DATA PRIVACY POLICY / QUEBEC SUPPLEMENT

ADDITIONAL RULES TO BE OBSERVED BY COMPANIES SUBJECT TO THE QUEBEC DATA PRIVACY REQUIREMENTS

ANDRITZ and its affiliated companies (collectively "ANDRITZ") are committed to maintaining the accuracy, confidentiality, and security of personal information collected and processed through their business activities.

This **Quebec Supplement** applies to all ANDRITZ legal entities based in Quebec or otherwise collect and store personal information in Quebec. These entities must comply with the below framework (and the rules outlined in section 4 of the Group Data Privacy Policy) to ensure they meet the requirements of the personal information laws that apply to private sector enterprises in Quebec (the "Data Privacy Law").[1]

1 QUEBEC PRIVACY OFFICER

All questions regarding the Data Privacy Law, the **ANDRITZ Data Privacy Policy**, individual data-privacy rights, or ANDRITZ's use of personal information should be directed to the following:

Quebec Privacy Officer: Ramsey Kazem and Pina Trentadue
Phone: +1(514) 428.6897
Email: legalservices_canada@andritz.com

2 ROLES AND RESPONSIBILITIES

Ensuring compliance with the requirements of the Data Privacy Law and the obligations outlined in the **ANDRITZ Data Privacy Policy** is a joint responsibility across the organization. The roles and responsibilities of ANDRITZ personnel are as follows:

Function	Data Privacy / Protection Responsibilities
All Employees / Functions	▫ Keep personal information secure by taking sensible precautions and following the guidelines in the **ANDRITZ Data Privacy Policy**. ▫ Report actual, potential, or suspected data protection-related compliance failures or violations of the standards outlined in the **ANDRITZ Data Privacy Policy** to the Quebec Privacy Officer by completing a *Privacy Incident Form*. The Quebec Privacy Officer will record the incident in the *Privacy Incident Log*.

[1] The **Quebec Supplement** and the *Group Data Privacy Policy* are collectively referred to as the ANDRITZ Data Privacy Policy.

	▫ Identify any project or business activity that will require a *Privacy Impact Assessment* as described in **section 8**, and request guidance from the Quebec Privacy Officer in completing this requirement. ▫ Request guidance from the Quebec Privacy Officer when uncertain about any issues related to the Data Privacy Law or the **ANDRITZ Data Privacy Policy**. ▫ Refer requests from individuals exercising their rights under the Data Privacy Law as described in **section 7** to the Quebec Privacy Officer without delay. ▫ Refer any new or changed contract or agreement with a third-party business partner who may handle personal information to the ANDRITZ-Legal function.
Quebec Privacy Officer	▫ Coordinate with other functions to ensure ANDRITZ meets the requirements of the Data Privacy Law. ▫ Ensure reports of data protection-related compliance failures or violations of the standards outlined in the **ANDRITZ Data Privacy Policy** are properly documented by assisting employees in completing a *Data Privacy Incident Form*. ▫ Maintain a log documenting reports of data protection-related compliance failures or violations of the standards outlined in the **ANDRITZ Data Privacy Policy**. Regularly review and update the *Privacy Incident Log*. ▫ Respond to inquiries and requests from individuals exercising their rights under the Data Privacy Law as described in **section 7**. ▫ Evaluate projects or business activities to determine whether a *Privacy Impact Assessment* as described in **section 8** is needed. ▫ Support the business in performing *Privacy Impact Assessments* as described in **section 8**. ▫ Collaborate with the ANDRITZ Legal function to ensure agreements with third-party business partners include appropriate data privacy/protection contract clauses. ▫ Respond to correspondence from the Quebec *Commission for the Access to Information*. ▫ Respond to questions from ANDRITZ personnel regarding issues or concerns about the Data Privacy Law or the **ANDRITZ Data Privacy Policy**.

Compliance	▫ **ANDRITZ Data Privacy Policy** owner. ▫ Support the Quebec Privacy Officer in meeting their responsibilities outlined in the Data Privacy Law. ▫ Provide resources to support the Quebec Privacy Officer including training materials, communications, and tools to perform *Privacy Impact Assessments* as described in **section 8** and/or respond to individual requests exercising their rights under the Data Privacy Law as described in **section 7**.
Legal	▫ Ensure agreements with third-party business partners include appropriate data privacy/protection contract clauses.
IT	▫ Ensure the security and integrity of ANDRITZ systems, services, and equipment. ▫ Monitor employee compliance with IT policies and procedures. ▫ Perform regular evaluations and tests of the effectiveness of the implemented measures to ensure the security of the processing of personal information. ▫ Support the Quebec Privacy Officer in responding to individual requests exercising their rights under the Data Privacy Law as described in **section 7**.

3 PERSONAL INFORMATION COLLECTED BY ANDRITZ

Personal Information is defined as any information which relates to a natural person that allows that person to be identified. Generally, ANDRITZ does not collect any personal information unless voluntarily provided by the individual. However, in limited circumstances and with the consent of the individual, personal information is collected from third parties.

