

Global Employee and Staff Privacy Notice

SCOPE AND OVERVIEW

Hunter Douglas Group Limited and its subsidiaries (collectively referred to as “**Hunter Douglas**” or the “**Company**”) are committed to protecting the privacy and security of your personal information. This Privacy Notice describes how we collect, use, maintain, secure, and disclose (collectively, “**process**”) personal information about you before, during, and after your working relationship with us, in accordance with applicable data protection and privacy laws. This Privacy Notice also describes your rights regarding the personal information that we hold about you.

This Privacy Notice applies to all current and former employees, workers, contractors, and any other individuals who are working for the Company but are not directly employed (collectively, “**staff member(s)**” or “**you**”). This Privacy Notice applies to staff members located in the Americas, Europe, the Middle East, Africa, Asia, and Oceania.¹

Please read this Privacy Notice carefully.

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1. Personal Information We Collect About You

We collect, store, and process different types of personal information to carry out our activities and obligations as an employer, some of which is required to administer the employment or other working relationship with you.

Here are examples of the categories of personal information we may collect and how we process that information.

¹ This Privacy Notice is subject to works council consultation requirements where applicable.

Context	Examples of Categories of Information	Primary Purpose for Processing Information
Identification Information	Name, date of birth, employee identification number, government-issued identification number (e.g., driver's license number, state identification card, passport, national identification number, birth certificate, social security number, etc.), residency and work permit status, and other similar documents used to verify work eligibility.	We process this type of information for our legitimate business purposes, including general human resources administration and to comply with legal obligations, such as employment eligibility verification laws.
Contact Information	Home address, telephone number(s), e-mail address(es), beneficiary and emergency contact details, and other similar contact information.	<p>We process this type of information to fulfil our contractual obligations to you, including managing our employment or working relationship with you (e.g., communicating with you).</p> <p>We also process this type of information for our legitimate business purposes, such as to assist you in the case of an emergency, including maintenance of contact details for you and your dependents or emergency contacts in the case of a personal or business emergency.</p>
Payroll and Taxes	Rate of pay, salary, bonus, bank account details, tax status and withholding information (i.e., marital status, dependents, etc.), social security number or other taxpayer/government identification number, and other information necessary to administer payroll and taxes.	We process this type of information to fulfil our contractual obligations to you, including administering payroll and benefits, making expense reimbursements and other compensation-related payments, and tax reporting.
Benefits	Spouse, beneficiary, and dependents information, retirement account information, paid and unpaid leaves of absence, and other information necessary to administer benefits.	We process this type of information to fulfil our contractual obligations to you, including administering and maintaining benefits, such as medical dental, optical, additional wellness programs, 401(k) and/or

		retirement plans and additional fringe benefit programs, including recording and processing eligibility of dependents, absence and leave monitoring, and insurance.
Health Related	Information about job-related medical conditions that impact your ability to perform your job with or without a reasonable accommodation, and health and sickness related information related to reasons for time away from work.	We process this type of information for our legitimate business purposes (where permissible and in accordance with applicable law), including ascertaining your fitness to perform your job duties with or without a reasonable accommodation, managing absences from work, and complying with legal obligations related to health and safety.
Demographic Data	Please note, we are required to collect and report certain demographic workforce data to government agencies for enforcement purposes. Your submission of this information is voluntary. This includes gender as well as more sensitive personal information (also known as special category data) including information relating to racial and ethnic origin, religious, political, or philosophical beliefs, and trade union membership. We may also ask you to voluntarily self-identify whether you belong to additional protected classes (disability status, sexual orientation, veteran status, etc.) to promote diversity, equity, and inclusion within the Company.	We process this type of information for a variety of reasons, and this will vary in the different jurisdictions in which we operate. In some jurisdictions, we are required to collect and report certain demographic workforce data to government agencies. We also process this type of information for our legitimate business purposes (where permissible and in accordance with applicable law), including promoting diversity, equity, and inclusion within the company.
Recruitment	Educational and professional background information, such as academic and professional qualifications, education, CV/Resume, reference letters, interview notes, credit history and criminal records data (utilized for background check and vetting	We process this type of information for our legitimate business purposes, including determining eligibility for hiring, verifying references and qualifications, and making business decisions about your recruitment or employment.

