

Recruitment and Selection Data Protection Policy

Important Notice

The English version of this Policy is provided as a courtesy translation of the original Dutch version. In the event of any discrepancy, inconsistency, ambiguity or difference in interpretation between the English version and the Dutch version, the Dutch version shall prevail and remain the legally binding version.

The Dutch version of this Policy can be consulted here: [Werving en Selectie Data Protection Policy](#)

TREMEC, hereinafter referred to as the **Company**, thanks you for your interest in our Company and for your application.

The Company has prepared this Policy to inform you about how it collects, uses and otherwise processes your personal data in connection with your application and the recruitment and selection process. The Company understands your concerns regarding the processing of your personal data and therefore wishes to provide you with comprehensive information by clearly indicating the purposes for which your personal data are processed, the parties to whom such data may be disclosed, and the appropriate safeguards implemented in accordance with the General Data Protection Regulation ((EU) 2016/679) ("GDPR, Algemene Verordening Gegevensbescherming, AVG"), the applicable Data Protection Act ("Gegevensbeschermingswet") and any other applicable data protection legislation.

Any applicant who is at least fifteen (15) years of age acknowledges having read this Policy. The submission of a curriculum vitae ("CV") and continued participation in the selection procedure shall constitute acceptance of this Policy and of the processing of the applicant's personal data by the Company.

The applicant is required to cooperate in good faith with the selection procedure and to provide all information relating to his or her professional and educational background that is necessary for the assessment of the application, insofar as such information is relevant to the nature of the position and the conditions under which it is to be performed. The applicant shall furthermore refrain from disclosing any confidential information of which he or she may become aware in the course of the recruitment and selection process.

By applying with the Company, the applicant acknowledges that he or she has read this Policy and understands how the Company processes his or her personal data.

1. Categories of Individuals

This Policy applies to the following individuals, irrespective of their nationality or place of residence and/or stay:

- Any natural person who, in response to a job vacancy, submits an application for the position described in the relevant job advertisement.
- Any natural person who submits an unsolicited application for the purpose of having his or her curriculum vitae ("CV") included in a recruitment and selection database.
- Any natural person whose CV has been submitted to the Company by a third party, including a recruitment agency, temporary employment agency, contracting agency or through a personal referral. The Company shall provide the applicant with this Policy upon its first contact with the applicant.

2. Categories of Personal Data

In the context of your application, and more specifically for the purposes of the recruitment and selection process, the Company may process, among others, the following categories of personal data:

- Identification data, such as your first name, surname, marital status, address, date of birth, age, gender and visa status;
- Information relating to education and training, including educational background, training courses, diplomas and certificates;
- Employment-related information, including your current position and responsibilities, previous positions and professional experience, employment start and end date, reason for leaving, skills and professional competencies;
- Terms and conditions of employment, salary proposals and any feedback provided by the applicant regarding a salary proposal made by the Company;
- A health assessment form for a safety-critical position, a position involving increased vigilance, or an activity involving a specific risk (Article I.4-46 of the Belgian Codex on Well-being at Work). This form does not contain any health data;
- Information relating to physical suitability: where applicable, and exclusively for positions for which specific physical requirements are necessary (e.g. lifting heavy objects), information may be processed in relation to the candidate's physical suitability. Such processing shall be limited to what is strictly necessary for assessing the candidate's suitability for the position and shall not include medical or health-related data;
- Information relating to mobility, such as a driving license and available means of transportation;
- Information relating to leisure activities and interests, insofar as such information is voluntarily provided by the candidate and is relevant to the position concerned;
- Information relating to memberships of organizations or associations, excluding any membership of a trade union;
- Information resulting from knowledge and competency assessments. Such information shall only be collected where, following an initial review, your CV is considered suitable for the position;
- Information obtained through personality assessments. Such information shall only be processed where your CV has been shortlisted for the profile sought by the Company;
- Our website uses cookies that may process certain personal data, including your IP address, browsing behavior and navigation on the website. For more information regarding the processing of your personal data through cookies, please consult our Privacy and Cookie Policy available at: <https://tremec.com/privacy-policy/>.