ANDRITZ collects personal information from the following categories of individuals:

- *Employees or Candidates for Employment*. Personal information from employees and candidates for employment is collected to enable ANDRITZ to recruit, employ, pay, provide benefits, and train individuals in the course of their employment with ANDRITZ. Depending on their role and the circumstances, personal information may also be collected from employees for the performance of their work obligations. Personal information collected from this category of individuals includes first and last name, address, personal email address and phone number, gender, race, age, nationality, birth country/location, emergency contact, qualifications, dependents, employment status and history, hire/termination date, salary and compensation information, training data, disciplinary information, professional accomplishments, information relative to their role within the company, and similar employment-related information.

- *Visitors to the ANDRITZ Website*. Individuals may visit ANDRITZ websites to review products, services, companies, and worldwide business activities without providing personal information. However, personal information may be collected to fulfill certain requests initiated by the individual including (1) requests for information about certain products or services, and (2) subscriptions to newsletters, customer magazines, communications/events (*e.g.*, white papers, webinars, consultation, and other events). Personal information from this category of individuals includes first and last name and email address.
- *Business Partners*. ANDRITZ collects personal information from its business partners to complete commercial transactions. Personal information from this category will include business-related contact information (*e.g.*, name, email, phone number, address, job title).

In addition, ANDRITZ employs video surveillance to ensure the safety and security of employees, visitors, and business partners and to protect the property and premises. Data collected from video surveillance is stored for no longer than 72 hours unless a longer storage duration is necessary to protect ANDRITZ's legitimate interests.

Lastly, ANDRITZ may collect certain information to enhance the functionality of the ANDRITZ websites including Internet browser type, operating system, and IP address. All such information is subject to the ANDRITZ cookies policy.

4 GATHERING OF INFORMATION

ANDRITZ collects personal information using the following methods:

- when voluntarily provided by the individual to ANDRITZ on the website or offline as part of the recruitment and employment processes or as part of their role.
- when voluntarily provided by the individual to ANDRITZ on the website or offline including subscribing to receive newsletters, customer magazines, or other communications (*e.g.*, emails, white papers, webinars, consultation, and information about other events).
- when provided by ANDRITZ business partners to complete commercial transactions.
- when recorded by video surveillance equipment installed at ANDRITZ offices and facilities to ensure the safety and security of employees, visitors, and business partners and to protect the property and premises.
- when accessing and browsing the ANDRITZ website.

5 INFORMATION LOCALIZATION

Personal information is stored and processed in facilities located in Quebec, or at Andritz AG headquarters and is accessible only by personnel in relevant functions including Human Resources, Information Technology, and Finance. ANDRITZ does not disclose personal information to third parties except as provided in **section 6** below.

6 DISCLOSURE OF PERSONAL INFORMATION

ANDRITZ does not share, sell, or otherwise disclose personal information to third parties except as provided below.

ANDRITZ shares personal information with the following third parties:

- *Affiliated or related entities*. ANDRITZ may disclose personal information to related or affiliated entities where it is necessary for internal reporting, for purposes of the employment relationship, and for corporate management reasons.
- *Service providers*. ANDRITZ uses certain third parties to support its business activities. These third-party service providers included website hosting providers, IT providers, software providers, recruitment providers, payroll and benefits administrators, travel agencies, legal counsel, consultants, and accountants. ANDRITZ third-party service providers are subject to security and confidentiality obligations and are only permitted to process personal information for specified purposes and per ANDRITZ's direction.
- *Customers.* ANDRITZ may disclose employee personal information to customers when necessary to ensure such employees can perform their work-related functions.

In addition, ANDRITZ may disclose personal information in the following circumstances:

- If ANDRITZ sells or buys any business or assets, it may disclose personal information to the prospective seller or buyer of such business or assets, including to permit the due diligence required to decide whether to proceed with a transaction,[2]
- If ANDRITZ is under a duty to disclose or share personal information to comply with any legal or regulatory obligation,
- If necessary to protect the vital interests of a person,
- To enforce or apply terms and conditions or to establish, exercise, or defend the rights of ANDRITZ, its employees, customers, or others, and
- With the individual's consent.

7 INDIVIDUAL RIGHTS

Individuals have the following rights related to their personal information:

- **Right to access**. An individual has the right to access the personal information ANDRITZ holds about them. To the extent possible, the information will be provided in a portable and commonly used format so that it can be transferred to another entity.

[2] Before disclosing any personal information as part of this type of transaction, ANDRITZ must first perform a Privacy Impact Assessment in accordance with **section 8**.

- **Right to rectification**. An individual has the right to verify the accuracy of their personal information and ask for it to be updated or corrected.
- **Right to request deletion**. In certain circumstances, an individual has the right to request the erasure of their personal information. Upon receipt of the request (and verifying its validity), ANDRITZ will delete the personal information from its records, and direct any third-party service provider to delete the information from their systems in accordance with the Data Privacy Law.
- **Right to withdraw consent at any time**. An individual has the right to withdraw consent where they have previously given their consent to the processing of personal information.

