

UK BCR SUMMARY

Jotun Paints (Europe) LTD and all Jotun Group Companies are committed to safeguarding the personal data of employees, customers, and suppliers. Jotun has implemented EU Binding Corporate Rules (EU BCR) to ensure compliance with European data protection laws, particularly for data transfers outside the European Economic Area (EEA).

The UK BCR Addendum extends the EU BCR to cover transfer of personal data by the territorial scope of Article 3 UK GDPR. Together, these form Jotun's UK Binding Corporate Rules (UK BCR).

The UK BCR governs all Jotun entities involved in data processing and transfer, ensuring compliance with the UK General Data Protection Regulation (UK GDPR). This framework governs the collection, processing, and sharing of personal data within Jotun. Its objective is to inform individuals about their data processing, rights under the UK BCR, and enforcement mechanisms within Jotun.

Contact details	
Queries from relevant data subjects	For inquiries from relevant data subjects regarding the BCR or other privacy-related questions, please contact Jotun's official data protection e-mail at: dataprotection@jotun.com

Appendix I lists all UK BCR Members, their locations and contact details, and the countries to which personal data is transferred.

Definitions

Term	Definition
BCR	Binding Corporate Rules for personal data.
Consent	Freely given, specific, informed and explicit indication of wishes by which employees or relevant data subjects signify their agreement to processing of their personal data for one or more specific purposes.
Controller	Natural or legal person, public authority, agency or other body which determines the purposes and means of the processing of personal data

Controller BCR	When the initial Restricted Transfer is made to a member of the BCR that is acting as a controller.
Customer	Any organization buying products and services from Jotun, including consumers of Jotun's products and services.
Employee	Permanent employee, temporary and non-permanent employee, job applicant or former employee of Jotun. People working at Jotun as consultants or employees of External Parties providing services to Jotun, are also included.
EU GDPR	European Union Regulation (EU), adopted on April 27, 2016. Establishes rules for protecting natural persons in relation to the processing of personal data and the free movement of such data, repealing Directive 95/46/EC (The General Data Protection Directive).
EU BCR	Framework that allows multinational organizations to transfer personal data between their entities within the European Economic Area (EEA) and to countries outside the EEA.
UK GDPR	The General Data Protection Regulation (Regulation (EU) 2016/679) as it has been retained in UK law under the European Union (Withdrawal) Act 2018 after Brexit.
UK	The United Kingdom of Great Britain and Northern Ireland.
Jotun A/S	Parent company having its registered seat in Sandefjord, Norway.
Group Company	Jotun A/S and any company or legal entity of which Jotun A/S, directly or indirectly owns more than 50% of the issued shared capital, has 50% or more of the voting power at general meetings of shareholders, has the power to appoint a majority of the directors, or otherwise directs the activities of such other legal entity.
Jotun	Jotun AS and its Group companies.
Third Country	Any country or territory outside of the UK.

Third party beneficiaries	Third party beneficiaries shall mean individuals who are not necessarily a direct party to the BCR but is granted specific rights under the given BCR.
Personal Data	Any information relating to an identified or identifiable person.
Personal Data Breach	A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.
Processor	Specific Jotun entity which processes personal data on behalf of a Controller.
Processing	Any operation performed on personal data, whether or not by automatic means, such as collection, recording, storage, organization, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.
Relevant Data Subjects	Identifiable, living natural person that is either an employee, a customer, an employee of a customer, a supplier or an employee of a supplier, to whom personal data relates. In fact, data subject of any transferred data.
Restricted Transfers	A transfer of personal data to a recipient in a country or territory outside the UK (or an international organization) where the conditions in Chapter V of the UK GDPR must be met to ensure adequate protection of the data.
Special Categories of Personal Data	Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purposes of uniquely identifying a natural person, data concerning health, or data concerning a natural person's sex life or sexual orientation.
Supplier	Company providing services or products to Jotun.
ICO	The Information Commissioner. Which is the independent authority in the United Kingdom responsible for upholding information rights and enforcing data protection laws, such as the UK GDPR.

Restricted Transfers covered by the UK BCR Addendum

The UK BCR Addendum governs all transfers and processing of personal data between Group Companies, ensuring adequate protection when transferring data outside UK.

Relevant data subjects include:

- Jotun employees, customers, suppliers, and their respective employees.

Categories of personal data processed encompass necessary business operations data and, in some cases, special categories of personal data.

Personal data categories:	Special categories of personal data:
<ul style="list-style-type: none">• Name, employee ID, Address, social security number, passport number, photo, video, IP address, location data, Advertising ID or other online identifiers etc.	<ul style="list-style-type: none">• Racial or ethnic origin, political opinion, religious and philosophical views, trade union membership, genetic data, biometric data, data concerning health, natural persons sex life or sexual orientation.