	<p>purposes where permissible and in accordance with applicable law).</p>	<p>We also process this type of information to fulfil our obligations under your employment contract, offer letter, or other commitments we've made to you, including general human resources administration and business management.</p>
<p>Terms of Employment</p>	<p>Employment details, such as your job titles/position, office location, letters of offer and acceptance of employment, and/or employment agreements or other working arrangements, hire/re-hire date, termination date, performance history, disciplinary information, professional memberships, and business travel arrangements, leave of absence, sick time, and vacation/holiday records.</p>	<p>We process this type of information to fulfil our obligations under your employment contract, offer letter, or other commitments we've made to you, including managing our employment or working relationship with you, conducting performance reviews, managing and determining performance requirements, making decisions about salary reviews and compensation, assessing qualifications for a particular job or task, including decisions about promotions, making decisions about your continued employment or engagement.</p> <p>We also process this type of information for our legitimate business purposes, including general business management and operations, accounting, and auditing.</p>
<p>Qualifications and Training</p>	<p>We collect information from individuals concerning the training that they receive from us, or from third parties. Where applicable, we also collect information related to licensing and certifications.</p>	<p>We process this type of information for our legitimate business purposes, including establishing training and/or development requirements, understanding and recording qualifications of the individuals that work with us, and in some cases complying with any statutory, regulatory, or contractual obligation regarding the training or qualification of certain staff.</p>
<p>Investigations</p>	<p>Details of any workplace investigations.</p>	<p>We process this type of information for our legitimate business purposes, including ensuring a safe working</p>

		environment and investigating all information related to potential violations of workplace policies, procedures, protocols, concerns, and/or complaints.
IT and Communications Information	Information about your use of our information technology (IT) and communications systems.	We process this type of information for our legitimate business purposes (where permissible and in accordance with applicable law), including managing network and IT systems security, monitoring the use of our IT and communication systems, ensuring compliance with our internal policies and procedures, protecting confidential information, intellectual property, and other business interests, and investigating unlawful or improper acts.
Video, Voice and Images	Audio visual information, such as photographs, video images like closed-circuit television (“CCTV”), call monitoring records, and voicemails.	We process this type of information for our legitimate business purposes (where permissible and in accordance with applicable law), including compiling and maintaining internal directories (such as directories of employees and staff), securing our facilities and equipment, and protecting our property.

2. How We Collect Your Personal Information

Most often, we collect personal information from you directly, including through the application and recruitment process as well as in the course of your employment or working relationship with us.

In some cases, we also collect personal information about you from third parties, such as employment agencies, former employers, personal and professional references, or public sources. For example, before and during the course of your employment or working relationship with us, we may collect information from public social media sources, such as your LinkedIn profile, for recruitment purposes. We may also conduct lawful background screenings, to the extent permitted by law, through a third-party vendor for information about your past education, employment, credit and/or criminal history. Before we conduct a background check, we will provide you with acknowledgement and authorization forms. Additionally, if there is an investigation of an

employee matter, we may obtain information relevant to the incident from external sources including private parties and/or law enforcement.

We will also collect additional personal information in the course of job-related activities. This may include monitoring communications and use of Company IT equipment and systems, or from other staff members or supervisors.

If you fail to provide certain personal information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit) or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our employees).

