



Johns Manville Corporate Policy:  
**GDPR DATA SUBJECT RIGHTS REQUEST POLICY**  
Application: Certain EU Residents  
Effective Date: May 25, 2018

This Policy applies to all European Union (“EU”) residents for whom Johns Manville and its affiliates and subsidiaries (collectively, the “Company”) collect, use and process personal information.

Under European data protection and privacy laws, individuals have certain rights in relation to their personal information, including the right to understand how the Company uses any personal information which it collects about them. This Policy explains how the Company will deal with an individual's request to exercise each of their rights (each a "**Rights Request**").

### **Personal Information**

Personal information is information which relates to an individual, who can be identified either directly by that information or in combination with other information held or easily accessible by the Company.

Personal information includes, among other things, names, email addresses, images of the individual, employee numbers, bank details and opinions about that individual stated by others, in other words it is information about an individual whether their name is used or not, so long as it is clear that it is about that individual.

Personal information includes expressions of opinion or intended actions which relates to that individual. The definition also states that there must be an element of 'biographical significance' for the individual, and more than a casual connection between the individual and a matter/event. For example, where an individual is simply referred to as having attended a meeting, or is the author of an email, the meeting minutes and content of the email will not be personal information unless those minutes or content have the individual as their subject matter, but the fact that the individual attended the meeting or sent the email would be personal information about the individual.

### **Rights of Individuals**

Under the EU's General Data Protection Regulation (“**GDPR**”), individuals whose personal information is collected and/or used in Europe<sup>1</sup> have the following rights over their personal information which is collected, stored and used by the Company:

- (a) the right of access to personal information;
- (b) the right to rectification of personal information;
- (c) the right to erasure of their personal information;
- (d) the right to 'data portability';

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<sup>1</sup> [In these guidelines Europe means the EEA plus Switzerland.]

- (e) the right to restrict the Company's processing of their personal information; and
- (f) the right to object to the Company's processing of their personal information.

Even if personal information is collected and used by a company located outside Europe, individuals will benefit from these rights over their personal information.

Note that these rights are not unlimited; there are exceptions to these rights under the GDPR and applicable local laws. For example, it will not be possible for us to delete your data if we are required by law to keep it (e.g., for tax and account purposes), or if we hold it in connection with a contract with you. Similarly, access to your data may be refused if making the information available would reveal personal data about another person or if we are legally prevented from disclosing such information. If we decline your request, we will tell you why, subject to legal restrictions.

### **Submitting Rights Requests**

Individuals wishing to exercise any of their rights listed above should submit a request (each a "Rights Request") and are encouraged to use the forms attached to this Policy as Appendix A to this Policy. Individuals other than current Company employees submitting Rights Requests must also submit proof of identity.

Individuals should submit Rights Requests to the following Company email address:

[privacy@jm.com](mailto:privacy@jm.com)

### **Company's Response**

The Company will respond to all Rights Requests in a documented, consistent and timely manner in a way that complies with applicable data protection and privacy laws. The Company may collect, store and use personal information in a number of different European countries, and there may be slight differences in the law relating to Rights Requests across these countries. In addition to complying with the requirements of the GDPR, the Company will comply with country-specific data protection laws.

All Company employees receiving Rights Requests are required to comply with this Policy and any Company procedures and processes for replying to Rights Requests. As with all Company policies, violation of this Policy and/or applicable procedures will subject employees to discipline, which may include termination of employment.

Questions regarding this Global Data Privacy Policy should be directed to the Vice President and General Counsel, Legal and Risk Management.

**APPENDIX A  
RIGHTS REQUEST FORMS**

**Document 1 – Access Request Form**

You have the right to access and receive a copy of the personal information we hold about you. We ask that you complete this form so we can determine the scope of your request and action your request.

This process will provide you with personal information held about you, and information relating thereto, in manual and electronic form. Information exempt under applicable law(s) will not be provided to you.

Please complete your details below and sign where indicated. Send the completed form and proof of identity (by way of proof of your name and your address) to:

[privacy@jm.com](mailto:privacy@jm.com)

**Agents of the requestor:** Please note that you must provide your own contact details and you must provide proof of your entitlement to act on the data subject's behalf.

<b>Please complete as much of the following information as you can:</b>	
<b>Full name of data subject:</b>	
	(title) (last) (first)
<b>Present Address:</b>	
Town	
County	
Postcode	
<b>Other contact details:</b>	
Telephone	
Email	
Mobile:	
<b>Current/ last post held in [JM] (if applicable)</b>	
Department	
Office location	
Your employee no. (if any)	

<b>Details regarding what information you are looking for</b>	<b>To help us to respond to your request as quickly as possible, please provide as much detail as possible regarding the information you seek.</b>
<b>Hard copy files</b> (please specify department & location, if known)	
<b>Search criteria</b> ( <i>i.e.</i> name, key word, date),	
<b>Connection to file</b> ( <i>i.e.</i> employee/partner/staff/client/supplier)	
<b>Electronic data</b> (please specify system, if known)	
<b>Search Criteria</b> (please specify the search criteria, <i>e.g.</i> system name, identifier no., if known)	
<b>Connection to file</b> ( <i>i.e.</i> employee/partner/staff/client/supplier)	
<b>Any other filing system</b>	
Search criteria	
<b>Any other information to assist us in responding to your request:</b>	

We will make every effort to respond to you within 1 calendar month of the receipt of your request and valid identification documentation.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_



We will make every effort to respond to you within 1 calendar month of the receipt of your request and valid identification documentation.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_



We will make every effort to respond to you within 1 calendar month of the receipt of your request and valid identification documentation.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_



### Document 4 – Portability Request Form

Where you provide your personal information and we use it to fulfil our contractual obligations to you, or where you have consented to our use of your personal information, you have the right to 'port' that personal information. This means you have the right to receive a copy of it in a usable electronic format and to have it transmitted to another company. We ask that you complete this form so we can determine the scope of your request and action your request.

This process will provide you with certain personal information we hold about you in a format which can be read electronically, and if you wish this can be sent to another company.

Please complete your details below and sign where indicated. Send the completed form and proof of identity (by way of proof of your name and your address) to:

[privacy@jm.com](mailto:privacy@jm.com)

**Agents of the requestor:** Please note that you must provide your own contact details and you must provide proof of your entitlement to act on the data subject's behalf.

Please complete as much of the following information as you can:	
<b>Full name of data subject:</b>	
	(title) (last) (first)
<b>Present Address:</b>	
Town	
County	
Postcode	
<b>Other contact details:</b>	
Telephone	
Email	
Mobile:	

<b>To help us to respond to your request as quickly as possible, please provide as much detail as possible regarding the personal information you seek. If you wish to 'port' all applicable personal information, please write 'all' below</b>	<b>Names and contact details of companies to which that data should be transmitted</b>
<i>e.g. all information I have uploaded to the website; payment details; billing and delivery addresses.</i>	

We will make every effort to respond to you within 1 calendar month of the receipt of your request and valid identification documentation.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_



We will make every effort to respond to you within 1 calendar month of the receipt of your request and valid identification documentation.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_



We will make every effort to respond to you within 1 calendar month of the receipt of your request and valid identification documentation.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_