Processing includes electronic and paper-based methods, ensuring compliance with UK laws.

Rights of relevant data subjects

All relevant data subjects of Jotun have rights regarding the processing of their personal data as described in the EU BCR section *4.2 Rights of Access and Rectification*. In short, section 4.2 refers to the following rights regarding Processing of personal data:

- *To have Personal Data Processed according to the data protection principles and in a transparent manner with easy access to the BCR.*
- *To access and rectify Personal Data.*
- *To have Personal Data deleted and restricted or object to Processing.*
- *To enforce liability and jurisdiction provisions, obtain judicial remedies and redress, and obtain compensation in case of any breach of one of the enforceable elements.*
- *To lodge a complaint internally in Jotun as well as with a competent supervisory authority or the courts. Hereunder, the data subject has the right to lodge a complaint to The Information Commissioner (ICO) and any courts in the UK listed in the section “Complaint from relevant data subject” below.*

Furthermore, and according to Article 47 (2) (e) UK GDPR, all relevant data subjects have the right to not be subject to decisions based *solely* on automated processing, including

profiling, as described in the EU BCR section 4.6 *Automated decision making, including profiling*. In short, section 4.6 refers to the following rights:

- *Automated tools or profiling may be used to make decisions about relevant data subjects, but decisions may not be based solely on the results provided by the automated tool or profiling.*

The restriction does not apply if:

- *The use of automated tools is required or authorized by EU or member state law.*
- *The decision is necessary for entering into or performing a contract between Jotun and the data subject, such as filtering submissions for promotional or contest purposes or managing the employment relationship (e.g., filtering job applications).*

If restrictions do not apply and automated decisions are made, the decisions should not involve special categories of personal data without explicit consent or legal justification. Relevant data subjects must be informed about the logic and consequences of automated processing and have the right to human intervention and to contest decisions.

Complaints from relevant data subject

Complaints to Jotun

Relevant data subjects can file complaints regarding personal data handling to dataprotection@jotun.com, which will be addressed within 30 days. Details are available in the complaint procedure document in **Appendix II**.

Complaints can also be made to a Data Protection Authority, either in Norway or in the complainant's country of residence, work, or where the violation occurred. Contact details for Jotun's lead authority are available [online](#).

Complaints to ICO

Relevant data subjects can file a complaint to the ICO about Jotun's UK BCR or generally if you think Jotun has not handled your personal information in line with good practice. The procedure for filing a complaint with the ICO is described in detailed on their [website](#), and the link to file a complaint is given [here](#). Complaints are being assigned to case officers within 14 weeks of submission to the ICO.

Complaints to UK Court

Relevant data subjects can bring a claim in the UK courts against the Lead UK BCR Member for redress and, where appropriate, compensation for breach of the UK BCR Addendum by the Lead UK BCR Member and any Non-UK BCR Member.

The individual court systems provide guidance on how to initiate a claim in England and Wales, Scotland, and Northern Ireland. The Citizens Advice Bureau offers comprehensive information on pursuing legal action in each of these jurisdictions ([Citizens Advice](#)).

Additional resources can be found at the following websites:

- www.justice.gov.uk for England and Wales
- www.scotcourts.gov.uk for Scotland
- www.courtsni.gov.uk for Northern Ireland

Rights of Third-Party Beneficiaries

Relevant data subjects can enforce their rights as third party beneficiaries and seek compensation for breaches when their personal data is transferred from UK or to UK. Third party beneficiary rights are described in the EU BCR section *1.10 Third party beneficiary rights*.

In short, section 1.10 refers to the following third-party beneficiary rights:

- *To have Personal Data Processed according to the data protection principles* (BCR Art. 1.9) and in a transparent manner with easy access to the BCR (BCR art. 1.6, 2.9 and art. 5 GDPR).
 - *With reference to EU BCR Art. 1.4, the controller is accountable for compliance with the EU BCR. Similarly, the controller is also obliged to comply with the UK BCR Addendum as well.*
- *To access and rectify Personal Data* (BCR art. 4.2).
- *To have Personal Data deleted and restricted or object to Processing* (BCR art. 2.9, 2.7.2 and 3.5, 3.6, 4.2.1 and 4.2.4), and the right not to be subject to decisions based solely on automated processing, including profiling (BCR art. 4.6).
- *To enforce liability and jurisdiction provisions* (BCR art. 4.14, GDPR art. 47.2.e-f), obtain judicial remedies and compensation for breaches, complaints can be lodged internally, with supervisory authorities (GDPR art. 77-82, 79). Hereunder, the data subject has the right to lodge a complaint to the ICO and any courts in the UK listed in the section *“Complaint from relevant data subject”* above.

Appendix	Document name
Appendix I	Appendix I Intra-Group signatory list
Appendix II	Appendix II Request for access and complaint procedure