The Company endeavors to obtain all information relevant to the recruitment process directly from the applicant. If the Company deems it necessary, it shall, solely with your prior consent, contact one or more of your former employers in order to obtain information concerning you and your professional experience.

Prior to the execution of an employment agreement, the Company shall not request certified true copies of diplomas, certificates or attestations from the applicant. Where an applicant has attached supporting documents to his or her application, such as transcripts, copies of diplomas, certificates, photographs or similar documents, the Company shall retain such documents for a reasonable period of time in the event that the applicant is not selected. If there is any doubt regarding the authenticity of a document that has been submitted or provided, the Company may request that the applicant present the original document for verification purposes.

The Company shall request information relating to an applicant's private life only where such information is relevant to the nature of the position and the conditions under which it is to be performed.

In certain circumstances, the Company may process special categories of personal data; however, such processing shall at all times be limited to the minimum extent necessary. In any event, the Company shall not process so-called "special categories of personal data", including but not limited to data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, health data, or data concerning a person's sexual orientation, during the recruitment process, unless required by applicable law.

Nor shall the Company process extracts from the Central Criminal Record (formerly referred to as a certificate of good conduct and morals), except where such processing is legally required for specific positions. The Company may, however, request that you present an extract from the Central Criminal Record solely for inspection purposes, after which the document shall be returned to you without being processed, retained or copied by the Company.

3. Purposes and Legal Bases for Processing

The Company shall collect and process your personal data solely to the extent necessary for the purposes of recruitment and selection. The personal data processed shall be proportionate to the position to be filled and limited to the information required to assess the extent to which your motivation, knowledge, skills, competencies and experience correspond to the profile of the vacant position for which you have applied or may otherwise be considered.

The Company processes the above-mentioned personal data on the basis of the various legal grounds set out in Article 6(1)(a), (b), (c) and (f), and Article 9(2)(b) of the GDPR ("AVG"), including:

- You have provided your explicit consent for such processing
 - Example: forwarding of your CV (see article 4 of this policy)
 - Example: inclusion of your profile in a talent pool, as further described below
 - Example: reference check
- The processing is necessary in order to take steps, at your request, prior to entering into an employment agreement with the Company, including facilitating and managing your potential onboarding process
 - Example: preparation and drafting of an employment agreement
- The processing is necessary for compliance with a legal obligation to which the Company is subject
 - Example: issuing a certificate of attendance for VDAB, Actiris or Forem at the applicant's request
 - Example: processing information contained in a health assessment form for a safety-critical position, a position involving increased vigilance, or an activity involving a specific risk, as referred to in Article I.4-46 of the Belgian Codex on Well-being at Work
- The processing is necessary for the purposes of the legitimate interests pursued by the Company in ensuring a proper assessment of your application, provided that such interests are not overridden by your interests or your fundamental rights and freedoms
 - Example: sharing your contact details with assessment centers or service providers responsible for administering tests or assessments, processing the results of tests or assessments carried out as part of the recruitment procedure, sharing your personal data with other departments of the Company or affiliated entities that may have an interest in your profile and qualifications

4. Processing of Your Personal Data

a) General

The recruitment procedure and the related processing of personal data shall commence when:

- you apply for a specific position;
- you submit an unsolicited application; or
- you are referred or recommended by a third party (e.g. a recruitment agency).

The Company uses various channels to identify suitable candidates for vacant positions. These may include the Company's own website, as well as third-party channels such as social media platforms (e.g. LinkedIn and Facebook), job portals, recruitment agencies and selection agencies. For specific positions or profiles, the Company may engage a specialized recruitment firm to assist in identifying suitable candidates.

Where the processing of your CV is carried out by such third parties, it is recommended that you review their terms and conditions and privacy policies in order to understand how they process your personal data. The Company cannot be held liable for the manner in which such third parties process your personal data, nor for the content published on their websites.

The Company requests that you verify the accuracy and completeness of the information you provide and that you inform us of any changes thereto or if, during the selection procedure, you are no longer interested in employment opportunities with the Company.

b) Specific Processing Activities During the Selection Procedure

During the initial stage of the selection procedure, the Company will assess your CV in order to determine whether it meets the requirements of the position.

