

Privacy in Accelleron at a glance

Our **People**, **Technology** and **Operations** protect personal data. Privacy and data protection are core Accelleron values and embedded in our corporate policies.

For more information, please go to: <https://acceleron-industries.com/privacy>



People

Accelleron maintains a global privacy team, led by the Group's Data Protection Officer. The global privacy team is supported by our robust network of business function representatives, as well as a global network of external resources, including software, web portals and other support tools. All Accelleron employees are trained in the basics of data privacy and more specialized training is provided for selected job functions. Employees must comply with our internal policies and procedures around privacy and information security. External suppliers have similar requirements.



Technology

Accelleron is a technology-oriented company known for its innovation. Privacy by design is an important feature of all of our projects, initiatives and products. Our Group has implemented our own inhouse privacy management system which, among other things, handles data-related requests from individuals, maintains records of processing activities, and conducts privacy risk assessments. External services and suppliers enhance our knowledge base and capabilities.



Operations

Accelleron has privacy and security controls across its operations, subjecting them to continuous monitoring as well as periodic evaluations and assessments. We have implemented physical, technical and administrative controls across our Group.

Our main focus areas include:

– **Data Security**

We safeguard personal data processed by Accelleron from unauthorized access and unlawful processing or disclosure, as well as accidental loss, modification or destruction.

– **Data Subject Rights**

We fulfil the requirements of all data subject rights, in a process that is easily accessible via the external Accelleron website.

– **Records of Processing Activities**

We document all Group activities, including both global and local personal data processing at Accelleron.

– **Data Protection Controls and Assessments**

We monitor and regularly check compliance with the Accelleron data protection policies and applicable data protection laws, using data protection audits, assessments and other controls.

– **Data Protection Impact Assessments**

We identify, assess, and mitigate or minimize privacy risks in Accelleron data processing activities. The execution of these assessments are monitored in the records of our processing activities.

– **Privacy by Design**

Before introducing new methods of data processing, particularly new Information Technology systems, we define, design and implement technical, organizational and privacy measures to protect data.

– **External Party Risk Management**

Our supplier contracts are drafted and processes developed to meet data privacy requirements. In addition, we have created templates stipulating appropriate privacy standards for use in Accelleron client contracts.

– **Policies and procedures**

We have produced a number of Group level guidelines and supporting materials for the internal use of our businesses to meet data privacy compliance requirements.

– **Process review**

We continuously review our systems and procedures to meet data privacy compliance requirements. These reviews fit with our overall compliance efforts.

– **Training and Awareness**

We carry out an ongoing program of privacy training for Accelleron employees. Training sessions include: data privacy awareness, controller versus processor responsibilities, Accelleron compliance tools, data transfers, privacy notices, privacy by design, and contractual requirements.