

**LYONDELLBASELL**  
**JOB APPLICANT FAIR PROCESSING NOTICE**  
**("NOTICE")**

**1. What is this document and why should you read it?**

This Notice explains how and why LyondellBasell entities (also referred to as "**LyondellBasell**", "**we**", "**our**" and "**us**") use personal data about individuals that apply to become employees, staff, contractors, trainees, officers, consultants, and temporary or agency workers of LyondellBasell (referred to as "**you**"). The **LyondellBasell Group** means LyondellBasell Industries N.V. and its subsidiaries and affiliates over which it has operational control and that are employing entities.

You should read this Notice, so that you know what we are doing with your personal data (known in some jurisdictions like California as "personal information"). Please also read any other privacy notices that we give you, that might apply to our use of your personal data in specific circumstances in the future.

This Notice does not form part of any contract with you (including any contract of employment that may be offered) or any other contract to provide services.

**2. Our data protection responsibilities**

"**Personal data**" is any information that relates to an identifiable natural person. Your name, address, contact details and CV are all examples of your personal data, if they identify you.

In the context of this Notice and as defined in the Policy, the term "**process**" means any activity relating to personal data, including, by way of example, collection, storage, use, consultation, disclosure, sharing and transmission for purposes contemplated thereunder; as the case may be.

LyondellBasell is a so-called "**controller**" of your personal data. This means that we make decisions about how and why we process your personal data and, because of this, we are responsible for making sure it is used in accordance with data protection laws.

**3. What types of personal data do we collect and where do we get it from?**

We will typically collect your personal data from you, either directly, or through your interaction with our information technology resources and create some personal data about you ourselves (for example, our notes of your performance throughout the application process will contain personal data about you). We may also collect personal data about you from some public sources, such as publicly available directories and online resources, and from other third-parties (that is, individuals and organizations that are not part of the LyondellBasell Group). These third-parties will include government agencies, third-parties to whom we provide services which involve you, and third-parties who provide services to you or to us in connection with your employment, for example, recruitment consultants/agencies, your previous employer or referees. We cannot administer your application without your personal data. Where we don't need your personal data, we will make this clear, for instance we will explain if any part of an application form

you are required to complete is optional and can be left blank. The personal data about you that we collect includes the following categories of data:

- **Personal and Family Information:** identifiers (or information that identifies, relates to, describes, or is capable of being associated with, a particular individual) such as name(s) (and any former name(s)), address(es), telephone number(s), e-mail address, date and place of birth, nationality, gender, governmental social security or insurance number, passport number, photograph, lifestyle and social circumstances, family status (e.g. marital status, dependents), details of family members (name, date of birth, relationship to employee, nationality and marital status) and emergency contact (name, address and telephone number).
- **Recruitment/Employment Administration Information:** identifiers (or information that identifies, relates to, describes, or is capable of being associated with, a particular individual) such as job application (e.g., CV, education history and certificates, notes of candidate interviews, decisions to offer employment, background information, content of references; third-party references); ID card, passport, right to work, residency, visa and other immigration-related details; offered terms and conditions of employment (start date of employment); job descriptions of role applied for (business unit, grade, function, job family, code and type, status (full-time or part-time)); U.S. veteran status (a protected class under California or US federal law); preferences relating to work location (area, department, cost center) and contact details; employment and career history (job titles, transfers, promotions, managers or supervisors, reporting structure); images/photographs (including image data captured or recorded by CCTV); psychometric test results (depending on the job role); conflicts of interest (and family member information relating to that); professional memberships; preferences relating to salary, bonus, health insurance, pension arrangements, benefits previously provided to you (gym membership, private healthcare, life assurance etc.); your working preferences and feedback in relation to us and our staff; bank account details, including payroll information, tax codes, expense information; and IT-related information, such as usernames, passwords, access codes for company computer networks or systems, and use of communications and IT systems, as well as access logs and usage records and IP addresses/device identifiers.
- **Other Information:** other information collected for reasons related to your employment.
- **Sensitive Information:** some of the processing we undertake will include the processing of, what is in some countries referred to as, your 'special category personal data', or which may be protected under California or US federal law, such as medical information (including occupational health requirements, accident reports, day-to-day health concerns such as diabetes or epilepsy conditions which we should be aware of, dietary requirements, allergies, drug and alcohol test results and reasons for any short term or long term absence) and information which may reveal your race or ethnicity, your sexual orientation or gender identity, your religious or philosophical beliefs, your trade union membership, and information relating to actual or suspected criminal convictions and offences (together, "**Sensitive Information**"). (In the People's Republic of China, Sensitive Information also includes private telephone numbers, financial information, email addresses and identity information.) We will process Sensitive Information only when necessary and permitted to do so by law, on the basis outlined in this Notice.

