



# Privacy Statement

October 23, 2024



## 1. BE Semiconductor Industries N.V. privacy statement

- I. The **responsible body** and data controller of your personal data under the General Data Protection Regulation (“GDPR”) and other data protection laws is:

BE Semiconductor Industries N.V. (“Besì” or “the Company”)  
Ratio 6, 6921 RW Duiven, the Netherlands  
[www.besi.com](http://www.besi.com)

- II. Contact for data protection queries: For queries, suggestions or complaints as to the processing of your data, contact our data protection coordinator at:

Data Protection Coordinator  
BE Semiconductor Industries N.V.  
Ratio 6  
6921 RW Duiven, the Netherlands  
[dataprotection@besi.com](mailto:dataprotection@besi.com)

- III. Responsible **supervisory authority** for data protection matters (you can contact your local supervisory authority with any complaints):

### **Austria**

Österreichische Datenschutzbehörde  
Barichgasse 40-42  
A-1080 Wien  
[dsb@dsb.gv.at](mailto:dsb@dsb.gv.at)

### **Netherlands**

Autoriteit Persoonsgegevens  
Postbus 93374  
NL-2509 AJ DEN HAAG  
Tel: (+31) - (0)70 - 888 85 00  
Fax: (+31) - (0)70 - 888 85 01

### **Switzerland**

Eidgenössischer Datenschutz- und Öffentlichkeitsbeauftragter  
Feldeggweg 1  
CH-3003 Bern  
Tel: (+41) - (0)58 - 462 43 95 (Mo. to Fr., 10.00 to 12.00 hours)  
Fax: (+41) - (0)58 - 465 99 96

## 2. Data protection principles

For Besì, trust is a vital cornerstone in every business relationship, which is why we attach great importance to the secure and sensitive management of your data.

This privacy statement is intended to give you an insight into which personal data is used, for what purpose and what options are available to you as the data subject for getting



the best possible overview of what happens to your data and what rights you have in this regard. Besic operates a consistent and continuous data protection management system in order to systematically plan, organize, manage and monitor legal and operational data protection requirements. Our goal is to ensure the rights and freedoms of those concerned, and recognize business-related risks arising from data protection and to be able to manage these accordingly.

This means for you, as the data subject, that:

- You are made aware of what personal data we hold about you and the purposes we use it for.
- Where you have given your consent for the processing of your personal data, you are able to withdraw your consent to such processing at any time. Your withdrawal does not affect the lawfulness of the processing before your withdrawal.
- We respect your rights under the data protection laws.
- Our information processing security measures comply with the latest standards and with statutory requirements.
- Our employees are obliged to maintain confidentiality and receive regular training on data handling best practices.
- Compliance with data protection provisions is monitored by the data protection coordinator who can be contacted directly by email should you have any questions.

We have endeavored to be as transparent as possible. This privacy statement describes how we handle personal data of the representatives/contact persons of our (potential) customers and suppliers and of job applicants. It also contains information regarding our websites and how we use cookies.

We invite you to read this declaration carefully and familiarize yourself with our practices. This also applies if you have already been a customer or supplier of Besic for many years.

If you have any questions, you can contact us at any time – our contact details are set out at the beginning of this declaration.

### **3. Type or categories of personal data we process**

Personal data is all that information that relates to an identified or identifiable natural person. We store and process personal data only as far as is directly necessary for running, building and developing our business across our entire service range – from development, manufacturing, marketing, sales and service of semiconductor assembly equipment for the global semiconductor and electronics industries.

We gather your personal data when you choose to provide it to us or when our (potential) customer or supplier chooses to provide it to us. We pledge to use personal data we collect only for the purpose for which it was originally collected and not for any other purpose. It is especially important to us to ensure there is no lack of clarity around the collection of personal data and that you know from the start how, why and by whom the data has been collected. Besic may use your personal data for Besic's own marketing purposes. This may include providing you with information targeted to your interests. We



will give you the opportunity to elect not to receive direct marketing materials from us. Besì does not sell any personal data.

