

PERSONAL INFORMATION PRIVACY NOTICE FOR EMPLOYEES AND CANDIDATES

Adient plc (registered in Ireland, 25-28 North Wall Quay, IFSC, Dublin, 1), and its subsidiaries and affiliated companies (collectively, **Adient**, we, us or our) care about your privacy and are committed to processing your personal information in accordance with fair information practices and applicable data privacy laws.

Introduction

As a sign of our commitment to privacy, we have adopted a set of Binding Corporate Rules (“BCRs”). These contain our global privacy commitments, including our policy on transfers of personal information and associated individual privacy rights, with the aim of ensuring that your personal information is protected while processed by our affiliates. These BCRs have been approved by the European Data Protection Authorities.

Scope

This notice explains how Adient handles the personal information of employees, applicants, interns, former employees, dependents, beneficiaries, contractors, consultants and temporary agency workers in the course of its human resources activities and for purposes laid down in this notice. We may amend this notice from time to time, should it become necessary to do so. This notice may also be supplemented by other statements as needed to comply with local requirements in the country where you live, or where employees’ representation agreements exist.

Collection and Use of Personal Information

We may collect your personal information to administer our employment or contractual relationship with you and for the purposes specified below. We may collect personal information, either directly from you or from third parties including public databases, social media platforms or recruitment companies. We may collect, use and transfer your personal information through automated and/or paper-based data processing systems. We have established routine processing functions (such as processing for regular payroll and benefits administration). We also process personal information on an occasional or *ad hoc* basis (such as when an employee is being considered for a particular new position, or in the context of changes to an employee’s marital status).

We may collect the following types of personal information:

- Personal identification information, such as your name, home address, date of birth, gender, work- related photographs, and home phone number;
- Government-issued identification numbers, such as national ID for payroll purposes;
- Immigration, right-to-work and residence status;
- Family and emergency contact details;
- Job-related information, such as years of service, work location, employment ID, work record, vacation absences, and contract data;
- Educational and training information, such as your educational awards, certificates and licenses, vocational records and in-house training attendance;
- Recruitment and performance-related data, such as objectives, ratings, comments, feedback results, career history, work equipment, career and succession planning, skills and competencies and other work-related qualifications;
- Information related to your usage of Adient’s assets and the administration of operational activities;
- Information needed for compliance and risk management, such as disciplinary records, background check reports and security data; and
- Payroll- and payment or benefits-related information, such as salary and insurance information, dependents, government identifier or tax numbers, bank account details, and employment related benefits information.

Processing Purposes

We process personal information for the following purposes:

- workforce planning, recruitment and staffing;
- workforce administration, payroll, compensation and benefit programs;
- performance management, learning and development;
- advancement and succession planning;
- legal defense and compliance, including compliance with government authority requests for information, liens, garnishments and tax compliance;
- workplace management, such as travel and expense programs and internal health and safety programs;
- the administration of operational activities, including production related activities;
- the administration of information systems;
- internal reporting;
- audit;
- to protect Adient, its workforce, and the public against injury, theft, legal liability, fraud, abuse, or threat to the security of our networks, communications, systems, facilities and infrastructure; and
- other legal and customary business-related purposes.

Legal Bases for Processing

These uses of personal information are based on one of the following legal bases, as applicable:

- the need to process your personal information for the performance of our employment contract, or to take steps to enter into a contract with you;
- Adient's legal obligations as an employer;
- Adient's legitimate business interests including general human resource administration, general business operations, disclosures for auditing and reporting purposes, internal investigations, contractual obligations with third parties, management of network and information systems security, and the protection of Adient's assets; and
- in some specific and limited circumstances, your consent.

Sensitive Personal Information

In addition, we may process sensitive personal information if it is needed for legitimate business objectives or if it is required to comply with applicable law. Sensitive personal information will not be collected, processed or transferred, except where adequate privacy protection mechanisms are in place and after having first obtained your informed consent, if required by law.

Disclosures and Categories of Recipients

We may disclose your personal information for legitimate purposes to:

- Other Adient entities, joint ventures, subcontractors, vendors or suppliers who perform services on our behalf for the aforementioned purposes;
- A newly formed or acquiring organization if Adient is involved in a merger, sale or a transfer of some or all of its business;
- Any recipient, if we are legally required to do so, such as by court order or applicable law;
- Any recipient, with your consent, such as for employment verification or bank loans; or
- Any recipient when reasonably necessary such as in the event of a life-threatening emergency.