3. How We Process Your Personal Information

In addition to the purposes and uses described elsewhere in this Privacy Notice, we may process your personal information for the following purposes:

- To manage your employment or other working relationship with us, including payroll and benefits administration, business management and planning, processing employee work-related claims (for example, insurance and worker's compensation claims), accounting and auditing, conducting performance reviews and determining performance requirements, and assessing qualifications for a particular job or task.
- To comply with applicable legal and regulatory obligations, including those related to labor and employment, health and safety, tax, and anti-discrimination laws.
- To ensure a safe working environment, including investigating potential misconduct.
- To protect health and safety in the workplace.
- To detect and protect against malicious, deceptive, fraudulent, or illegal activity, violations of our policies, or other types of wrongdoing.
- To enforce, exercise, or defend legal claims, and enforce disciplinary actions or termination.
- To ensure network and information security, including preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution. This may include monitoring communications and use of Company IT equipment and systems (where permitted by, and in accordance with, applicable law).
- To conduct data analytics analyses to review and better understand employee retention and attrition rates.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

- For other lawful or legitimate purposes which may be reasonably necessary to plan, organize, and carry out administrative tasks required for day-to-day operations.

You will not be subject to decisions based on automated data processing without your prior consent.

4. How We Share Your Personal Information

In addition to the specific situations discussed elsewhere in this Privacy Notice, we share your personal information in the following situations, where permitted or required by applicable law:

- **Affiliates.** We share your information with our subsidiaries and affiliates in the course of our normal business operations.
- **Business Transactions.** We may share your information with a potential buyer (and its agents and advisors) in connection with any proposed merger, acquisition, or any form of sale or transfer of some or all of our assets (including in the event of a reorganization, dissolution, or liquidation), in which case, personal information held by us about you will be among the assets transferred to the buyer or acquirer.
- **Other Staff Members.** Other individuals within the Company may have access to your information. For instance, all staff members can access phone and electronic directories, as well as staff member birthdays (month and day), work anniversaries, recognition awards, and other similar information that may be posted on the Company intranet from time to time. Depending upon the type of processing and its purposes, your personal information may be shared with staff members within the Human Resources, Finance or IT Department, staff members in charge of the security of Company facilities, your supervisor, and your supervisor's supervisor.
- **Service Providers.** We share your information with our contractors, vendors, and service providers that assist us with administering the employment or working relationship with you and/or provide services to us or on our behalf. For example, service providers may include, but are not limited to, payroll processors, benefits administration providers, data storage or hosting providers, marketing/events agencies, and recruitment agencies.
- **Other Third Parties.** We may share certain information with third parties who provide professional services (such as attorneys, auditors, accountants, and management consultants), professional bodies, and regulatory authorities in the normal course of business.
- **Legal or Regulatory Requests and Investigations.** We may disclose your information to third parties under the following circumstances: (i) to comply with relevant laws or regulations, to respond to a court order, administrative or judicial process, such as a subpoena, warrant, court order, or government audit; (ii) in response to lawful requests by public authorities (such as national security or law enforcement); and (iii) as necessary to establish, exercise or defend against potential, threatened or

actual litigation (such as adverse parties in litigation). We may also need to share your information with tax authorities, courts, regulators, the police, and other governmental authorities where we are required or permitted to do so by law.

- **Protection of the Company or Others.** We may share your information where necessary to protect the Company, including to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies.
- **Disclosures with Your Consent.** We may ask to share your information with other unaffiliated third parties who are not described elsewhere in this Privacy Notice. For example, we may share your information with third parties to whom you or your representatives authorize us to disclose personal information in connection with products or services we or they provide to you.

5. How Long We Retain Your Personal Information

Except as otherwise permitted or required by applicable law or regulation, we endeavour to retain your personal information only for as long as necessary to fulfil the purposes for which it was collected, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes. To determine the appropriate retention period for personal information, we consider applicable legal requirements, the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, and the purposes for which we process your personal information.

Generally, this means we will keep your personal information until the end of your employment or other working relationship with us, plus a reasonable period of time thereafter (typically, a maximum of 7 years) where necessary for the following reasons: to respond to any employment inquiries or legal, tax, accounting or administrative matters; or to provide you with ongoing benefits. We may retain your personal information for a longer period of time where the law requires or authorizes us to do so or in connection with legal proceedings.