We also process data that we have rightfully obtained from credit reference agencies and from publicly accessible sources (e.g. company registers and the land registry).

The personal data we process may include the following:

**Prospective customer representative/contact person details:**

- First name, surname, address (address, postal code and town)
- Contact details (email address, telephone number)

**Existing customer/supplier representative/contact person details:**

- Customer/supplier name (first name and surname)
- Contact details (address, email address, telephone number)
- Bank details (bank account numbers)

**Jobs applicant**

- Personal data you provide, such as your name, address, date of birth, introductory letter, CV and education details
- Correspondence details, such as your postal address, email address and telephone number

**Bidder details:**

- Personal data provided to us by you or the prospective agent/business partner or supplier, such as your name, address, date of birth, introductory letter, CV
- Correspondence details, such as your postal address, email address and telephone number

Regardless of what personal data is concerned, we guarantee that we will only use it for the purposes stated under paragraph 4 below. The transparency of this approach is especially important to us to ensure there is no lack of clarity around collection and that you know from the start how, why and by whom the data has been collected.

**4. How we use personal data, our purpose for the processing of personal data and our legal basis for the processing of personal data**

We process your personal data in accordance with the provisions of the European General Data Protection Regulation (GDPR) and local data protection laws. As a rule, we seek to present the collection and processing of your data as transparently as possible. Therefore, we will only process your personal data where we have a lawful basis to do so under Article 6 of the GDPR or any other applicable lawful basis.

We have set out our purposes for processing personal data in the table below alongside the lawful basis we are relying on to process that personal data for the purpose:



**Besi**

<p><i>For purposes related to the provision of the products and services that we offer or use:</i></p>	
<ul style="list-style-type: none"> <li>• setting up, executing and managing contracts and business relationships;</li> <li>• to fulfil our contract with our customers and fulfil their orders (either through our webshop or otherwise) and implement pre-contractual measures;</li> <li>• managing enquiries and complaints or otherwise communicating with our customers/suppliers;</li> <li>• processing and responding to queries made through the contact form on our Company homepage.</li> </ul>	<p>We process your personal data in this way as it is necessary to execute a contract with our customer/supplier. We may also process your personal data because we have a legitimate interest.</p>
<p><i>For advertising and marketing purposes, including to measure how effective our marketing is:</i></p>	
<ul style="list-style-type: none"> <li>• we undertake direct marketing to existing customers to strengthen our relationship;</li> <li>• in a business to business context only, we will undertake direct marketing to build new customer relations or approach prospective customers.</li> </ul>	<p>We process your personal data based on a legitimate interest when:</p> <ul style="list-style-type: none"> <li>• you already have purchased our products or services,</li> <li>• the direct marketing/advertisement relates to similar products/services with regard to your prior purchase,</li> <li>• we have clearly informed you during your prior purchase that you might receive advertisements or be subject to direct marketing; and/or</li> <li>• you have had the opportunity to object against to being subjected to direct marketing.</li> </ul> <p>In other cases, we ask you for consent when processing your personal data for advertising and direct marketing purposes.</p>
<p><i>For administrative and internal business purposes:</i></p>	
<ul style="list-style-type: none"> <li>• accounting purposes and processing general payments as part of various projects;</li> <li>• transferring data across our corporate group to ensure we are offering an efficient service to our customers;</li> <li>• the development, deployment and protection of new IT solutions;</li> <li>• for other internal business purposes, such as analyzing and managing our businesses, audits, developing new products or services, enhancing our site, and improving our services and products;</li> <li>• to improve the user-friendliness of our service facilities such as the Besi web presence.</li> </ul>	<p>It is in our legitimate interests as a business to use your personal data for these purposes. For example, we have a clear interest in ensuring that our products and services are of high quality and efficient. We can also be legally obliged to process your personal data, such as for tax purposes. In these cases the legal obligation will serve as the legal ground for the processing.</p>