**Please note:** if you use the LyondellBasell website at [www.lyondellbasell.com](http://www.lyondellbasell.com) to engage with LyondellBasell or apply for a vacancy, our processing of your personal data will be also conducted in accordance with our Website Privacy Policy – a copy of which can be found here: <https://www.lyondellbasell.com/en/about-us/privacy/>. There may be some overlap with the processing conducted in accordance with this notice and the Website Privacy Policy. Therefore, we would encourage you to review both.

Due to the type of work conducted by LyondellBasell, we also may perform further screening, including background checks on those applicants to whom we extend employment offers to the extent permitted by applicable law. Depending on the job role, these checks can relate to issuance of certificates of conduct, any criminal convictions (if it is permitted by applicable law) that you may have and your credit reference history. These checks include those checks that are required by applicable law and those required for our own policy compliance. Please see also the section below in relation to ‘Sensitive Information’.

If any of the personal information you have given to us changes, such as your contact details, please inform us without delay by contacting [personaldataprivacy@lyondellbasell.com](mailto:personaldataprivacy@lyondellbasell.com).

#### 4. **What do we do with your personal data and why?**

We process your personal data for particular purposes in connection with your application or engagement with us, and the management and administration of LyondellBasell.

We are required by law to always have a so-called “lawful basis” (i.e. a reason or justification) for processing your personal data. There are **six** such permitted lawful basis for processing personal data. The table at **Schedule 1** sets out the purposes for which we process your personal data and the lawful basis on which we rely for that processing. You should be aware that our lawful basis for processing your personal data may be impacted on the legal requirements in the country you work in. As such, outside of the EU, we may rely primarily on consent to process your personal data, whereas within the EU we will seldom rely on consent as the lawful basis for processing your personal data.

Please note that where we have indicated in the table at **Schedule 1** that our processing of your personal data is either:

- (a) necessary for us to comply with a legal obligation; or
- (b) necessary for us to take steps, at your request, to potentially enter into an employment contract with you, or to perform it,

if you choose not to provide the relevant personal data to us, we may not be able to enter into or continue our contract of employment or engagement with you.

Please note that we do not use your personal data to make any decisions about you which are solely based on automated decision making.

We may also convert your personal data into statistical or aggregated form to better protect your privacy, or so that you are not identified or identifiable from it. Anonymized data cannot be linked back to you. We may use it to conduct research and analysis,

including to produce statistical research and reports. For example, to help us understand how many applications we may receive in relation to certain types of roles.

## 5. Sensitive Information

Some of the processing described above, and in the table at **Schedule 1**, will include the processing of Sensitive Information which we are required to process with more care, in accordance with applicable data protection laws.

We will collect and further process Sensitive Information about you only when such processing:

- is with your explicit written consent;
- is necessary for the purposes of carrying out your or our obligations, or exercising your or our specific rights, in the field of employment and social security and social protection law, in so far as this is permitted by law (including under a collective agreement);
- is necessary for reasons of substantial public interest (e.g. equality of opportunity or treatment);
- is necessary for the establishment, exercise or defense of legal claims;
- is necessary for the purposes of occupational medicine or assessment of your working capacity;
- is necessary for a reason for which such processing is permitted expressly by law.

As noted above, our lawful basis for processing your Sensitive Information may vary depending on what country you work in. Specifically, within the EU we will seldom rely on explicit consent to process your Sensitive Information, whereas outside the EU, such consent may be the primary lawful basis for our processing your Sensitive Information.