6. How We Protect Your Personal Information

We maintain reasonable physical, technical, and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to help protect your personal information against loss, unauthorized access or disclosure, modification, or destruction. Although we use reasonable efforts to protect your personal information, we cannot guarantee the security of your personal information. In the event that we are required by law to inform you of any privacy or security event relating to your personal information, we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

7. International Transfers

As a multi-national company, we transmit information between and among our affiliates and other legal entities. As a result, your personal information may be processed in a country outside of your home jurisdiction. Some of these countries may have data protection laws that may be less stringent than the laws in your country.

If you are a staff member in the United Kingdom (“UK”) and/or European Union, we may transfer your personal information outside the UK and/or European Economic Area (“EEA”) to countries such as the United States of America. Such transfers may be made for the following reasons:

- To store the information;
- To enable us to provide HR services to you;
- Where legally required; or
- To facilitate the operation of our group of businesses, when it is consistent with our legitimate business interests.

Nonetheless, where possible, we take steps to treat personal information using the same privacy principles that apply pursuant to the law of the country in which we first received your information. For example, where your information is transferred outside the UK and/or EEA, we will take all steps reasonably necessary to ensure that your data is subject to appropriate safeguards to protect your personal information, including through the use of Standard Contractual Clauses or other lawful transfer mechanism.

If you would like more information about the transfer of your information or about the safeguards we put in place, please contact us using the details under the “Contact Information” section below. You may also request a copy of any Standard Contractual Clauses we use for the transfer of your data outside of the UK and/or EEA, which includes the categories of information transferred.

8. Your Choices

Some jurisdictions give you a right to make the following choices regarding your personal information:

- Request access to and obtain a copy of the personal information we have about you, or confirm that we have information about you, including information about how we process your personal information;
- Request correction (or rectification) of any inaccurate or incomplete personal information we have about you;
- Request erasure (or deletion) of your personal information, subject to certain limitations and exceptions;
- Restrict or object to the processing of your personal information under certain circumstances; and

- If applicable, request to receive access to your personal information in a portable, machine-readable format.

In most situations, our processing of your personal information is not based upon your consent. However, if we rely on your consent to process your personal information, you may revoke your consent to such processing.

Please note, not all of these rights are absolute, and they do not apply in all circumstances. In some cases, we may limit or deny your request because the law permits or requires us to do so.

If you want to exercise any of the above rights, please contact your local head of human resources in writing or contact us as indicated in the “Contact Information” section below. We may request specific information from you to help us confirm your identity, verify your rights, and respond to your request, including to provide you with the personal information that we hold about you, if applicable.

9. Sensitive Information Disclosure

Some of the personal information we collect as described above is considered “sensitive personal information” under various jurisdictions. We collect the following categories of sensitive personal information: racial or ethnic origin, religion or philosophic belief, sexual orientation, Trade Union membership, physical or mental health condition or disability, offenses or alleged offenses, criminal and regulatory proceedings, outcomes, and sentences, and biometric data. This information is collected in order to administer your relationship with us, including fulfilling any obligation that we have to provide you with compensation and/or benefits; determine eligibility for employment; conduct background checks (where permitted by applicable law); comply with applicable laws and regulations; create, maintain, and secure online employee accounts; business travel; manage and monitor employee access to Company facilities, equipment, and systems; investigate and enforce compliance with and potential breaches of the Company’s internal policies and procedures; and exercise or defend the legal rights of the Company and its employees and affiliates, customers, contractors, and agents.

10. Changes to this Privacy Notice

We may update or change this Privacy Notice from time to time. You can see when this Privacy Notice was last updated by referring to the date at the end of this Privacy Notice. To the extent we make material changes, the Privacy Notice that was in place at the time you submitted personal information to us will generally govern that information.

11. Contact Information

If you have any questions about this Privacy Notice, would like additional information, or would like to make a request to exercise any of your rights, please contact the Compliance team via the information below. You can also submit a question on the Ethics Helpline, available at hdethics.listeningline.com.

Email: privacy@hunterdouglas.com

Phone: 845-664-7000

Postal Address: 1 Blue Hill Plaza, Pearl River, NY 10965, United States

If you are not satisfied with our response, and are in the European Union or United Kingdom, you may have a right to lodge a complaint with your local supervisory authority.

Effective Date: April 10, 2023