

Milliken & Company

General Data Protection Policy

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Revised: 25 May 2018

Approved by: Kate Standing, Milliken Data Protection Manager

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1. POLICY STATEMENT

- 1.1 Everyone has rights with regard to the way in which their Personal Data is handled. During the course of our activities as a manufacturer and supplier of goods and services, we will collect, store and process Personal Data about our employees (current and former), customers, suppliers and other third parties, and we recognise that the correct and lawful treatment of this data will maintain confidence in the organisation and will provide for successful business operations.
- 1.2 Anyone who uses the Data as part of their job requirements is obliged to comply with this policy when processing Personal Data on the company's behalf. A breach of this policy may result in disciplinary action.

2. SCOPE

- 2.1 This policy applies worldwide to Milliken and its subsidiaries and affiliates over which Milliken has management control, and to all directors, officers and employees of Milliken.
- 2.2 The types of Personal Data that Milliken may be required to handle include information about current, past and prospective suppliers, customers, employees and other third parties with whom we communicate. The Personal Data, which may be held on paper or on a computer or other media, is subject to certain legal safeguards.
- 2.3 This policy and any other documents referred to in it sets out the basis on which we will process any Personal Data we collect from individuals or that is provided to us by Data Subjects or other sources.

3. DEFINITION OF DATA PROTECTION TERMS

- 3.1 **Company** means each legal entity belonging to Milliken that has implemented this Policy.
- 3.2 **Data** is information which is stored electronically, on a computer, or in certain paper-based filing systems.
- 3.3 **Data Subjects** for the purpose of this policy include all identified or identifiable natural persons about whom we hold and process Personal Data from any country in the world. All data subjects have legal rights in relation to their Personal Data.
- 3.4 **Personal Data** means any information relating to an individual person ("Data Subject"); in particular an identifier such as a name, an identification number,

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location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

- 3.5 **Data Controller** means the person, company, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data. Milliken is the data controller of all Personal Data used in Milliken's business for Milliken's own commercial purpose.
- 3.6 **Data Processor** means a natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Data Controller. For the purpose of this Policy, data processor means any person or organisation who processes Personal Data on behalf and on the instructions of Milliken.
- 3.7 **Milliken** means Milliken & Company and its subsidiaries and affiliates that form part of the Milliken group from time to time, including its manufacturing facilities, sales and service operations over which Milliken has management control. This Policy shall apply to all new subsidiaries and/or affiliates following an acquisition after an integration period of 90 days.
- 3.8 **Processing** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- 3.9 **Recipient** means a person, company, public authority, agency or another body, whether a third party or not, to which the Personal Data may be disclosed. However, public authorities that may receive Personal Data in the framework of a particular inquiry will not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.
- 3.10 **Sensitive Personal Data** means data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of uniquely identifying a person, data concerning health or data concerning a person's sex life or sexual orientation.

4. DATA PROTECTION PRINCIPLES

- 4.1 Milliken has adopted the following principles to govern its processing of Personal Data, except as specifically provided by supplementary policies or as required by applicable laws or regulations.

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- 4.2 Personal Data shall:
- (i) only be processed lawfully, fairly, and in a transparent manner in relation to the Data Subject (“lawfulness, fairness, and transparency”);
 - (ii) be obtained only for specified, explicit, and legitimate purposes, and shall not be further processed in any manner incompatible with those purposes (“purpose limitation”);
 - (iii) be adequate, relevant, and not excessive in relation to the purposes for which they are processed (“data minimization”);
 - (iv) be accurate and, if necessary, kept current, as appropriate to the purposes for which they are processed (“accuracy”);
 - (v) not be kept in a form that permits identification of the Data Subject for longer than necessary for the permitted purposes (“storage limitation”); and
 - (vi) be processed in a manner that ensures appropriate security of the Personal Data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures (“integrity and confidentiality”).
- 4.3 Milliken shall be responsible for, and be able to demonstrate compliance with the above-mentioned principles (“accountability”).
- 4.4 Personal Data shall be processed in accordance with the rights of the Data Subjects under applicable data protection laws and regulations.
- 4.5 Personal Data shall only be processed in accordance with the original purpose for which it was collected. As long as the processing is compatible with the purposes for which the Personal Data were initially collected, no additional legal basis for processing of that data is required.

5. FAIR AND LAWFUL PROCESSING

- 5.1 Personal Data shall not be processed unless one of the following legal bases applies:
- (i) the Data Subject has provided a valid, informed consent for one or more specific purposes;
 - (ii) processing is necessary for the performance of a contract to which the Data Subject is a party or in order to take steps at the request of the Data Subject prior to entering into a contract;

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- (iii) processing is necessary for the compliance with Milliken's legal obligation(s);
- (iv) processing is necessary to protect the vital interests of the Data Subject; or
- (v) processing is necessary for pursuing the legitimate interests of Milliken or of a third party or parties to whom the Personal Data is disclosed.

There may be exceptions where such interests are overridden by the fundamental rights and freedoms of the Data Subject requiring additional protections e.g. where the Data Subject is a child. Examples of legitimate interests include (but are not limited to) the following: 1) a relevant and appropriate relationship between the Data Subject and the Data Controller in situations such as where the Data Subject is a client or in the service of the Data Controller; 2) The processing of Personal Data to the extent strictly necessary and proportionate for the purposes of ensuring network and information security; 3) Data Controllers that are part of a group of undertakings or institutions affiliated to a central body may have a legitimate interest in transmitting Personal Data within the group of undertakings for internal administrative purposes, including the processing of clients' or employees' Personal Data. 4) The processing of Personal Data for direct marketing purposes; 5) The processing of Personal Data strictly necessary for the purposes of preventing fraud.