Please note the above rights are not absolute, and ANDRITZ may be entitled by law to refuse or limit a given request.

An individual may exercise any of the rights described in **section 7** and outlined in the Data Privacy Law by submitting a written request to the Quebec Data Privacy Officer (contact information provided in **section 1**) or by email to legalservices_canada@andritz.com. Any ANDRITZ employee who receives a request from an individual exercising their rights as described in **section 7** should forward the request to the Quebec Privacy Officer without delay. The Quebec Privacy Officer must respond to the request within **30 days** of the date of receipt.

8 PRIVACY IMPACT ASSESSMENTS

A Privacy Impact Assessment ("PIA") is a proactive analysis that evaluates the potential data privacy risks of a new project, system, or business activity. These assessments are designed to identify data privacy risks and develop strategies to effectively manage these risks before the business activity begins. A PIA must be performed for any project or business activity involving:

- An information system or electronic delivery system that collects, uses, stores, destroys, or otherwise processes personal information. This includes projects and activities related to a *new system* (*e.g.*, acquiring a new system, transferring data from an existing system to a new system, etc.) or an *existing system* (*e.g.*, expanding capacity, adding new features, system upgrades).
- A transfer or communication of personal information outside of Quebec.

Any project or business activity that meets either of the above requirements must undergo a PIA before it begins. To complete this assessment, the following process should be followed:

- The ANDRITZ project manager or lead employee working on the project that triggers the PIA requirement must contact the Quebec Data Privacy Officer and provide a detailed summary of the proposed project or business activity. In particular, the summary should specify (1) the type of personal information involved, (2) how the personal information will be used, (3) the purpose for which the information is used, (4) the quantity of personal information potentially involved, (5) the medium on which it will be stored, and (6) the protection measures that will apply.

- Upon receipt of the summary, the Quebec Data Privacy Officer will collaborate with the project manager/lead employee to obtain any additional information needed to perform the PIA.
- The Quebec Privacy Officer will review all information and assess the project or business activity to determine whether the data privacy risk is properly managed and mitigated. In addition, for projects or business activities involving transfers of personal information outside of Quebec, the Quebec Privacy Officer must also determine whether the personal information will be adequately protected in the location (*e.g.*, state or country) where the information will be transferred.
- If the Quebec Privacy Officer identifies any gaps or determines that the data privacy risk is not adequately mitigated, the Quebec Privacy Officer will recommend additional protection measures. These recommendations must be implemented before starting the project or business activity.

All questions regarding the PIA process and/or whether a particular project or business activity triggers the PIA requirement should be directed to the Quebec Privacy Officer.

The results of the PIA process should be documented and retained by the Quebec Privacy Officer.

9 RESPONDING TO CONFIDENTIALITY INCIDENTS

A *Confidentiality Incident* is any unauthorized access, use, disclosure, loss of, or any other breach in the protection of personal information in ANDRITZ's custody. All employees must immediately report any actual, suspected, or potential *Confidentiality Incidents* to the Quebec Privacy Officer. The Quebec Privacy Officer will collaborate with the IT and other functions as necessary to assess, contain, and remediate the incident. In addition, the Quebec Privacy Officer must notify the *Commission d'accès à l'information du Québec* and impacted individuals as required by the Data Privacy Law.

All *Confidentiality Incidents* must be documented in an incident Register. The Register will be regularly reviewed and updated, as appropriate, by the Quebec Privacy Officer.

10 RETENTION OF PERSONAL INFORMATION

ANDRITZ only processes personal information for as long as is reasonably necessary to achieve the purpose for which the information was collected. All personal information maintained beyond that time is destroyed in accordance with ANDRITZ's data retention practices except as required by applicable law or to comply with the company's legal obligations, resolve disputes, and enforce agreements. Unless provided otherwise, more specifically, personal information from employees or candidates for employment is retained for a period not exceeding seven years following the end of employment or the decision to decline to extend/accept an offer of employment. Personal information from ANDRITZ business partners is retained for a period of not exceeding seven (7) years following the termination of the business relationship.

11 SECURITY MEASURES

In accordance with the Data Privacy Law, ANDRITZ has implemented appropriate physical, electronic, and administrative safeguards to protect personal information from loss, misuse, unauthorized access, disclosure, alterations, destruction, or modification.

These measures are regularly reviewed, evaluated, and updated to proactively identify new or emerging security threats.

Where personal information is transferred to a third party, ANDRITZ takes the necessary steps to ensure that appropriate security measures are in place to prevent the unauthorized disclosure of personal information.

12 CHANGES TO THE ANDRITZ DATA PRIVACY POLICY

ANDRITZ may change the **ANDRITZ Data Privacy Policy** from time to time. Any changes will be posted on the relevant ANDRITZ intranet and internet pages and will show the date of the updated changes and revisions to the policy.