<i>For security and legal and compliance purposes:</i>	
<ul style="list-style-type: none"> <li>• as part of our efforts to keep our site safe and secure;</li> <li>• to detect or prevent fraud or other illegal activity;</li> <li>• as we believe to be necessary or appropriate in each case in order to comply with laws or legal process (including laws or legal process in other countries);</li> <li>• to protect our rights or property (or the rights or property of others) and to enforce our rights and pursue available remedies; and</li> <li>• we use video surveillance on our premises to protect our employees, the security of Besic property and the prevention, containment and solving of criminal conduct.</li> </ul>	<p>In some cases, we will need to use your personal data to fulfil a legal obligation (for example, if we receive a legitimate request from law enforcement agencies). In other cases (such as the detection of fraud or ensuring the security of the site) we will rely on our legitimate interests as a business to process your personal data for these purposes.</p>
<i>For recruitment purposes:</i>	
<ul style="list-style-type: none"> <li>• to contact you and inform you of the course of the application procedure, and to answer your questions;</li> <li>• to evaluate your application, your experience, abilities, qualifications, interest, assess your suitability for the vacancy, and interview you;</li> <li>• to maintain the records concerning our recruitment and selection process.</li> </ul>	<p>It is in our legitimate interests as a business to process your personal data for these purposes in order to organize our recruitment and selection process in a responsible, effective and efficient way.</p>

In general, we will only use your personal data for the purpose it was collected for. Should this purpose expire we will either securely delete the personal data or we will consider whether there is a compatible purpose and corresponding lawful basis to continue to process and store the personal data.

## 5. Disclosure of data and transmission

We will only share personal data with third parties if we have a lawful basis for doing so, for example where there is a statutory obligation, it is necessary in order to perform our contract with a customer or a supplier, it is necessary to pursue our legitimate interests or if you have given prior consent.

### **Within Besic and its subsidiaries**

We are part of a group of companies that share various operations and business processes. We may share your personal data with any member of our group, for example in order to fulfil our contractual obligations to you or because we have legitimate interests to do so.



### **With third party processors**

We use third party processors to help us with specific functions, and we may disclose your personal data to them if they need it to perform their respective services. All processors are contractually obliged to handle your data confidentially and only process it as part of the agreed service provision. We only provide third party agents with the minimum amount of information needed to complete the requested service or transaction.

### **In relation to statutory functions**

We may share your personal data where there is a statutory obligation to do so, for example with authorities, regulators, or even to the Courts in connection with legal proceedings. In particular, personal data collected through our video surveillance may be transmitted (in individual cases and only where it is strictly necessary and proportionate to do so) to competent authorities (for evidence protection in civil or criminal proceedings), security agencies (for security purposes), insurers (only for processing insurance claims), lawyers and those in other posts for the purpose of law enforcement.

### **With external advisors**

We may also share your personal data with our professional external advisors (e.g. legal, financial, business, risk management or other advisors), bankers and auditors if this is necessary in accordance with the purposes of processing.

### **With trading partners**

During the course of completing a transaction initiated by you, Besi may provide your contact or other relevant information to a trading partner in order to complete such transaction.

### **Data processed outside of the European Economic Area ("EEA")**

The third parties receiving or accessing your data might be located outside the EEA. When transferring data for which we are responsible to countries outside of the EEA (so-called 'third countries') without an adequate level of protection of personal data, we ensure 'appropriate safeguards'. More specifically, we contractually bind recipients of Personal Data to protect your data using the Standard Contractual Clauses (SCCs) as approved by the European Commission. We will assess in advance (where necessary, with the help of the recipients in third countries) on a case-by-case basis if the law or practice of the third country diminishes the effectiveness of the SCCs. In those cases, we will implement supplementary measures that fill the gaps in the protection and bring it up to the level required under applicable law.

## **6. Data retention period**

We process your personal data, where necessary, for the period of the entire business relationship (from the initiation and processing of a contract to its termination) and furthermore pursuant to the respective statutory retention and documentation obligations where applicable. We aim to process your personal data for the shortest possible period of time.



