

1. Data Protection Policy

In recognition of the financial, operational and regulatory risks inherent in the collection, storage and processing of personal data and, in recognition of the need to comply with all applicable data privacy laws and regulations, the Group mandates that standards set out in this Policy are complied with at all times. The Group holds those individuals referenced in this Policy accountable for fulfilling their stated roles and responsibilities. This Policy is owned by the Group Data Protection Officer. It is part of a suite of documents which covers compliance with data protection, including the General Data Protection Regulations, and should be read alongside those documents, which comprise the Guidelines to Application of the Data Protection Policy, the Data Subject Rights Policy and the Employee Fair Processing Notice. This Policy may be amended or updated from time to time, and new versions of the Policy will be published on the Bodycote intranet.

2. Policy Standards

- 2.1 Personal data must be collected, stored and processed fairly, lawfully, and in a transparent manner; specifically, Bodycote must:
 - 2.1.1 have permission from that person to obtain and process the information;
 - 2.1.2 have lawful grounds for collecting and using the information;
 - 2.1.3 be transparent about the intended use of the information;
 - 2.1.4 use the information in ways that the data subject would reasonably expect;
 - 2.1.5 only collect information that is reasonable and necessary for the reason it is being held; and
 - 2.1.6 accurately record all processing activities in its Data Inventory.
- 2.2 Personal data must only be collected for specified, explicit and legitimate purposes and only processed in a manner compatible with those purposes; specifically, Bodycote must:
 - 2.2.1 comply with fair processing requirements, as required under local law; and
 - 2.2.2 ensure that, if Bodycote wishes to use or disclose information for any purpose that is additional to or different from the originally specified purpose, the new use or disclosure is fair and lawful.
- 2.3 Personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- 2.4 Personal data must be accurate and kept up to date; specifically, Bodycote must:
 - 2.4.1 take reasonable steps to ensure the accuracy of any information obtained and where personal data are inaccurate (considering the purposes to which they are

processed) erase or rectify such inaccurate data without delay;

2.4.2 ensure that the source of any information is clear;

2.4.3 carefully consider any challenges to the accuracy of the information; and

2.4.4 consider whether it is necessary to update the information.

2.5 Bodycote must only retain personal data for as long as is necessary to achieve its specified purpose(s) and in accordance with applicable law.

2.6 Personal data must be processed in a manner that ensures appropriate security of the personal data including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage using appropriate technical or organisational measures.

2.7 Bodycote is responsible for, and must be able to demonstrate, compliance with all the policy standards set out in this Data Protection Policy and applicable data privacy law and regulations.

2.8 Bodycote must ensure that personal data originating in the European Economic Area (EEA) is not to be transferred outside of the EEA, unless the recipient country or territory maintains an adequate level of protection for the rights and freedoms of individuals concerned in relation to the processing of personal data or that appropriate measures are taken to protect the data in accordance with applicable laws, permissions and contractual obligations.

2.9 Bodycote has a duty to notify relevant personal data breaches to the relevant supervisory authority within 72 hours of becoming aware of the breach. In respect of serious breaches, there may also be a requirement to notify the affected data subjects. All personal data breaches should be investigated and dealt with strictly in accordance with Bodycote's Data Security Incident Response Plan.

2.10 Personal data must be processed in accordance with the applicable rights of the data subject, including but not limited to:

2.10.1 the right to access information held;

2.10.2 the right to object to processing (including where personal data are processed for direct marketing purposes);

2.10.3 right to the erasure/deletions of personal data concerning the data subject;

2.10.4 the right to restrict processing;

2.10.5 the right to data portability;

2.10.6 the right to object to decisions being taken by automated means, including

profiling;

2.10.7 the right to have inaccurate or incomplete information rectified or completed; and

2.10.8 the right to claim compensation for damages caused by a breach of law.

2.11 All relevant third parties must periodically evidence and confirm that the personal data they hold relating to Bodycote and/or its customers, is held in an appropriate, secure manner, in accordance with all applicable data privacy laws and regulations and that a written contract is in place between Bodycote and any such third party containing appropriate data protection obligations.

2.12 All breaches of applicable data privacy laws and regulations, and incidences of non-compliance with the minimum standards set out in this Policy must be reported to the Group Data Protection Officer and recorded centrally and promptly and properly addressed by the Group Data Protection Officer.

3. Governance

Policy Owner Board of Directors

Policy Cycle Review annually/in the event of a change to law or regulation

Policy Reviewer Chief Financial Officer

Policy Implementer Group Data Protection Officer

4. Application, Monitoring and Non-compliance Handling

The standards set out in this Policy apply group-wide to all Bodycote entities and businesses (and each of their staff and business partners) when handling personal data.

This Policy shall be monitored to ensure its effectiveness. The Policy Implementer shall promptly report to Policy Owner relevant breaches of and exceptions to this Policy.

5. Roles & Responsibilities

Activity	Accountable Individual	Assistance from:
Ensuring compliance with Policy Standards	Group Data Protection Officer	Company Secretary
Responding to data subject rights	Group Data Protection Officer	Company Secretary

Reporting incidents of non-compliance	Group Data Protection Officer	
Mechanisms for reporting non-compliance	Group Data Protection Officer	Company Secretary
Handling incidents of non-compliance	Group Data Protection Officer	Company Secretary
Maintenance of the Data Inventory	Group Data Protection Officer	Company Secretary
Completion of Data Protection Impact Assessments	Group Head of Risk	Group Data Protection Officer
Maintenance of DP incidents register	Group Data Protection Officer	
Notifications to Data Protection Authorities	Group Data Protection Officer	Company Secretary
Guidance		
Personal Data Q&A	Group Data Protection Officer	
Data Protection laws (and interpretation)	Group Data Protection Officer	
Fair Processing Notices	Group Data Protection Officer	
Privacy Statements	Group Data Protection Officer	
Data Subject Rights Policy	Group Data Protection Officer	
Data Retention/ Records Management Policy and Guidelines	Group Data Protection Officer	
Guidelines regarding the application of this Data Protection Policy	Group Data Protection Officer	Company Secretary

If you have any further questions please contact the Group General Counsel at Bodycote plc head office +44 (0)1625 505300.