrity thereof. This privacy policy (**Policy**) describes:

- (i) the Personal Information that Nikon collects from you and about you,
- (ii) how Nikon uses the Personal Information it collected from you and for what purposes,
- (iii) to whom Nikon discloses the Personal Information it collected from you.

You will also find herein all relevant information about your rights and how to exercise these rights.

1.2 Scope of the Policy

The Policy applies to all data processing of your Personal Information that are collected and further processed as a result of your being an Employee of Nikon.

The Policy applies to all the companies of the Nikon Metrology group, which includes Nikon Metrology NV, with its offices at Geldenaaksebaan 329, 3001 Leuven, Belgium and its subsidiaries, which are located in different Member States of the European Union as well as in the United States of America and Canada. These group companies and subsidiaries are:

Nikon Metrology Europe NV Geldenaaksebaan 329 3001 Leuven Belgium Tel.: 00 32 16 74 01 01	Nikon Metrology GmbH Siemensstrasse 24 63755 Alzenau Germany Tel.: +49 6023 91 733 200
Nikon Metrology SARL Rue du Bois Chaland 39 91090 Lisses France Tel. : +33 1 60 86 09 76	Nikon Metrology UK Ltd Derby Argosy Road, DE74 2SA East Midlands Airport UK Tel.: +44 133 281 13 49
X-Tek Systems Ltd Tring Business Centre Icknield Way Tring Hertfordshire HP23 4JX UK Tel.: +44 144 282 87 00	Nikon Metrology Inc. (Canada) 55 Fleming Drive Units 13 and 14 Cambridge Ontario N1T 2A9 Canada Tel.: +1 519 885 94 90

Nikon Metrology Inc. (USA) 12701 Grand River Brighton MI 48116 USA Tel.: +1 810 220-4360	
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1.3 A Policy for Compliance

The purpose of Nikon's Policy is to comply with all national privacy legislation in each of the jurisdictions where it operates. Nikon implements additional procedures, standards, and policies wherever needed to meet the requirements imposed by the relevant national laws.

Nikon makes sure that its employees and any of its contractors, suppliers, agencies, temporary workers, or any other parties acting on Nikon's behalf (collectively referred to as **External Parties**) who collect or manage Employee Personal Information to abide by the terms described in this Policy whether they are utilizing Nikon and/or their own electronic systems and data management tools.

Nikon and its employees are responsible for ensuring that any External Parties they work with in support of Nikon's operations comply with this Policy and with any additional specific standards and procedures that are in place according to its compliance policy with regard to national privacy and data protection legislation.

2 DEFINITIONS

For the purpose of this Policy, the following terms and expressions have the meanings given to them here:

Employee or Employees: any individual working for Nikon either directly or indirectly through an outplacement agency, including without limitation employees and self-employed workers who have a contract with Nikon.

Data Controller: the natural or legal person, public authority, agency, or other body that determines either alone or jointly with others the purposes and means of personal data processing

Personal Information: any information relating to an identified or identifiable individual, the term of which is defined in Article 4.1. of the Regulation (EU) 2016/679 of 27 April 2016 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (also known as **GDPR**).

Process or Processing: any operation or set of operations that is performed on Personal Information using automated or non-automated means, such as collecting, recording, organizing, structuring, storing, adapting or altering, retrieving, consulting, using, disclosing by transmitting, disseminating, or otherwise making available, aligning or combining, restricting, erasing, or destroying, to the extent that it falls under the scope of the GDPR.

Special Categories of Personal Data: Personal Information revealing race, ethnicity, political views, religion, health, sexual orientation, trade union membership, genetic or biometric data, information about criminal convictions and offenses, and other categories defined by law.

3 COLLECTION OF PERSONAL INFORMATION

3.1 What categories of Personal Information does Nikon collect?

Nikon collects, subject to any stricter legal requirement, the following categories of information from you and about you:

- recorded images;
- identification data (name, home address, private phone number, ...);
- national Register / Social Security Identification Number;
- e-identification data (professional IP address);
- personal information (age, sex, marital status, ...);
- psychological data (character, personality, ...);
- financial situation and conditions;
- education and training;
- occupation and employment history;
- health (psychological and physical); and
- any indictments and convictions.

