Privacy Manual

This Manual sets out the rules and procedures to be complied with when processing personal data within the Group. If you have any questions regarding the contents of this Manual, please contact the Global Data Protection Officer (“GDPO”) in Group Legal Affairs.

For more information, see the ROCKWOOL Privacy Handbook here.

**1. Policy owner**

1.1 The CFO is the overall Policy Owner and responsible for the Compliance Programme laid down in this Manual.

**2. Governance**

2.1 To ensure compliance with the BCRs and general privacy regulation, a global data protection officer organisation (“DPO Organisation”) has been established consisting of a Global Data Protection Officer (“GDPO”) and the local/regional data protection officers (“LDPOs”). An overview of the current DPO Organisation is available here.

2.2 The DPO Organisation ensures that privacy policies and processes are established, that any complaints or questions regarding personal data are properly dealt with and surveys the use of data processors and transfer of personal data outside the Group.

2.3 The GDPO reports directly to Group Management. The GDPO’s reporting is formally structured via the Group’s Integrity Committee meetings or ad hoc in urgent matters. The Group Integrity Officer ensures that the GDPO’s reports are filed to the Committee unaltered and – if the GDPO so requires in special situations – unhalted.

2.4 The GDPO is authorised to introduce internal rules setting out approval requirements for processing of personal data, e.g. in relation to data processing agreements, data protection by design, data protection by default, DPIAs, etc.

**3. ROCKWOOL Group Binding Corporate Rules**

3.1 In order to comply with the increasing and complex regulation of processing of personal data across the world but particularly within the EU, the Group has implemented a set of global data privacy rules which all employees and members of the management and boards of each entity within the Group shall comply with; Binding Corporate Rules (the “BCRs”). The Privacy policy and this Manual set out the general requirements from the BCRs which are available here.

**4. Scope**

4.1 The Manual applies to all members of the Rockwool Group and all employees, however, local differences may apply as per local law.