



Leviat

Personal Data Privacy Policy

Date: June 2026

I. Introduction

This Personal Data Privacy Policy (the “Privacy Policy”) explains how applicable Leviat (“the company”) process personal data when you are employed by the company or conduct business with the company. For Leviat US entities, this Policy applies only to the extent required under the General Data Protection Regulation (GDPR).

Personal data is processed in line with the GDPR (Regulation (EU) 2016/679) as well as all other applicable European and national privacy laws and regulations (collectively referred to as the “data protection law”).

This Privacy Policy covers all personal data that we process in our role as a data controller. To the extent the company decides why and how personal data is processed, the company is a data controller of such personal data. In this capacity, the company may process personal data relating to employees, former employees and their family members, temporary workers, self-employed individuals, job applicants, contractors, supplier contacts, customers, and visitors.

II. Statement of Policy

The purpose of this Privacy Policy is to explain what personal data we process, as well as how and why we process it. It also sets out our responsibilities and obligations regarding the protection of personal data.

This Privacy Policy is not an exhaustive statement of our data protection practices and notice of variations will be given to the extent practical (see GDPR Toolkit Guidelines, found in Supplementary Documentation).

The company processes personal data solely for the purposes for which it was originally collected.

Leviat retains the right to make personal data processing decisions in relation to:

- Cross-border processing (transfers) of personal data involving the company
- Cross-border personal data breaches (as defined in the Personal Data Breach Procedure, see GDPR Toolkit Guidelines) concerning the company (collectively referred to as “cross border issues”).

To support this, the Leviat Compliance Team will carry out the relevant decision-making on behalf of Leviat. In this regard, the role of the Compliance Team is to:

- Make final decisions regarding cross border processing of personal data.
- Act as the company’s point of contact with data protection regulators in relation to cross border issues.
- Oversee the resolution, recording and reporting of cross-border breaches (in accordance with the Personal Data Breach Procedure, see GDPR Toolkit Guidelines)

III. Roles and Responsibilities

Employees are required to:

- Comply with the most up-to-date version of this Privacy Policy.

Company management are required to:

- Take responsibility for the processing of personal data and ensure compliance with this Policy.
- Designate a primary point of contact in each Leviat entity responsible for:
 - The processing of personal data relating to current and former employees and contractors.
 - The processing of personal data relating to business contacts.

- Maintaining the security and integrity of all personal data processed by the company

IV. Monitoring, Assurance and Breach Reporting

Monitoring

The Leviat Compliance Team shall provide support to the company by guiding the business in interpreting the data protection law and this Privacy Policy on a local level.

The Leviat Compliance Team reserves the rights to review employees’ activities, including company e-mails, to ensure compliance with this Policy.

You can ask a question about the processing of your personal data by contacting your local HR manager.

Reporting

Failure to adhere to this Policy, whether intentional or due to negligence, may lead to disciplinary procedures being fully enforced, including termination of employment and/or relevant contracts.

Any suspected or actual violations of this Policy may be reported confidentially via the Leviat Hotline.

If you suspect that a breach of this Policy has caused the unauthorised disclosure, deletion or amendment of personal data, please refer to the Personal Data Breach Procedure (see GDPR Toolkit Guidelines) and report the matter in accordance with the procedure.

V. Relevant Contact Details

In the event of any questions with regards to the content, context or meaning of this document please contact your local compliance contact or the Legal and Compliance team.

Responsibility	Name	Email	Direct Dial
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