3.2 How does Nikon collect Personal Information?

Nikon collects your Personal Information:

- directly from **you**, and
- from **third parties** such as from recruitment agencies or other parties for the purpose of conducting a background or employment history check or obtaining an employment reference.

4 PROCESSING OF YOUR PERSONAL INFORMATION

4.1 Purposes of and legal basis for processing your Personal Information

4.1.1 Current purposes and legal basis

Purpose <i>Nikon processes your Personal Information for the purpose of:</i>	Legal ground <i>These processing activities are necessary for:</i>
- conducting its internal recruitment process	- to take necessary steps prior to entering into a contract
- carrying out the administration and management of Employees, including payroll administration, insurance management, leave administration, performance evaluations, etc.	- the performance of the contract
- planning its business and operational activities	- the performance of the contract
- fulfilling its legal obligations required by tax laws and social security and labor laws	- the compliance of legal obligations

Your Personal Information is not used in any automated decision-making, including profiling.

4.1.2 Special categories of Personal Information

Nikon collects and uses Special Categories of Personal Data, namely information relating to health. These information are only processed for the performance of the contract by Nikon, namely, where applicable, for payroll administration during certain types of leave, for meeting health and safety requirements, for providing an occupational health scheme as well as insurance and pension benefits to its Employees, etc.

4.1.3 Personal Information of Employees' relatives and their emergency contact person

Nikon collects information about your relatives (including your partner and any children) as well as your emergency contact person. By providing these information to Nikon, you admit that you have communicated the Policy to the individual whose personal information you have provided to Nikon.

4.1.4 Future purposes

If Nikon considers processing your Personal Information for other purposes than those mentioned under 4.1.1, Nikon will inform you thereof before it starts processing your Personal Information for the new purpose.

4.2 How long will your Personal Information be retained?

Your Personal Information will be retained for as long as the period when you are working for Nikon and for a maximum of 5 years after you will have left Nikon.

4.3 To whom will your Personal Information be disclosed?

For the purposes described above (see 4.1), Nikon may disclose your Personal Information to:

- Nikon's senior managers, HR managers, HR administration staff, IT administrators, facility management staff;
- social security institutions;
- public service bodies;
- payroll administrators;
- insurers; and
- other Nikon entities.

Nikon requires that any External Parties to whom your Personal Information is disclosed and that processes your Personal Information provide the same level of privacy protection as that which Nikon provides.

By way of a contract, we require data processors to process the data only in accordance with our instructions and to secure the data. These data processors must not use or disclose the information, except if such use or disclosure is authorized by Nikon and/or is made for the purpose of complying with legal requirements.

There are certain situations in which you will share Personal Information directly with service providers (e.g., pension providers) that are associated with Nikon or in which Nikon has no control over how your data is processed. In these situations, please ensure that you read and understand the privacy policies and practices of such service providers.

4.4 Transfer of Personal Information to a country outside of the European Union

Nikon operates globally, so your Personal Information can be transferred from time to time to other entities of the Nikon group, including to its headquarters in Japan as well as its subsidiaries in the United States of America and Canada.

If your Personal Information is transferred to entities located in countries whose data protection laws are not regarded as having the same level of protection as the level that the European Union gives to privacy and data protection (including, Japan, the United States of America, and Canada), Nikon ensures that necessary guarantees with regard to safeguarding privacy and your data protection are offered by entering into contracts with relevant companies whereby those contracts contain the European Commission-approved standard contractual clauses (SCC). You may obtain a copy of these SCC by sending an email to Koenraad.vanderelst@nikon.com.