The table at **Schedule 2** sets out the different purposes for which we process your Sensitive Information and the relevant lawful basis on which we rely for that processing. For some processing activities, we consider that more than one lawful basis may be relevant – depending on the circumstances.

## 6. Who do we share your personal data with, and why?

Sometimes we need to disclose your personal data to other people.

### Within LyondellBasell:

As part of a global group of companies, we will need to share your personal data with other companies in the group for our general business and workforce management purposes and, in some cases, for line management, authorizations/approvals with relevant decision makers, reporting and where systems and services are provided on a shared basis.

Access rights between members of the LyondellBasell Group are limited and granted only on a need to know basis, depending on job functions and roles.

Where any LyondellBasell group companies process your personal data on our behalf (as our processor), this will be on the basis of appropriate data protection standards being in place to protect your personal data.

### Outside LyondellBasell:

From time to time we may ask third parties to carry out certain business functions for us. These third parties will process your personal data on our behalf (generally as our processor). (Consistent with our Policy, we will seek consent for the transfer or rely on another lawful basis if that is required under applicable law in respect of that transfer. Please see **Schedule 1** and **Schedule 2** for more detail). We will disclose your personal data to these parties so that they can perform those functions.

We do not sell personal data about you, as that term is defined by California privacy law, nor have we done so in the past 12 months.

Under California law, the categories of third parties we share your Personal and Family Information with, as well as Recruitment/Employment Administration Information and Sensitive Information, are our service providers.

In certain circumstances, we will also disclose the above categories of personal data to third parties who will receive it as controllers of your personal data in their own right for the purposes set out above, where the relevant disclosure is:

- (a) if we need to disclose your personal data in order to comply with a legal obligation, to enforce a contract or to protect the rights, property or safety of our employees or others; and
- (b) in connection with a sale, purchase or transfer of all or part of a business, we may disclose or transfer your personal data to the prospective seller, buyer or transferor and their advisors.

We have set out below a list of the categories of controllers with whom we are likely to share your personal data:

- (a) recruitment agencies appointed by you or us;
- (b) consultants and professional advisors including legal advisors and accountants;

- (c) courts, court-appointed persons/entities, receivers and liquidators;
- (d) trade associations and professional bodies;
- (e) insurers; and
- (f) governmental departments, statutory and regulatory bodies including the governmental employee insurance offices and tax and revenue authorities.

**7. Where in the world is your personal data transferred to?**

As part of a global organization, LyondellBasell may transfer your personal data to recipients (either internally or externally, as set out above) that are established in jurisdictions other than your own. Please be aware that the data protection laws in some jurisdictions may not provide the same level of protection to your personal data as is provided to it under the laws in your jurisdiction.

If any disclosures of personal data referred to above require your personal data to be transferred from within to outside the European Economic Area, we will only make that transfer if:

- (a) the country to which the personal data is to be transferred ensures an adequate level of protection for personal data;
- (b) we have put in place appropriate safeguards to protect your personal data, such as an appropriate contract with the recipient;
- (c) the transfer is necessary for one of the reasons specified in data protection legislation, such as the performance of a contract between us and you; or
- (d) you explicitly consent to the transfer.

For more information, please contact [personaldataprivacy@lyondellbasell.com](mailto:personaldataprivacy@lyondellbasell.com) if you wish to obtain a copy of any relevant safeguards we have put in place.

**8. How do we keep your personal data secure?**

We will take specific steps (as required by applicable data protection laws) to ensure we take appropriate security measures to protect your personal data from unlawful or unauthorized processing and accidental loss, destruction or damage. We will also require that third parties to whom we disclose your personal data also take appropriate security measures to protect your personal data.

**9. How do we communicate with you?**

We will use your personal data to contact you in relation to the progress of any applications that you make with us and to respond to any other questions, comments or complaints that you may raise.

From time to time, we will also send you information in relation to other roles and vacancies which may be of interest. Such communications will only be sent with your consent (where this is required by law) and you will be given the opportunity to opt-out of receiving such communications at any time.

**10. How long do we keep your personal data for?**

If you are successful in your application, we will keep your personal data in computer systems operated by or under the instruction of LyondellBasell Group companies and/or at our premises during the period of your employment and then, after your employment with us ends, for as long as is necessary in connection with both our and your legal rights and obligations.