With regard to our recruitment activities, we will keep your personal data until four weeks after the completion of the application procedure if your application is not successful. We might ask your permission to store your personal data for another year after the application procedure, so we can notify you of other vacancies. If you give us permission to store your personal data longer, you have the right to withdraw this permission at any time which withdrawal does not affect the lawfulness of processing before you withdraw your consent.

Where we are relying on your consent to process your personal data, your personal data will be deleted if you withdraw your consent to the data being processed for that particular purpose if there is no other lawful basis for processing.

## **7. Data access and data security**

Data protection and data security are important to us. We have implemented technical and organizational measures to secure our data processing. These measures protect against unauthorized or unlawful processing, accidental loss, accidental destruction or accidental damage. This particularly concerns protection of your personal data. Protective measures are including but not limited to the use of modern security software and encryption methods, controls on physical access, authorization concepts, pseudonymization and other precautions to protect against and prevent external and internal attacks.

All technical and organizational security measures are continuously reviewed in line with technological development. IT security controls and security logs are reviewed at regular intervals to uncover malicious activities and potential threats, if any.

## **8. Your rights as the data subject**

As a data subject, you have a number of rights which we have set out below.

### **Right of access**

You have the right to information on whether or not we process your personal data and, if so, information about your personal data and how this data is processed by us.

### **Right to rectification**

If the personal data we hold about you is inaccurate or incomplete, please inform us of this so that we can rectify and/or complete it immediately.

### **Right to restrict processing**

You can restrict the processing of your data at our Company in certain circumstances.

### **Right to deletion of your data**

Should you no longer wish us to process your data, please contact us using the details set out above. We will delete your data if we are required and permitted to do so under applicable laws and will inform you when this has been completed. Should compelling reasons, in particular legal reasons, prevent us from deleting it, you will be informed by us to that effect without undue delay.

**Right to data portability**

In certain circumstances, you have the right to receive your personal data in a structured, current and machine-readable format.

**Right to object**

You have the right to object to processing of your personal data, on grounds related to your particular situation, where such processing is based on legitimate interests. This also applies if we use your personal data for any profiling activities based on that lawful basis.

In such a case, we will no longer process your personal data unless we are able to establish compelling legitimate grounds for such processing that outweigh your interests, rights and freedoms or processing is directed at the assertion, exercise or defense of legal claims.

Where direct marketing is concerned, you have the right to object to processing for the purposes of such marketing at any time. This also applies for profiling, if it is associated with direct marketing.

**Right to lodge a complaint**

If it is your view that we are in breach of local or European data protection law when processing your data, we would ask you to contact us so that we can answer any questions. You have the right to appeal to your local competent data processing authority.

To exercise your rights and if you have any queries, contact our data protection coordinator:

Data Protection Coordinator  
BE Semiconductor Industries N.V.  
Ratio 6  
6921 RW Duiven, the Netherlands  
[dataprotection@besi.com](mailto:dataprotection@besi.com)

Where appropriate it may be necessary for you to prove your identity to us in a suitable form before we are able to comply with your request, we do this to remove the possibility of unauthorized third parties being given your personal data and/or to prevent unauthorized changes and/or deletions being made. On receipt of a request from you exercising your rights, we shall respond without undue delay, but no later than one month from your concern reaching us.



### **How to make a request**

You can send your request to us in one of three ways:

- by letter, personally signed and with a copy of your ID send to:

Data Protection Coordinator  
BE Semiconductor Industries N.V.  
Ratio 6  
6921 RW Duiven, the Netherlands;

- personally, at the Beside company sites during office hours
- by email, only with a qualified electronic signature, to: [dataprotection@beside.com](mailto:dataprotection@beside.com)

Please make your concern as specific as possible so that we can deal with it quickly and efficiently. An appropriate enquiry form is available from us.

