

Johns Manville – EU Job Applicant Privacy Notice

Updated: March 2021

Johns Manville Slovakia, a.s., a subsidiary of Johns Manville (collectively, “Johns Manville”, “we”, “us”, “our”), is committed to fulfilling our responsibilities under the European Union’s General Data Protection Regulation (“GDPR”) in relation to the collection, retention, use, and other processing of personal data that is obtained through the recruitment and hiring process.

This Privacy Notice sets forth how we process EU personal data in our role as a data controller in the job recruitment and hiring process. It also tells you how you can exercise your rights (including the right to object to certain processing activities). More information about your rights and how you can exercise them is set out in the **“Your Rights and Choices”** section below.

Note that as part of our job recruitment and selection process we will share your personal data with the manager(s) responsible for the position you are applying for. Depending on the position, this may mean that we share your personal data with managers employed by another Johns Manville entity, including Johns Manville entities located outside the European Economic Area (“EEA”). For example, for certain positions we may share your personal data with manager(s) located at our headquarters in the United States. When sharing personal data with managers 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 data.

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 identification details, for example 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 fulfill job requirements.
- Information about your current compensation, including benefit entitlements.
- Data you submit in résumés / CVs, letters, writing samples, or other written materials necessary for evaluation of employment.
- Data generated by interviewers and recruiters based on interactions with you.
- Other information otherwise related to your employment at Johns Manville.

Depending on the job you are applying for, we may conduct background checks. These checks can relate to any criminal convictions that you may have. Background checks are performed in accordance with applicable law. Before conducting a background check, we will obtain your prior consent, unless such consent is not 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 the information, we may not be able to process your application properly, or at all.

How and Why We Use Your Personal Data

We may process personal data to:

- Assess your suitability for employment for the role for which you are applying, as well as future roles that may become available.
- Perform recruitment-related administrative functions.
- Perform analysis of our applicant pool based on the recruiting information you provide to better understand who is applying to positions at Johns Manville.

Our processing of such personal data is carried out pursuant 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 in order to take steps at your request prior to entering into such a contract.
- We have a **legal obligation** to process your personal data, such as 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 those of others**.
- We have a **legitimate interest** in using your personal data. In particular, we have a legitimate interest in the recruitment of suitable personnel and the effective administration and management of staff.

Johns Manville may process special categories of personal data as required and permitted by applicable Member State law. Before processing special categories of personal data, we will obtain your consent, unless such consent is not required by law.

At this time, Johns Manville does not make any decisions in the hiring process using automated means.

If we make a material change to how we process your personal data, we will notify you and may also modify this Privacy Notice.

How We May Share Your Personal Data

We may share your personal data:

- Internally with our parent company, affiliates, subsidiaries, and other business units and departments within Johns Manville for our general business and workforce management purposes. This may include, for example, members of the human resources and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy, and IT staff if access to the data is necessary for the performance of their roles.

- With third parties who we work with for providing us with services, such as hosting, supporting, and maintaining any recruiting platforms.
- Should we make you an offer of employment, with former employers to obtain references for you (if we have a reasonable interest in verifying your information and this is necessary for verification purposes or if you have allowed us to contact your former employer) and with employment background check providers to obtain any necessary background checks, to the extent such background checks are permitted by applicable law and 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, in which case we may disclose your personal data to the prospective seller or buyer (and/or its advisors). The recipient of the personal data will process the data as described in this notice and/or provide additional notice in accordance with applicable law.
- To abide by applicable law or protect our rights and interests. For example, we may disclose your personal data if we determine that such disclosure is reasonably necessary to comply with the law, protect our or others' rights, property, or interests, or prevent fraud or abuse.

How Long We Retain Your Personal Data

We will retain your personal data for no longer than is necessary for the performance of our obligations or to achieve the purposes for which the information was collected, or as may be permitted under applicable law. In general, your application data will be stored for one year after the close of the position to which you applied, unless otherwise required by legal or regulatory requirements.

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

Personal Data Transfers

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

We have put in place appropriate safeguards (such as contractual commitments) in accordance with applicable data protection laws to ensure that your Data is adequately protected. For more information on the appropriate safeguards in place, please contact us at the details below.

To ensure that these transfers comply with legal requirements, including the GDPR, the Company, JM and JM's other EU subsidiaries have entered into an inter-company agreement incorporating European Commission-approved contractual clauses (the Standard Contractual Clauses). The inter-company agreement sets forth the legal requirements for JM's use of the Data and describes the technical and organizational measures JM uses to protect and secure the Data. For transfers to the USA, there is currently no adequacy decision by the EU Commission

within the meaning of Art. 45 (1) GDPR. This means that the EU Commission has not yet positively determined that the country-specific level of data protection in the USA corresponds to that of the European Union under Art. 6 GDPR. The GDPR requires so-called-suitable guarantees for a data transfer to such a third country like the USA. For example, guarantees like Standard Contractual Clauses ("SCC") and Binding Corporate Rules approved by a supervisory authority ("BCR"). Given the ruling by the European Court of Justice ("CJEU") issued in July 2020, the existing SSC with JM USA for data transfers to the USA does not provide an absolute guarantee that data protection of your personal data in the USA corresponds to level of protection in the European Union. For the purposes of transferring your data to the USA for customer service, business operations, communications and emergencies, compliance investigations, establishing enforcing and defending the legal rights and claims of any JM entity, and education and training, JM bases the data transfer on any of the legal basis listed above and in some cases your consent.

Your Rights and Choices

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

- Provide you with information about our processing of your personal data and give you access to your personal data.
- Update or correct inaccuracies in your personal data.
- Delete your personal data.
- Transfer a machine-readable copy of your personal data to you or a third party of your choice.
- Restrict the processing of your personal data.
- Withdraw consent that you have previously given us.
- Object to reliance on our legitimate interests as the basis for processing of your personal data.
- Object to our processing of your personal data for direct marketing purposes.

You can submit these requests by email to privacy@jm.com or our postal address provided below. We may request specific information from you to help us confirm your identity prior to processing your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions. If you would like to submit 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 submit a complaint to the data protection regulator in your jurisdiction (Slovakia). You can find information about your data protection regulator by visiting the European Data Protection Board's website at https://edpb.europa.eu/about-edpb/board/members_en.

How to Contact Us

Johns Manville can be contacted via e-mail or regular mail sent to the following address:

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E-mail: privacy@jm.com