Applicants who do not meet the requirements of the position and whose CVs will not be taken into further consideration shall be informed thereof in writing. The personal data and CVs of applicants who are not selected shall not be retained in our database. Where a particular profile is considered of potential interest for future opportunities, the Company may request your consent to retain your data in a talent pool, whereby you remain free to accept or decline such request.

Where your profile corresponds to the requirements of the position, the Company may conduct an initial telephone screening in order to further discuss your interest, experience and availability. Depending on the position and the manner in which the application was submitted, the Company may also proceed directly to an initial selection interview.

For direct applications, an interview with the Human Resources Department shall take place first, either online or on-site. During this interview, matters including your professional experience, motivation, competencies and the mutual expectations of both parties shall be discussed. If the outcome of this interview is positive, a technical interview shall subsequently be scheduled with the Hiring Manager and/or Team Leader in order to further assess your technical knowledge, experience and suitability for the position.

For candidates introduced through a contracting agency, interim agency or recruitment agency, the selection procedure follows a different sequence. In such cases, a technical interview with the Hiring Manager and/or Team Leader shall take place first. If the outcome of this interview is positive, an interview with Human Resources shall follow in order to assess the candidate's professional and personal fit within the organization, the corporate culture and the team.

In the final stage of the selection procedure, depending on the position and the candidate's profile, one or more assessments and/or tests may be administered, as the Company places importance on maintaining an objective recruitment and selection process.

These assessments and/or tests shall not exceed the duration that is reasonably necessary to assess the applicant's abilities and may include:

- a practical case study;
- a personality assessment;
- an aptitude test; and/or
- an intelligence test.

Such tests shall always serve as an objective guideline within the selection procedure and shall be combined with a professional evaluation and a comprehensive analysis conducted by a person specifically trained for this purpose. The Company may engage an external assessment provider to administer these tests.

The Company or the assessment provider shall explain the results of such tests and/or assessments, either orally or in writing, and the applicant shall at all times be given the opportunity to provide comments and share his or her experience.

Applicants who meet the requirements of the position but whose test results are deemed insufficient shall be informed thereof within a reasonable period of time. The personal data of applicants who are no longer under consideration shall not be retained for longer than necessary. Where a particular profile remains of potential interest for future opportunities, the Company may request the applicant's consent to retain his or her data in a talent pool, and the applicant remains free to accept or decline the request.

5. Recipients of Your Personal Data

The Company may be required to process your personal data internally and disclose it externally, in connection with the recruitment and selection process.

Access to your personal data shall be restricted to those persons whose function requires the processing of such information and, as a general principle, shall only be disclosed on a strict need-to-know basis to recipients involved in carrying out the various processing activities for the purposes described above.

a) Internal Recipients

The Human Resources Department shall process your personal data in the context of the recruitment and selection procedure and shall therefore have access to the categories of personal data listed under Article 2 of this Policy.

For the purposes of the selection procedure, the supervisor of the relevant sub-department, as well as the Chief Engineer and the Department Manager of the department in which the vacancy exists, may also have access to your personal data. Such access shall be limited to what is necessary for the assessment of your suitability for employment within the Company and within the relevant department or sub-department, including, but not limited to, information relating to the (current) position(s), professional experience, educational background, training and qualifications.

b) External Recipients

The Company may be required to disclose your personal data to various external service providers involved in the recruitment and selection process, including agencies specialized in recruitment and selection that present candidates, conduct initial interviews and administer personality and competency assessments.

These organizations are directly subject to the obligations imposed by the General Data Protection Regulation ("GDPR, AVG"). Consequently, your personal data shall be protected by such organizations in accordance with the requirements and safeguards prescribed by the GDPR ("AVG").

In certain circumstances, the Company may also be legally required to disclose your personal data to public authorities or governmental bodies. In such cases, the Company shall ensure that all applicable legal requirements and conditions for such disclosure have been satisfied.

c) Transfers to Third Countries

The Company may also transfer your personal data to entities within the same corporate group that are established in third countries, meaning countries located outside the European Economic Area ("EEA"), including:

- Mexico

Such transfers may take place where the country in which the recipient is established provides an adequate level of protection for personal data and has been recognized as such by the European Commission through an adequacy decision.