6. DISCLOSURE AND SHARING OF PERSONAL DATA

- 6.1 Milliken may share Personal Data that it holds with any member of its group, which means its subsidiaries, its ultimate holding company and its affiliates.
- 6.2 Milliken may also disclose Personal Data it holds to third parties:
 - a) In the event that Milliken sells or buys any business or assets, in which case Milliken may disclose Personal Data it holds to the prospective seller or buyer of such business or assets.
 - b) If Milliken or substantially all of our assets are acquired by a third party, in which case Personal Data Milliken holds will be one of the transferred assets.
 - c) If Milliken is under a duty to disclose or share a Data Subject's Personal Data in order to comply with any legal obligation, or in order to enforce or apply any contract with the Data Subject or other agreements; or to protect Milliken's rights, property, or safety of its employees, customers, suppliers or others. This includes exchanging information with other Recipients for the purposes of fraud protection and credit risk reduction.

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- d) To the extent an adequate service provider contract is in place incorporating required data protection measures.

7. NOTIFYING DATA SUBJECTS & TRANSPARENT INFORMATION TO DATA SUBJECT

7.1 Milliken will take appropriate measures to provide any information required under applicable data protection laws and regulations, and all communications shall be concise, transparent, intelligible and in an easily accessible form, using clear and plain language. The information will be provided in writing or other means, including, where appropriate, by electronic means.

7.2 As a minimum, Milliken will provide the Data Subject with the following information:

(i) the identity and the contact details of the Milliken entity responsible for the data processing;

(ii) the contact details of the Milliken Data Protection Manager, where applicable;

(iii) the purposes of the processing for which the Personal Data are intended;

(iv) the Recipients or categories of Recipients of the Personal Data, if any, that Milliken will disclose Personal Data to;

(v) where applicable, the fact that Milliken intends to transfer Personal Data to a third country and whether there are appropriate or suitable safeguards for the international data transfer; and

(vi) the existence of the Data Subject rights regarding the data processing and the means, if any, with which Data Subjects can limit the use and disclosure of their Personal Data.

7.3 Where Milliken intends to process the Personal Data for an alternative purpose than that for which it was initially collected, Milliken will notify the Data Subject prior to processing its Personal Data for a different purpose.

8. DATA SECURITY

8.1 Milliken will implement and maintain appropriate technical and organizational measures to ensure a level of security appropriate to the risk. Such risk analysis includes an analysis of the risk of compromising the rights of the Data Subject, costs of implementation, and the nature, scope, context and purposes for Data Processing. In particular, Milliken will implement and maintain appropriate measures to protect against accidental or unlawful destruction, loss, alteration,

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unauthorized disclosure of, or access to any Personal Data transmitted, stored or otherwise processed by Milliken or its third parties.

- 8.2 Milliken will put in place procedures and technologies to maintain the security of all Personal Data from the point of collection to the point of destruction. Personal Data will only be transferred to a Data Processor if the Data Processor agrees to comply with those procedures and policies, or implements adequate measures independently.
- 8.3 Milliken has a suite of policies referencing the security measures in place, including the overarching Information Security Policy, which can be provided upon request.
- 8.4 Security procedures include:
- a) **Entry controls.** Technical and organizational measures to control access to premises and facilities, particularly to check authorization are in place. Any stranger seen in entry-controlled areas should be reported. Technical (ID/password security) and organizational (user master data) measures for user identification and authentication are implemented for all electronic systems including segregation of duties and restrictions based on job need.
 - b) **Secure lockable desks and cupboards.** Desks and cupboards should be kept locked if they hold confidential information of any kind. (Personal Data is always considered confidential.)
 - c) **Methods of disposal.** Paper documents should be confidentially destroyed. Digital storage devices should be physically destroyed when they are no longer required.

9. DATA SECURITY BREACH RESPONSE

- 9.1 Milliken will address Data security breaches or incidents and will implement and maintain appropriate data security breach response plans.

10. INTERNATIONAL DATA TRANSFERS

- 10.1 Milliken may transfer Personal Data from countries in which the data was originally collected to other countries. It is Milliken's policy when engaging in such data transfers to comply with applicable legal requirements including any data transfer restrictions of local laws or regulations.

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11. RESPONSIBILITIES

- 11.1 All directors, officers, and employees are required to comply with applicable data protection laws and regulations and are responsible for being familiar with data protection laws and regulations applicable to their roles within the Company.
- 11.2 Any director, officer, or employee who violates this policy, or who orders or knowingly permits a subordinate to violate this policy, shall be held accountable and be subject to appropriate disciplinary action, including oral or written warnings, potentially termination of employment subject to applicable local law and regulations.

12. IMPLEMENTATION

- 12.1 This Policy shall be applicable and implemented by all entities of Milliken in their respective country and each director, officer and employee shall confirm his or her understanding and acceptance of this Policy in accordance with the local requirements.

13. MISCELLANEOUS

- 13.1 This Policy shall be effective as of 25 May 2018. Milliken reserves its right to revise and amend this Policy from time to time.

14. CONTACT INFORMATION

- 14.1 If you have any questions about this Policy, its scope or purpose, or about applicable data protection laws and regulations please contact the Milliken Legal Department or the Milliken Data Protection Manager (Privacy@milliken.com).