## **9. Use of the Beside website**

Beside websites record a range of data and information about visitors to the websites automatically. This general data and information is stored in the server's logs files. The following are the potential information that could be recorded:

- (1) the browser types and versions used,
- (2) the operating system used by the accessing system,
- (3) the website from which an accessing system gets to our system (so-called referrer),
- (4) the sub-websites heading for our website via an accessing system,
- (5) the date and time of access to the website,
- (6) an internet protocol address (IP address),
- (7) the internet service provider of the accessing system and
- (8) other similar data and information designed to avert risks in the event of access to our information technology systems.

We rely on your consent and/or our legitimate interests to process this data in order to manage and improve our website and ensure we are supporting our customers and prospective customers in the most helpful way.

In using this general data and information, we draw no conclusions about the data subject. This information is needed rather in order to:

- (1) correctly deliver the content of our website,
- (2) optimize the content of our website and the advertising for it,
- (3) guarantee the long-term functionality of our information technology systems and of our website's technology, and
- (4) provide law enforcement authorities with the information necessary for prosecution in the event of a cyber-attack.



This collected data and information is therefore statistical and is assessed with a view to increasing data protection and data security in our Company. The anonymous data in the server log files is stored separately from all personal data provided by a data subject.

## 10. Cookies

A cookie is a data file that – provided your browser settings allow – is stored by us on your computer if you visit our website or perform certain actions. The cookie contains information that we have sent to your computer. It stores certain settings and data for interaction with our system via your browser.

We use so-called session cookies, which are stored during your visit to our website. They are deleted when you end your browser session. We also use permanent cookies, which remain on your computer once a browser session has ended. Permanent cookies contain an identification number by which we can identify your computer. With this, we can improve our services if you visit our websites repeatedly. We cannot assign personal data to this identification number.

If you do not wish to use cookies, please set cookie handling in your browser's security settings accordingly. You will find setting options in the most current browsers in the „Extras“ menu under „Settings“ or „Internet Options“ and the tab „Data Protection“. With these settings you can also delete cookies already set.

Please note that certain cookies are necessary to ensure the basic functions of the website and cannot be rejected ('strictly necessary cookies'). With respect to other cookies for which we ask your consent on the website, please note that some pages of our website may not function properly if you do not accept such cookies. Below you will also learn how to prevent certain cookies being set.

With regard to our cookies, it is up to you when you want to delete them. In any case, they are stored in your browser until you decide to delete them. As a user, you also have full control over the use of the cookies. However, we should like to advise you at this point that if you deactivate cookies it may not be possible to use all functions of our website.

## 11. Google Analytics

Our website uses Google Analytics, a web analysis service from Google Inc. ("Google"). Google Analytics is operated by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Google Analytics uses cookies (text files stored on your computer enabling analysis of your website usage, see above). Information generated by the cookie (including your IP address) is transferred to a Google server in the USA and stored there.

Google will use this information to assess your website usage (e.g. search terms entered), compile reports on website activity for the website operator and provide other services associated with website and internet use. Google can transfer this information to third parties where appropriate if this is legally prescribed or if third parties process



this data on behalf of Google. Google will never associate your IP address with other data from Google.

The life of the cookies set by Google Analytics is 30 seconds to 2 years. You will find further details here on the cookies set:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

To protect your data, we have added the Code “anonymizelp” to Google Analytics on this website.

The relationship with Google Analytics and the transfer of personal data is based on the most recent Standard Contractual Clauses as approved by the European Commission. You can find further information on Google Analytics terms of use and data protection at

<https://marketingplatform.google.com/about/analytics/terms/nl/>

<https://www.google.nl/intl/nl/policies/>

You can prevent the installation of cookies by setting your browser software accordingly. We would point out that deactivating cookies may restrict your website functionality.

## **12. Updating this statement**

Besì may update and amend this document from time to time. For example, to reflect amendments to the national data protection laws or the EU General Data Protection Regulation. Declaration with the latest updates will always be posted on this website (<https://www.besi.com/>). Please consult the website to review any updates and always read our most recent Privacy Statement before providing any personal data to us.