Where you are unsuccessful in your application, we will only retain your personal data for a limited period of time.

In either case, how long we retain your data will depend on a number of factors, including:

- (a) any laws or regulations that we are required to follow;
- (b) whether we are in a legal or other type of dispute with each other or any third party;
- (c) the type of information that we hold about you;
- (d) whether we are asked by you or another regulatory authority to keep your personal data for a valid reason; and
- (e) the period of time during which any claims or proceedings can be brought against us or a member of the group to defend against any such claims.

For more information on our data retention practices, please contact [personaldataprivacy@lyondellbasell.com](mailto:personaldataprivacy@lyondellbasell.com).

**11. What are your rights in relation to your personal data and how can you exercise them?**

You have certain rights, which are briefly summarized at **Schedule 3**, in relation to any personal data about you which we hold. These rights may include the right to request us to disclose what personal data we collect, use, or disclose. Please note, you may not have access to all of these rights depending on the country you live and/or work in, and only those relevant in your jurisdiction will apply. For those working in the EU, all of the rights summarized in Schedule 3 will apply to you.

We will not discriminate against you for exercising any of these rights [under California law].

Where our processing of your personal data is based on your **consent** (please see **Schedules 1 and 2**), you have the right to withdraw your consent at any time. If you do decide to withdraw your consent we will stop processing your personal data for that purpose, unless there is another lawful basis we can rely on – in which case, we will let you know. Your withdrawal of your consent won't impact any of our processing up to that point.

Where our processing of your personal data is necessary for our **legitimate interests** (please see **Schedule 1**), you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim (or in some circumstances we may obtain a consent from you for such processing).

If you wish to exercise any of these rights please contact [personaldataprivacy@lyondellbasell.com](mailto:personaldataprivacy@lyondellbasell.com) in the first instance, or our webform.

Note that for certain rights, including the right of access and deletion, we need to verify your identity. We will do so by matching the data you provide for this purpose with data we already have on file. If you would like to appoint an authorized agent to make a request on your behalf, and that agent is not already authorized to access your account in your profile, we require you to verify your identity with us directly before we provide any requested information to your approved agent.

Please find the contact details for relevant European data protection authorities listed below. If you are based outside of the countries listed below (e.g. outside of Europe) there may be other applicable supervisory authorities/regulators in your country to which you have the right to complain.

If you are in the Netherlands, you have a right to complain to the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) which enforces data protection laws about the way in which your data is being processed by our Dutch LyondellBasell entities: <https://www.autoriteitpersoonsgegevens.nl/en/contact-dutch-dpa/contact-us>

If you are in the UK, you have the right to complain to the Information Commissioner's Office which enforces data protection laws about the way in which your data is being processed by our UK LyondellBasell entities: <https://ico.org.uk/> .

If you are in Germany, you have the right to complain to the relevant privacy regulator there about the way in which your data is being processed by our German LyondellBasell entities: Die Bundesbeauftragte für den Datenschutz und die Informationsfreiheit: <http://www.bfdi.bund.de/> Note that the competence for complaints is split among different data protection supervisory authorities in Germany. Competent authorities can be identified according to the list provided under: [https://www.bfdi.bund.de/bfdi\\_wiki/index.php/Aufsichtsbeh%C3%B6rden\\_und\\_Landesdatenschutzbeauftragte](https://www.bfdi.bund.de/bfdi_wiki/index.php/Aufsichtsbeh%C3%B6rden_und_Landesdatenschutzbeauftragte)

If you are in France, you have the right to complain to the Commission Nationale de l'Informatique et des Libertés – CNIL, which enforces data protection laws about the way in which your data is being processed by our French LyondellBasell entities: <https://www.cnil.fr/en/home>

If you are in Spain, you have the right to complain to the Agencia Española de Protección de Datos (AEPD), which enforces data protection laws about the way in which your data is being processed by our Spanish LyondellBasell entities: <https://www.aepd.es/>

If you are in Italy, you have the right to complain to the Garante per la protezione dei dati personali, which enforces data protection laws about the way in which your data is being processed by our Italian LyondellBasell entities: [https://www.garanteprivacy.it/en/home\\_en](https://www.garanteprivacy.it/en/home_en)



If you are in Portugal, you have the right to complain to the Comissão Nacional de Protecção de Dados – CNPD which enforces data protection laws about the way in which your data is being processed by our Portuguese LyondellBasell group companies: <http://www.cnpd.pt/>

**12. Updates to this notice**

We may update this notice from time to time to reflect changes to the type of personal data that we process and/or the way in which it is processed. We will update you on material changes to this notice as appropriate. We also encourage you to check this notice on a regular basis.