In other cases, including Mexico, the Company has entered into a model contractual arrangement with the recipient entity (TREMEC Mexico) in order to ensure that a level of protection substantially equivalent to that provided within the European Union is maintained.

Where neither an adequacy decision nor appropriate safeguards are available or feasible, your personal data may still be transferred, subject to your prior consent and within the limits of the relationship you maintain with the Company. In such circumstances, and where applicable, the Company shall request your explicit consent to the occasional transfer of your personal data to third countries in order to enable such transfer and the related processing activities.

Should you wish to receive further information regarding, or obtain a copy of, the safeguards implemented in connection with such international transfers of your personal data, you may do so by following the procedure described under Article 7 ("Your Rights") of this Policy.

6. Retention period

The Company shall process your personal data only for as long as necessary to achieve the purposes for which such data were collected. Different retention periods apply depending on the context of the recruitment and selection procedure.

a) Application for a Specific Vacancy

The Company's Human Resources Department shall retain your personal data processed during the recruitment and selection procedure for the period necessary to process and evaluate your application.

The Company shall retain your personal data for a maximum period of four (4) weeks following the filling of the vacancy. This retention period enables the Company to contact you should the selected candidate ultimately not be appointed or should the employment relationship be terminated or discontinued at an early stage.

b) Talent Pool

Where the Company has selected another candidate for a particular position but considers your profile to be of potential interest for a similar position or for another position within the Company, it may wish to contact you in the future regarding vacancies that may be of interest to you.

In such cases, the Company shall request your consent to retain your profile for a period of one (1) year. You may decline such request at any time, in which case the Company shall delete your personal data.

c) Unsolicited Applications

Any CV submitted through an unsolicited application shall be retained for a period of one (1) year.

d) Employment

In the event that you are hired by the Company, the processing of your personal data shall be necessary for the purposes of personnel administration and payroll administration. Such processing shall be necessary for the performance of the employment agreement, compliance with the Company's legal obligations and, where applicable, the pursuit of the Company's legitimate interests.

No later than the commencement of your employment, you shall receive further information regarding the processing of your personal data by the Company in the context of personnel administration and payroll administration.

e) Storage Location and Requests for Deletion

Your personal data shall be stored on the servers of TREMEC.

If you wish to have your CV removed before the applicable retention period expires, you may submit a request for deletion by following the procedure described in Article 7 ("Your Rights") of this Policy.

7. Your Rights

Through this Policy, the Company seeks to provide as much information as possible in order to ensure maximum transparency regarding the processing of your personal data in the context of a recruitment and selection procedure. Nevertheless, we understand that you may still have questions or require additional clarification.

To the extent applicable, you may also request the transfer of your personal data to another data controller. The exercise of these rights shall be subject to and carried out in accordance with the provisions of the GDPR ("AVG").

To the extent that the processing of your personal data is based on your consent, you shall have the right to withdraw such consent at any time. Any withdrawal of consent shall only affect future processing activities.

The Company does not engage in automated individual decision making that gives rise to legal effects.

You may exercise your rights and, insofar as the conditions set out in the applicable legislation, including the GDPR ("AVG"), are met, the Company shall comply with such requests by contacting the Human Resources Department via hr.be@tremec.com.

If you believe that your rights have been infringed, you also have the right to lodge a complaint with the competent Data Protection Authority ("Gegevensbeschermingsautoriteit").

8. Safeguards

The Company attaches great importance to the protection of your personal data and, accordingly, has implemented appropriate technical and organizational measures to safeguard your personal data and, in particular, to protect such data against loss, alteration or unauthorized access.

The Company therefore restricts access to your personal data to those departments and/or individuals for whom such access is necessary in order to fulfil the purposes described above, including the Human Resources Department and the managers responsible for the relevant position. The Company also ensures that only the personal data necessary to achieve the specific processing purposes are disclosed. These access restrictions serve to reduce the risk of loss, misuse or unauthorized access to personal data.

Individuals who have access to personal data have received, or will receive, appropriate training regarding the processing of personal data and the proper handling of your personal data. Furthermore, such individuals are bound by confidentiality obligations and confidentiality agreements designed to ensure the integrity, security and confidentiality of your personal data.

September 2026