

[EU] PRIVACY POLICY

LG Energy Solution (hereinafter referred to as “The Company”, “we”, or “us” interchangeably) cares about your privacy. This privacy policy will explain how our organization uses the personal data we collect from you when you use our intranet systems. The protection of your privacy when processing personal data is important to us. We therefore process your personal data in compliance with the relevant data protection regulations, in particular the EU General Data Protection Regulation (GDPR). By using any of our services and systems, you consent to the terms of this privacy policy. The Company may amend this Privacy Policy as required by relevant laws or Company’s internal regulation.

Why do we process your data?

We only process your data based on consent according to Art.6(1) GDPR, which you are free to give or refuse. You can change your decisions at anytime by contacting us. If you change your decision it will not affect the lawfulness of processing based on consent before its withdrawal..

Intranet System Usage, CCTV Records, HR Management, Welfare benefits, Payroll, Emergency Operational Plan

What data do we collect?

The Company collects the following data:

- Personal information :
 - HR Information (photo, name, birth date, address, email, phone number, languages, nationality)
 - Family information (name, birth date)
 - Education information (graduation, certification)
 - Career information (Career certification)
 - Finance information (bank name, account number, name)
 - Payroll information (salary, bonus)
- Information about usage of intranet system :
 - ID/PW, access logs, IP, MAC, etc...

How will we use your data?

The Company collects your data so that we can:

- give the employees intranet system access
- manage the Human Resources and pay salary, bonus
- provide employees welfare benefits
- detect and monitor the company's information from malicious leakage

How long do we keep your data?

Personal data will be processed for at least the period of employment and for a longer of the following periods: data retention period specified in the laws or until the expiration of the claim limitation period - in accordance with the data retention policies applied by the Company. You may obtain the data retention policies by contacting the Company.

Who do we share with your data?

The Company outsources personal information processing for its smooth provision for services. The Company specifies in a contractual document the matters concerning the outsourcee's responsibilities such as prevention of processing personal information for any purpose other than conducting outsourced services, technical/managerial safeguards, restriction on suboutsourcing, management/supervision and compensation for damages, etc., and manages and supervise the outsourcee to confirm if information is processed safely.

Company	Company Address	Details of Outsourced Services
LG CNS Co., Ltd.	Magokjungang 8-ro, Gangseo-gu, Seoul, Republic of Korea	System development, management and maintenance

※If there are any changes in the above Outsourcees or Outsourced Services, we will ensure that such changes are disclosed through this Privacy Notice without any delay.

Where do we transfer your data?

Your use of any intranet systems will involve the transfer, storage, and processing of your personal information within and outside of your country of residence consistent with this policy. In particular, your personal information will be transferred to **the Republic of Korea (Head Office of LG Energy Solution)**, where has received an adequacy decision by the EU Commission. Please note that the data protection and other laws of countries to which your information may be transferred might not be as comprehensive as those in your country. Therefore, there may be risks due to differences in the level of personal information protection.

The personal data are transferred through VPN and Company adopts technical and organizational measures necessary to ensure transferred personal data not to be lost, stolen, disclosed, altered or destructed.

Company Name	Country	Purpose
LG CNS	Republic of Korea	IT Maintenance
Google Cloud Platform	Republic of Korea, Japan	Storing of Data and Cloud System Operation
SAP	Australia	Storing of Data and Cloud System Operation

How do we protect your data?

The Company shall take the following technical and organizational security measures to protect your data:

- Maintain Information security policies and make sure that policies and measures are regularly reviewed and where necessary, improve them.