**13. Where can you find out more?**

If you want more information about any of the subjects covered in this privacy notice or if you would like to discuss any issues or concerns with us, you can contact [personaldataprivacy@lyondellbasell.com](mailto:personaldataprivacy@lyondellbasell.com).

## SCHEDULE 1

### PROCESSING ACTIVITIES AND LAWFUL BASIS

**\*\*\* Please note:** Where legally appropriate we will rely on consent as the primary lawful basis for processing your personal data, but may also rely on the other lawful basis listed below. Some country specific approaches to consent are listed below for reference:

- *In Russia*, we will rely on consent for the processing of any personal data for all purposes other than where we process personal data for the purpose of entering into an employment contract with you, or if we received your data from a recruitment agency, or if we obtained your CV data from a public source of CVs.
- We will rely primarily on consent to process your personal data in the following countries:
  - *Brazil*;
  - *Canada (Alberta, British Columbia and Québec)* - In Alberta and British Columbia, we may rely on your implied consent having provided you with this Notice. In Québec, we shall rely will rely on your express consent – **Please note:** Canadian privacy statutes governing the private sector allow for us to collect use and disclosure your personal information without consent if it is solely for the purposes reasonably required to establish, manage or terminate our employment relationship with you;
  - *Thailand*;
  - *The People's Republic of China*; and
  - *Vietnam*.

**\*\* In the EU** - Consent will only be relied on in the *very limited situations* set out below. For the most part, in the EU, we will rely on other lawful basis for processing your personal data, as set out in the table below, in particular, where the processing is necessary for: the performance of a contract; compliance with a legal obligation; and/or our legitimate interests (or those of a third party and where your rights and freedoms are not prejudiced), amongst the other lawful basis set out below.

For some processing activities, we consider that more than one lawful basis may be relevant – depending on the circumstances.

Purposes of processing	Lawful basis				
	We are permitted to process your personal data because...				
	You have given <b>your consent</b> to the processing	It is necessary to <b>perform a contract with you</b>	It is necessary for us to comply with a <b>legal obligation</b>	It is necessary for <b>our legitimate interests</b> or those of third parties	It is necessary to <b>protect your vital interests</b> (or those of someone else)
<b>a) Recruitment and workforce planning</b>					
1. Developing, operating and collecting feedback on recruitment activities and employee selection processes				✓	
2. Administering your application for a job with us and considering your suitability for the relevant role				✓	
3. Obtaining, considering and verifying your employment references and employment history				✓	
4. Reviewing and confirming your right to work			✓		
5. Conducting verification and vetting, including criminal background checks and credit checks where required by law <i>(Note: please also see Schedule 2)</i>			✓	✓	
6. Conducting background checks, verification and vetting which are not required by law but needed by us to assess your suitability for your role <i>(Note: please also see Schedule 2)</i>	✓			✓	
7. Making a job offer to you and entering into a contract of employment with you		✓		✓	
8. Identifying and assessing LyondellBasell's strategic business direction, resourcing needs and areas for development				✓	
9. Promotion and succession planning				✓	