4.5 Security

Nikon implements appropriate physical, administrative, and technical measures, such as anonymizing, encrypting, and accessing verifications that are designed to protect your Personal Information against accidental, unlawful, or unauthorized destruction, loss, alteration, disclosure, access, or use, and all other unlawful forms of processing.

5 YOUR RIGHTS

5.1 What are your rights with regard to Personal Information processing?

You have the right to request access to your Personal Information at any time and request that inaccurate, outdated, or no longer necessary information be corrected, erased, or restricted.

You have the right to seek the following within the limits of the applicable data protection regulations:

- the erasure of your data, especially (i) if the data are no longer necessary to be processed or retained for the purpose described in point 4.1.1, (ii) if you have withdrawn your consent to the data processing and the processing is no longer necessary for the performance of the contract, or (iii) if you object to the processing of your data (see below),
- the restriction of the processing of your data (i) for the time necessary for Nikon to verify the basis of any of your challenge about the accuracy of your data, (ii) if the processing is considered illegal, but you do not want your data to be deleted, (iii) if Nikon no longer needs your data, but you wish that Nikon retain the data for the purposes of determining, exercising, or defending your rights, (iv) if you object to the processing of your data (see below) for the time necessary for Nikon to verify the basis of your request seeking restriction to the data processing.

You have the right to object to Nikon's use of your data at any time on condition that your objection is justified on your own grounds, and such justification is within the limits of applicable data protection regulations.

You have the right to receive your data or have your data transmitted to another data controller in a structured, commonly used, and readable format.

5.2 How to exercise your rights

You can exercise the rights described above by sending a letter by email to Koenraad.vanderelst@nikon.com, indicating your decision to exercise any of those rights or by sending us the form that is available on the following URL: <https://www.nikonmetrology.com/gdpr>. After Nikon has received your letter, it will answer you as soon as possible.

If you are not satisfied with our response to your request with regard to your exercise of those rights, you may file a complaint with the data protection authority in the country where you have your habitual residence, your place of work or where the alleged infringement of your rights occurred. The coordinates of those authorities are described below.

Belgium

Commission de la protection de la vie privée
Rue de la Presse 35
1000 Bruxelles (Brussels)
Tel. +32 2 274 48 00
Fax +32 2 274 48 10
e-mail: commission@privacycommission.be
Website: <http://www.privacycommission.be/>

France

Commission Nationale de l'Informatique et des Libertés - CNIL
8 rue Vivienne, CS 30223
F-75002 Paris, Cedex 02
Tel. +33 1 53 73 22 22
Fax +33 1 53 73 22 00
e-mail:
Website: <http://www.cnil.fr/>

Germany

Die Bundesbeauftragte für den Datenschutz und die Informationsfreiheit
Husarenstraße 30
53117 Bonn
Tel. +49 228 997799 0; +49 228 81995 0
Fax +49 228 997799 550; +49 228 81995 550
e-mail: poststelle@bfdi.bund.de
Website: <http://www.bfdi.bund.de/>

The Netherlands

Autoriteit Persoonsgegevens
Prins Clauslaan 60
P.O. Box 93374
2509 AJ Den Haag/The Hague
Tel. +31 70 888 8500
Fax +31 70 888 8501
e-mail: info@autoriteitpersoonsgegevens.nl
Website: <https://autoriteitpersoonsgegevens.nl/nl>

United Kingdom

The Information Commissioner's Office

*Water Lane, Wycliffe House
Wilmslow - Cheshire SK9 5AF
Tel. +44 1625 545 745
e-mail: international.team@ico.org.uk
Website: <https://ico.org.uk>*

6 CHANGES TO THIS POLICY IN THE FUTURE

Nikon reserves the right to change this Policy at any time as far as necessary to comply with the changes in the applicable laws, regulations, practices, and procedures, or to respond to new threats or new requirements imposed by data protection authorities.

7 ANY QUESTIONS?

If you, as a Nikon Employee, have any questions about your Personal Information or the processing of your data, or if you have concerns about a potential data breach by Nikon, please email us at koenraad.vanderelst@nikon.com.