International Transfers

Your personal information may be transferred outside of the country where you work, including to countries that do not provide the same level of protection for your personal information. Adient is committed to protecting the privacy and confidentiality of personal information when it is transferred.

If you are a resident of the EEA, we may transfer your personal information to countries that have not been found by the European Commission to provide adequate protection. Where such transfers occur, we will ensure that adequate protection exists either through appropriate contractual arrangements or as required by law.

Adient has adopted a set of BCRs which have been approved by the relevant European Data Protection Authorities. The BCRs ensure that personal information of covered employees in EEA is protected while being processed by our affiliates. To view our Binding Corporate Rules, please consult the following link: www.adient.com/dataprivacy.

Accuracy

We take reasonable steps to ensure that personal information is accurate, complete, and current. Please note that you have shared responsibility with regard to the accuracy of your personal information. Please notify Human Resources of any changes to your personal information or that of your beneficiaries or dependents.

Your Personal Information Rights

Access, Correction and Transmission. You may reasonably access the personal information pertaining to you that is on file with Adient. You also have the right to request that we correct incomplete, inaccurate or outdated personal information. To the extent required by applicable law, you may also request that we transmit personal information you have provided to us to you or to another company.

Objection. We respect your right to object to any uses or disclosures of your personal information that are not (i) required by law, (ii) necessary for the fulfillment of a contractual obligation (your employment contract), or (iii) required to meet a legitimate need of Adient as an employer (such as general human resource administration disclosures for auditing and reporting purposes, internal investigations, management of network and information systems security, or protection of Adient's assets). If you do object, we will work with you to find a reasonable accommodation. You may also withdraw your consent at any time in relation to our processing of personal information based on your consent.

Deletion. You may request the deletion of your personal information as provided by applicable law. This applies, for instance, where your information is outdated; where the processing is not necessary or is unlawful; where you withdraw your consent to our processing based on such consent; or where we determine we should accommodate an objection you have raised to our processing. In some situations, we may need to retain your personal information pursuant to our legal obligations or for the establishment, exercise or defense of legal claims.

Restriction of processing. Similarly, and where provided by applicable law, you may request that we restrict processing of your personal information while we are answering your request or complaint pertaining to (i) the accuracy of your personal information, (ii) our legitimate interests to process such information, or (iii) the lawfulness of our processing activities. You may also request that we restrict processing of your personal information if you wish to use the personal information for litigation purposes.

You may exercise these rights free of charge by contacting our Privacy Office as described below. However, Adient may charge a reasonable fee or refuse to act on a request if it is manifestly unfounded or excessive in particular because of its repetitive character. In some situations, Adient may refuse to act or may impose limitations on your rights if, for instance, your request is likely to adversely affect the rights and freedoms of Adient or others, prejudice the execution or enforcement of the law, interfere with pending or future litigation, or infringe applicable law. In all cases, you have a right to file a complaint with a Data Protection Authority.

Information Security

Adient takes precautions to protect personal information from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. We have taken appropriate technical and organizational measures to protect the information systems on which your personal information is stored, and we contractually require our suppliers and service providers to protect your personal information.

Retention

Your personal information will be retained as long as necessary to achieve the purpose for which it was collected, usually for the duration of any contractual relationship and for any period thereafter as legally required or permitted by applicable law. Our retention policies reflect applicable statute of limitation periods and legal requirements.

How to contact us and obtain further information

If you have any questions about this notice or if you believe that your personal information is not handled in accordance with the applicable law or this notice, or if you want to exercise your rights, you have several options:

- Consult the [Privacy Portal](#) to identify and contact your local Data Privacy point of contact
- Contact the Privacy Office at ae-privacy@adient.com or at

Adient Belgium BVBA
De Kleetlaan 7b,
1831 Diegem,
Belgium

- Discuss the issue with your supervisor or another supervisor or manager
- Contact the Human Resources department
- You may also contact Adient 24-hour Integrity Helpline:
 - File a report online via the Internet: adient.ethicspoint.com
 - File a report by phone: you will find toll free phone numbers listed for all countries where Adient conducts business on adient.ethicspoint.com. Interpreters are available in most local languages.

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