- Communication with the Company applications utilizes cryptographic protocols such as TLS to protect information in transit over public networks. At the network edge, firewalls, web application firewalls, and DDoS protection are used to filter attacks.
- Data security controls which include logical segregation of data, restricted (e.g. role-based) access and monitoring, and where applicable, utilization of commercially available and industry-standard encryption technologies.
- Logical access controls designed to manage electronic access to data and system functionality based on authority levels and job functions.
- Physical and environmental security of data center, server room facilities and other areas containing client confidential information designed to: (i) protect information assets from unauthorized physical access, (ii) manage, monitor and log movement of persons in and out of the Company facilities, and (iii) guard against environmental hazards such as heat, fire and water damage.
- Operational procedures and controls to provide for configuration, monitoring, and maintenance of technology and information systems according to prescribed internal and adopted industry standards, including secure disposal of systems and media to render all information or data contained therein as undecipherable or unrecoverable prior to final disposal or release from the Company possession.
- Network security controls that provide for the use of enterprise firewalls and layered DMZ architectures, and intrusion detection systems and other traffic and event correlation procedures designed to protect systems from intrusion and limit the scope of any successful attack.
- Vulnerability assessment, patch management, and threat protection technologies and scheduled monitoring procedures designed to identify, assess, mitigate and protect against identified security threats, viruses and other malicious code.

What are your data protection rights?

We would like to make sure you are fully aware of all of your data protection rights.

Every user is entitled to the following:

The right to access (Art.15 GDPR) – You have the right to request us for copies of your personal information.

The right to rectification (Art.16 GDPR) – You have the right to request that we correct any information you believe is inaccurate. You also have the right to request us to complete information you believe is incomplete.

The right to erasure (Art.17 GDPR) – You have the right to request that we erase your personal information, under certain conditions.

The right to restriction of processing (Art.18 GDPR) – You have the right to request that we restrict the processing of your personal information, under certain conditions.

The right to data portability (Art.20 GDPR) – You have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.

The right to object (Art.21(1) GDPR) – In this case, the objection to data processing must be justified.

If the data processing is based on a consent, your consent can be revoked at any time with effect for the future. The revocation of the consent does not affect the lawfulness of the processing carried out on the basis of the consent up to the revocation.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email:

Write to us: privacy.es@lgensol.com

How do we use Cookies?

The Company uses 'cookies' to store and retrieve user information from time to time to provide personalized service. A cookie is a very small text file that the server uses to operate the website, which sends to the user's browser and is stored on the user's computer hard disk.

Purpose of Use of Cookies, etc.:

- Understanding how you use our website
- To improve services by identifying the frequency of access or length of stay of users.

How to Reject Cookie Settings:

- The User may accept all cookies, check each time a cookie is saved or reject saving any cookies by selecting an option on the web browser.
- Rejection method (in case of Internet Explorer browser): Tools at the top of the web browser > Internet Options > Privacy > Advanced > Cookie setting

How to contact us

The Company has designated a Department in charge of personal information protection as below, with overall responsibility for processing of personal information to handle complaints and damage relief sought by data subjects in relation to personal information processing, etc. Users may make any inquiries about personal information protection, complaint handling or damage relief, etc. that arise while using the Company's services (or business) through the person in charge and the relevant department, and the Company will respond to and address users' inquiries without delay.

Department in charge of personal information protection:

- Department : Security Policy Team
- Email : privacy.es@lgensol.com

Branch office in Germany and Data Protection Officer:

- LG Energy Solution Europe GmbH
- Company Address : Otto-Volger-Str.7C, 65843, Sulzbach (Taunus), Germany
- Contact Email of Data Protection Officer : data.protect@lgensol.com

Branch office in Poland and Data Protection Officer:

- LG Energy Solution Wroclaw Energy Sp. z o.o.
- Company Address : ul. LG 1A, Biskupice Podgorne, 55-040, Kobierzyce, Poland
- Contact Email of Data Protection Officer : rodo.gdpr@lgensol.com

How to contact the supervisory authority

Should you wish to report a complaint or if you feel that the Company has not addressed your concern in a satisfactory manner, you may contact the responsible supervisory authority.

You can find the contact details for all EU supervisory authorities at https://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080.

Changes to our Privacy Policy

The Company keeps its Privacy Policy under regular review and places any updates on this web page. This Privacy Policy was last update on **January.22.2022**