

# HUMAN RESOURCES DATA EU-U.S. DATA PRIVACY FRAMEWORK NOTICE

**Effective Date:** July 1, 2025

Monument Chemical, LLC (“Monument,” “we,” “us,” or “our”) adopt this Human Resources Data Privacy Framework Notice (this “Notice”) to comply with the EU-U.S. Data Privacy Framework (“DPF”). This Notice informs you of what data we may collect from you as an employee and how we may use and disclose that information. It also describes your choices regarding your Human Resources Data.

## **Definition Specific to this Notice**

“Personal Data” under the DPF means data about an identified or identifiable individual that are within the scope of the General Data Protection Regulation, Regulation (EU) 2016/679 (“GDPR”), received by Monument in the United States from the European Union, and recorded in any form. “Personal Data” includes Human Resources Data and Sensitive Data.

“Human Resources Data” or “HR Data” means Personal Data about employees in the European Union (past or present) collected in the context of the employment relationship and transferred to Monument in the United States under the DPF for use in the context of the employment relationship.

“Sensitive Data” means Personal Data specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, or information specifying the sex life of an employee. Sensitive Data shall also include any Personal Data received by Company from a third party where the third party identifies and treats such Personal Data as sensitive.

## **Statement of Participation**

Monument participates in and complies with the EU-U.S. Data Privacy Framework (“DPF”) as set forth by the U.S. Department of Commerce. We have certified to the U.S. Department of Commerce that we adhere to the DPF Principles regarding the processing of Personal Data and Human Resources Data received from the European Union in reliance on the DPF. If there is any conflict between the terms in this Privacy Notice and the DPF Principles, the Principles shall govern. To learn more about the DPF program and to view our certification, please visit <https://www.dataprivacyframework.gov/s/>.

## **The Data We Collect**

The chart below shows the categories of HR Data we collect about you and examples of the type of HR Data in each category.

<b><u>Category of HR Data</u></b>	<b><u>Examples</u></b>
<b>Unique identifiers</b>	Name, signature, address, telephone, email, account name, passport number, online identifier, IP address(es)

<b>Government ID number</b>	Passport number, driver’s license number, or other government identification card number
<b>Physical description</b>	Physical characteristics or description
<b>Financial information</b>	Bank account number, credit card number, debit card number, or any other financial information
<b>Health/medical information</b>	Medical information or health insurance information
<b>Biometric data</b>	Fingerprints, facial scans, eye scans, voice recognition, typing cadence, and any other biometric identifier that we may use for security or other operational purposes
<b>Insurance information</b>	Insurance policy number, health insurance information
<b>Protected class data</b>	Characteristics of protected classifications under applicable law, including: race, ancestry, national origin, age (40 years or older), marital status, sex, gender identity, sexual orientation, medical condition, disability, genetics, language, and veteran or military status
<b>Internet activity</b>	Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and use of our information technology resources
<b>Geolocation data</b>	GPS coordinates, location-tracking information, physical location or movements
<b>Employment information</b>	Professional or employment-related information
<b>Education information</b>	Personally identifiable education information that is not publicly available (e.g. grades, financial aid)
<b>Audiovisual Information</b>	On-site security cameras, pictures, video and audio recordings
<b>Inferences</b>	Inferences drawn from any of the information identified in this subdivision to create a profile about an applicant or employee reflecting the individual’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes

**The Use of Human Resources Data**

We may use the HR Data we collect for one or more of the following purposes:

- **Workforce Management**, including but not limited to, the following uses:

- To evaluate individuals for a position with us when applying for a position or we receive the individual's information related to a position with our companies
- To comply with applicable laws requiring employers to maintain certain records
- To process payroll and manage applicable tax withholding and reporting
- To administer and maintain employee benefits, additional wellness programs, disability insurance, leave programs and additional fringe benefit programs
- To manage and/or analyze all aspects of employee performance of their job duties and employment, including, but not limited to, training, talent management, periodic reviews, performance tracking, promotions, and discipline
- For surveys, research, analysis, and strategic development to implement, maintain, and promote an engaging work experience with the company
- To review and audit employee interactions with the company's customers and business partners
- To produce, analyze, and report on workforce metrics and other business key performance indicators
- For employee and facility security
- To support information technology services to the workforce
- For emergency training and emergency response
- **Legal/Compliance/Regulatory**, including but not limited to, the following uses:
  - To meet additional legal, compliance, and regulatory requirements
  - To defend the company's rights and property
- **Detecting and Protecting**, including but not limited to, the following uses:
  - Detecting and protecting against security incidents and malicious, deceptive, fraudulent or illegal activity, or violations of the company's policies or the law
  - For fraud and crime prevention
  - For information protection and cybersecurity
- **Backups and Archives** including but not limited to, the following uses:
  - For disaster recovery, business continuity and record keeping obligations