Purposes of processing	Lawful basis				
	We are permitted to process your personal data because...				
	You have given <b>your consent</b> to the processing	It is necessary to <b>perform a contract with you</b>	It is necessary for us to comply with a <b>legal obligation</b>	It is necessary for <b>our legitimate interests</b> or those of third parties	It is necessary to <b>protect your vital interests</b> (or those of someone else)
10. Analyzing recruitment and retention objectives, processes and employee turnover rates				✓	
<b>General Applicant management and administration</b>					
11. Communicating with you and providing you with information in connection with your application or engagement with us from time to time	✓	✓		✓	
12. General staff administration, including workforce management and facilities operations				✓	
13. Managing our health and safety compliance obligations ( <b>Note: please also see Schedule 2</b> )			✓		
14. Determining whether any adjustments are necessary to enable you to carry out a role offered to you ( <b>Note: please also see Schedule 2</b> )		✓	✓		
15. Considering your suitability for existing and future vacancies				✓	
16. Handling grievances and complaints, including investigating issues, considering appropriate resolution and mitigating actions and reviewing outcomes				✓	
17. Responding to feedback requests from you or your recruiter	✓			✓	
<b>b) Security and governance</b>					
18. Monitoring the security of LyondellBasell's physical premises and systems, networks and applications			✓	✓	
19. Identifying and authenticating Applicants and other individuals ( <b>Note: please also see Schedule 2</b> )				✓	

Purposes of processing	Lawful basis				
	We are permitted to process your personal data because...				
	You have given <b>your consent</b> to the processing	It is necessary to <b>perform a contract with you</b>	It is necessary for us to comply with a <b>legal obligation</b>	It is necessary for <b>our legitimate interests</b> or those of third parties	It is necessary to <b>protect your vital interests</b> (or those of someone else)
20. Identifying, investigating and mitigating suspected misuse of LyondellBasell's assets, systems and platforms (Note: please also see Schedule 2)			✓	✓	
<b>c) Legal and regulatory compliance and responsibilities</b>					
21. Managing and administering our equal opportunities reporting (Note: please also see Schedule 2)			✓		
22. Establishing and potentially contacting an emergency contact for individuals in case of emergency (Note: please also see Schedule 2)				✓	✓
23. Responding to binding requests or search warrants or orders from courts, governmental, other regulatory and/or enforcement bodies and authorities (Note: please also see Schedule 2)			✓		
24. Responding to non-binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities (Note: please also see Schedule 2)	✓			✓	
25. Complying with disclosure orders arising in civil proceedings (Note: please also see Schedule 2)			✓		
26. Investigating, evaluating, demonstrating, monitoring, improving, reporting on and meeting LyondellBasell's compliance with relevant legal and regulatory requirements (Note: please also see Schedule 2)			✓		

Purposes of processing	Lawful basis				
	We are permitted to process your personal data because...				
	You have given <b>your consent</b> to the processing	It is necessary to <b>perform a contract with you</b>	It is necessary for us to comply with a <b>legal obligation</b>	It is necessary for <b>our legitimate interests</b> or those of third parties	It is necessary to <b>protect your vital interests</b> (or those of someone else)
27. Investigating, evaluating, demonstrating, monitoring, improving, reporting on and meeting LyondellBasell's compliance with best practice and good governance responsibilities (Note: please also see <b>Schedule 2</b> )				✓	
<b>d) Day-to-day business operations</b>					
28. Implementing, adapting and enhancing systems and processes to develop or improve our business and/or make the application process easier or more enjoyable				✓	
29. Managing, planning and delivering our global business strategies				✓	
30. Supporting and maintaining our technology infrastructure	✓			✓	
31. Supporting the sale, transfer or merging of part or all of our business or assets, or in connection with the acquisition of or by another business (Note: please also see <b>Schedule 2</b> )			✓	✓	

**SCHEDULE 2**

**SPECIAL CATEGORY PERSONAL DATA – PROCESSING ACTIVITIES AND LAWFUL BASIS**

**\*\* Please note:** Where legally appropriate we will rely on explicit consent as the primary lawful basis for processing your special category personal data, but may also rely on the other lawful basis listed below. Please see the introduction to **Schedule 1** for guidance on some country specific approaches to consent (which apply equally here to explicit consent).

In Russia we will rely on explicit consent as the lawful basis for the processing of images/photographs of you, as well for processing of your Sensitive Information.

**\*\*\* In the EU -** Explicit Consent will only be relied on in the *very limited situations* set out below. For the most part, in the EU, we will rely on other lawful basis for processing your special category personal data, as set out in the table below, in particular, where the processing is necessary for: our rights and obligations in the field of employment and social security; our establishment, exercise or defense of legal claims; and/or reasons of substantial public interest, amongst the other lawful basis set out below.

