

Data Protection Notice for Online Calls, Meetings, Conferences, and Webinars on “Microsoft Teams”

This Data Protection Notice for Online Calls, Meetings, Conferences, and Webinars on “Microsoft Teams” (“**Notice**”) explains how Personal Data is processed during online calls, meetings, conferences, and webinars (collectively “**Meetings**”) conducted via Microsoft Teams (“**Teams**”), or any other similar or compatible online communication and collaboration platform.

Scope

This Notice applies to all Meetings, regardless of whether they are: scheduled or ad-hoc, one-to-one or group discussions, audio-only or video-enabled, and attended by internal (Sun Chemical employees) and/or external participants (collectively “**Attendees**”).

If you are a Sun Chemical employee, please note that all Personal Data shall be processed in accordance with the Sun Chemical Privacy Policy for employees and any applicable HR Privacy Notices.

When we refer to “we” in this Notice, we are referring to Sun Chemical Group Cooperatief U.A., together with any and all of its affiliates, that organize, host, and/or record and transcribe Meetings.

Definitions

- **Data Controller:** Sun Chemical will act as the Data Controller, and determines the purposes and means of processing the Personal Data.
- **Data Processor:** Teams acts as the Data Processor, and processes Personal Data on behalf of the Data Controller.
- **Data Subject:** Any identified or identifiable natural person.
- **GDPR:** General Data Protection Regulation (EU) 2016/679.
- **Host(s):** A Sun Chemical employee, who is authorized to manage the Meeting on Teams, in terms of controlling any possible recording and transcribing, and ensuring compliance with Sun Chemical’s internal recording and transcribing guidelines (“**Guidelines**”).
- **Microsoft Teams:** a service of Microsoft Corporation, as part of the Microsoft 365 family of products.
- **Personal Data:** Any information that relates to a Data Subject. If a Meeting is recorded and transcribed, and depending on its content, this may include special categories of Personal Data.

Types of Processed Personal Data

In general, when conducting a Meeting on Teams, various types of Personal Data are processed. The scope of the data also depends on the data you provide before or during a Meeting. The following Personal Data may become subject to processing:

- **Attendee details:** e.g., display name, e-mail address, profile picture, department, preferred language, phone.
- **Meeting metadata:** e.g., date, time, meeting ID, phone numbers, location.
- **Text, audio, and video data:** You may have the opportunity to use the Teams chat function in a Meeting. In this respect, the text entries you make are processed in order to display them in the Teams Meetings. In order to enable the display of video and the playback of audio, the data from the microphone of your terminal device as well as from any video camera of the terminal device will be processed accordingly for the duration of the Meeting. You can turn off and/or mute the camera and/or microphone yourself at any time via the Teams Meeting.

- **Screen sharing:** the contents that are visible when sharing your desktop screen, e.g., calendar meetings, contacts, files, etc.), and presentations (e.g., slides) used during the Teams Meeting.

If you are registered as a user at Teams or attend a Meeting as a guest, reports on the Meeting (e.g., meeting metadata, phone dial-in data, questions and answers, survey function) may be stored in Teams beyond the end of the Meeting.

Further information on how Teams deals with such data can be found at <https://privacy.microsoft.com/en-us/privacystatement> and <https://docs.microsoft.com/en-us/microsoftteams/teams-privacy>.

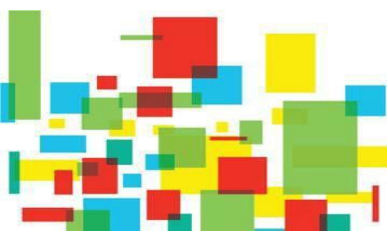
Recording and Transcribing Meetings

The Meetings may only be recorded and transcribed by pre-approved Hosts in limited circumstances in accordance with the Guidelines, found [here](#) (internal document). The Hosts will comply with the Guidelines before, during, and after recording and transcribing the Meeting. Attendees will be informed transparently in advance if a Meeting will be recorded and transcribed.