### **Disclosure of Your Human Resources Data**

We may disclose your HR Data to the following categories of third parties:

- **Affiliates and Service Providers.** We may disclose your HR Data to our affiliates and service providers for the purposes described in "The Use of Human Resources Data" section above. Our service providers provide us with services related to hiring, website services, web hosting, data analysis, customer service, infrastructure services, technology services, email delivery services, legal services, and other similar services. We grant our service providers access to HR Data only to the extent needed for them to perform their functions, and require them to protect the confidentiality and security of such data.
- **Other Businesses.** We may disclose your HR Data to other entities as reasonably necessary to facilitate a merger, sale, joint venture or collaboration, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

- **Governmental or Public Authorities.** We may disclose your HR Data to government authorities, including regulatory agencies and courts, as reasonably necessary for our business operational purposes, to assert and defend legal claims, and otherwise as permitted or required by law. We may also be required to disclose your HR Data to public authorities, in response to lawful requests from such authorities, including to meet national security or law enforcement requirements.

With respect to onward transfers of your HR Data to third parties under the DPF, we take responsibility for such third parties' compliance with the DPF Principles when such third parties process your HR Data on our behalf.

### **Recourse and Enforcement**

In compliance with the DPF Principles, we commit to resolve complaints about our collection or use of your HR Data. If you have any inquiries or complaints about our policies related to the DPF, you should first contact us at [mrenap@monumentchemical.com](mailto:mrenap@monumentchemical.com).

We have further agreed to cooperate with the European Data Protection Authorities, [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en), for the purpose of handling any unresolved complaints regarding Human Resources Data. You may engage your local Data Protection and/or Labor Authority concerning our adherence to the DPF and we shall respond directly to such authorities with regard to investigations and resolution of complaints. In addition, under certain limited conditions, you may invoke binding arbitration as a last resort before the EU-U.S. Data Privacy Framework Panel.

We are subject to the investigatory and enforcement powers of the United States Federal Trade Commission with respect to our compliance with the DPF and our representations concerning Personal Data and HR Data received from the EU in reliance on the DPF.

### **Correcting, Accessing, and Exercising Choice Regarding Your Data**

If we intend to use your HR Data for purposes outside of the purposes described above (such as marketing communications) or disclose your HR Data to a third party, we will offer you the opportunity to affirmatively or explicitly consent (opt-out) whether your HR Data is (1) to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized by you or (2) to be disclosed to a third party. For any HR Data that constitutes Sensitive Data, we will give you an affirmative or explicit (opt in) choice if the information is to be disclosed to another entity or used for a purpose other than which it was originally collected or subsequently authorized by you. You will be provided with clear and conspicuous, readily available, and affordable mechanisms to exercise these choices.

You also have the right to access, correct, or request deletion of your HR Data, subject to a few limitations. To access, correct, or request deletion of your HR Data, please contact Mario Renap at [mrenap@monumentchemical.com](mailto:mrenap@monumentchemical.com). To protect your data from unauthorized access or alteration by other entities, all requests to correct or access your information will be subject to verification of your identity. In certain circumstances, we may be required by law to retain your HR Data in order to continue facilitating your employment. We will respond to your request in a reasonable amount of time.

**Additional Information**

If you would like additional information regarding this Privacy Notice, please contact Mario Renap at [mrenap@monumentchemical.com](mailto:mrenap@monumentchemical.com).

**Changes to this Notice**

Monument reserves the right to amend this Notice at our discretion and at any time, consistent with the DPF and GDPR. If we make changes to this Notice, we will so notify you and will post an updated notice on [Monument Connect](#).