Purposes of processing	Special category - lawful basis					
	We are permitted to process your personal data because...					
	You have given <b>your explicit consent</b> to the processing	It is necessary for your/our obligations and rights in the field of <b>employment and social security</b> and social protection law	It is necessary to protect the <b>vital interests</b> of the data subject or another person you or they are physically or legally incapable of giving consent	It is necessary for our establishment, exercise or defense of <b>legal claims</b>	It is necessary for reasons of <b>substantial public interest</b>	It is necessary for <b>preventive or occupational medicine</b> , for the assessment of the working capacity of the employee
<b>a) Recruitment and workforce planning</b>						
1. Conducting verification and vetting, including criminal background checks and credit checks where required by law		✓			✓	
2. Conducting background checks, verification and vetting which are not required by law but needed by us to assess your suitability for your role	✓				✓	
<b>b) General application management and administration</b>						

**Special category - lawful basis**

We are permitted to process your personal data because...

Purposes of processing	Special category - lawful basis					
	You have given <b>your explicit consent</b> to the processing	It is necessary for your/our obligations and rights in the field of <b>employment and social security</b> and social protection law	It is necessary to protect the <b>vital interests</b> of the data subject or another person you or they are physically or legally incapable of giving consent	It is necessary for our establishment, exercise or defense of <b>legal claims</b>	It is necessary for reasons of <b>substantial public interest</b>	It is necessary for <b>preventive or occupational medicine</b> , for the assessment of the working capacity of the employee
3. Managing our health and safety compliance obligations		✓			✓	
4. Determining whether any adjustments are necessary to enable you to carry out a role		✓			✓	
<b>c) Security and governance</b>						
5. Identifying and authenticating applicants and other individuals	✓				✓	
6. Identifying, investigating and mitigating suspected misuse of LyondellBasell's assets, systems and platforms				✓		
7. Establishing and potentially contacting an emergency contact for individuals in case of emergency	✓	✓				
<b>d) Legal and regulatory compliance and responsibilities</b>						
8. Managing and administering our equal opportunities reporting					✓	
9. Responding to binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities or sharing information (on a voluntary basis) with the same				✓		
10. Responding to non-binding requests or search warrants or orders from courts, governmental, regulatory	✓					



**Special category - lawful basis**

We are permitted to process your personal data because...

Purposes of processing	You have given <b>your explicit consent</b> to the processing	It is necessary for your/our obligations and rights in the field of <b>employment and social security</b> and social protection law	It is necessary to protect the <b>vital interests</b> of the data subject or another person you or they are physically or legally incapable of giving consent	It is necessary for our establishment, exercise or defense of <b>legal claims</b>	It is necessary for reasons of <b>substantial public interest</b>	It is necessary for <b>preventive or occupational medicine</b> , for the assessment of the working capacity of the employee
and/or enforcement bodies and authorities						
11. Complying with disclosure orders arising in civil proceedings				✓		
12. Investigating, evaluating, demonstrating, monitoring, improving and reporting on LyondellBasell's compliance with relevant legal and regulatory requirements				✓		
13. Investigating, evaluating, demonstrating, monitoring, improving, reporting on and meeting LyondellBasell's compliance with best practice and good governance responsibilities	✓			✓		
<b>e) Day-to-day business operations</b>						
14. Supporting the sale, transfer or merging of part or all of our business or assets, or in connection with the acquisition of or by another business	✓					

### SCHEDULE 3

#### YOUR RIGHTS IN RELATION TO PERSONAL DATA

**\*\* Please note:** Depending on the country you work in and the applicable data protection laws in that country, you may only have access to some of the below listed rights.