Legal Basis for Data Processing

Our data processing is based on the following legal provisions:

- As far as external Attendees are concerned, the legal basis will be Article 6(1)(b) GDPR in those cases where the Meeting is held as part of a contractual relationship.
- As far as internal Attendees are concerned, the legal basis will be Article 6 (1)(b) GDPR provided that the processing is necessary for the fulfilment of the employment relationship. As far as internal Attendees who are employees located in Germany are concerned, the processing of Personal Data is carried out in accordance with Article 88 GDPR in conjunction with § 26(1) sentence 1 of the German Federal Data Protection Act (*Bundesdatenschutzgesetz* – BDSG), insofar as such processing is necessary for the establishment, performance, or termination of the employment relationship, including internal communication and collaboration via Teams. Where applicable, such processing is additionally governed by a works council agreement (*Betriebsvereinbarung*) regulating the use of Teams, including audio-visual communication and recordings.
- If Personal Data is not required for the contract performance with external Attendees or the fulfilment of the employment relationship with internal Attendees, Article 6 (1)(f) GDPR (Sun Chemical’s legitimate interests) may justify the data processing. We have a legitimate interest in using modern means of communication that includes the transmission of audio-visual content.
- If we record and transcribe a Meeting and you, as an internal or external Attendee, have given your explicit consent for the recording of your audio and/or visual data, as well as the transcription of your voice, via the Teams’ consent feature, we will process your Personal Data based on Article 6 (1)(a) GDPR, and, for employees located in Germany, § 26(2) BDSG. Your consent will be logged into the Microsoft Purview Audit Logs. You can withdraw your consent at any time during the Meeting by switching off your microphone (for audio recording and transcription) and/or switching off your camera (for video recording). From the moment of withdrawal, no further audio and/or visual data of the withdrawing Attendee will be recorded or transcribed. Withdrawing consent does not affect your ability to continue being present in the Meeting in a non-recorded manner. Withdrawal will not result



in any negative consequence or disadvantage. Please note that data processing (recording or transcription) carried out prior to the withdrawal remains legal. Such data will be processed only in accordance with the originally stated purpose and applicable retention periods.

Automated decision-making in the sense of Art. 22 GDPR is not used.

Recipients / Disclosure of Personal Data

Personal Data processed in connection with attendance in Teams Meeting will not be disclosed to externals as a matter of principle unless it is specifically intended for disclosure. Please note that the content of Meetings, as well as face-to-face meetings, is often used to communicate information with customers, prospects, or externals and is therefore intended for disclosure.

The provider of Teams necessarily receives knowledge of the abovementioned data, insofar as this is provided for in the context of our order processing agreement with Teams.

Data Processing Outside the European Union

Personal Data may be transferred to countries outside the European Economic Area whose laws may not afford the same level of protection of personal information. Where necessary, Sun Chemical will ensure that adequate safeguards are in place to comply with the requirements for the international transfer of Personal Data under applicable privacy laws. For transfers of Personal Data outside the European Economic Area, Sun Chemical will use EU Commission-approved Standard Contractual Clauses as safeguards in accordance with the "Commission Implementing Decision (EU) 2021/914 on standard new contractual clauses" of 4 June 2021. If you wish to receive a copy of these safeguards, please contact us through the contact details provided below. The European Commission has determined that certain countries outside the European Union offer an adequate level of data protection (see Article 45 GDPR). You can find an overview of these countries [here](#).

Data Subject Rights

You have the right to information about the Personal Data concerning you. In the case of a request for information that is not made in writing, we ask for your understanding that we may require proof from you that you are the person you claim to be. Furthermore, you have a right to rectification or deletion or to restriction of processing, insofar as you are entitled to this by law. Finally, you have a right to object to processing within the limits of the law. A right to data portability also exists within the framework of the data protection regulations.

Storage and Deletion of Personal Data

Personal Data and any recorded and transcribed Meeting will be stored until there is no need for further storage in accordance with the purpose of its collection. In the case of statutory retention obligations, deletion will only be considered after expiration of the applicable retention obligation.

Data Protection Officer

We have appointed a Data Protection Officer who can be reached as follows for any information or questions relating to your Personal Data as a Data Subject: SC-Data-Privacy@sunchemical.com

Right of Appeal to a Supervisory Authority

You have the right to complain to a data protection Supervisory Authority about how we process your Personal Data and comply with data protection regulations. You should write to the Supervisory Authority and clearly outline your case, so that (s)he can investigate according to the complaint procedure.

Amendment of this Notice

We reserve the right to revise this Notice in the event of changes to data processing requirements and/or applicable laws, or as may otherwise be necessary.

Date: March 2026