Your right	What does it mean?	Limitations and conditions of your right
<b>Right of access</b>	Subject to certain conditions, you are entitled to have access to your personal data (this is more commonly known as submitting a “data subject access request”).	<p>If possible, you should specify the type of information you would like to see to ensure that our disclosure is meeting your expectations.</p> <p>We must be able to verify your identity.*</p> <p>We may refuse a data subject access request depending on the circumstances of the request. For example, access may not be provided (unless otherwise provided by applicable law) where,:</p> <ul style="list-style-type: none"><li>• the burden or expense of providing access would be disproportionate to the risks to you, the requester (<b>Please note: this particular exemption is not applicable in Brazil</b>);</li><li>• the rights or interests of an individual other than you would be violated, such as where access would reveal another individual's personal data;</li><li>• access would reveal information which we have taken steps to protect from disclosure because disclosure would help a competitor in the market (<b>Confidential Commercial Information</b>), such as where Confidential Commercial Information cannot be readily separated from the personal data;</li><li>• the execution or enforcement of the law, including prevention, investigation or detection of offences or the right to a fair trial would be interfered with;</li><li>• an investigation or grievance proceeding being conducted by us would be prejudiced;</li></ul>

**Right to data portability**

Subject to certain conditions, you are entitled to receive the personal data which you have provided to us and which is processed by us by automated means, in a structured, commonly-used machine readable format.

**Rights in relation to inaccurate personal or incomplete data**

You may challenge the accuracy or completeness of your personal data and have it corrected or completed, as applicable. You have a responsibility to help us to keep your personal information accurate and up to date.  
We encourage you to notify us of any changes regarding your personal data as soon as they occur,

- any confidentiality that may be necessary for limited periods in connection with our management of our workforce (e.g. succession planning and corporate re-organizations; or in connection with monitoring, inspections, or regulatory functions connected with sound economic or financial management);
- a court, or other authority of appropriate jurisdiction, determines that we are not required to provide access;
- a legal or other professional privilege or obligation would be breached; or
- there is no legal requirement for us to provide such access, including because local legal requirements for a valid data subject access request have not been met.

We may charge an administrative fee to you where the data subject access request is excessive or significantly unfounded (limited to the actual cost required to provide access to the requested personal data in the required format) unless otherwise provided by applicable law.

If you exercise this right, you should specify the type of information you would like to receive (and where we should send it) where possible to ensure that our disclosure is meeting your expectations. This right only applies if the processing is based on your consent or on our contract with you and when the processing is carried out by automated means (i.e. not for paper records). It covers only the personal data that has been provided to us by you.

Please always check first whether there are any available self-help tools to correct the personal data we process about you. This right only applies to your own personal data. When exercising this right, please be as specific as possible.

<p><b>Right to object to or restrict our data processing</b></p>	<p>including changes to your contact details, telephone number, immigration status.</p> <p>Subject to certain conditions, you have the right to object to or ask us to restrict the processing of your personal data.</p>	<p>This right applies where our processing of your personal data is necessary for our legitimate interests. You can also object to our processing of your personal data for direct marketing purposes or in other cases stipulated in the applicable law.</p>
	<p><b>Please note, in Vietnam this may include a right to stop us from providing your personal data to a stipulated third party.</b></p>	
<p><b>Right to erasure</b></p>	<p>Subject to certain conditions, you are entitled to have your personal data erased (also known as the “<i>right to be forgotten</i>”), e.g. where your personal data is no longer needed for the purposes it was collected for; where the relevant processing is unlawful, or there is an applicable law requiring erasure of the personal data; or where you have exercised a legitimate right to object to processing of your personal data.</p>	<p>We must be able to verify your identity.*</p> <p>We may not be in a position to erase your personal data, if for example:</p> <ul style="list-style-type: none"> <li>• we need it to comply with a legal obligation;</li> <li>• we need it to exercise or defend legal claims;</li> <li>• we need it to exercise freedom of expression and information;</li> <li>• we need it to carry out a task in the “public interest”;</li> <li>• we need it to archive personal data in the public interest, or for scientific, historical, or statistical research purposes if those purposes would be seriously impaired by the erasure of the personal data; or</li> </ul> <p>there is an absence of a right to request erasure under any law applicable to our processing of your personal data.</p>
<p><b>Right to withdrawal of consent</b></p>	<p>Where our processing of your personal data is based on your consent you have the right to withdraw your consent at any time.</p>	<p>If you withdraw your consent, this will only take effect for future processing.</p>