



EMPLOYEE PRIVACY NOTICE

SUMMARY NOTICE ON EMPLOYEE DATA PROCESSING

We, as the REG entity, with which you have your employment contract (hereafter "we", "REG", "us", "our") provide you with this summary notice of the accompanying, detailed employee privacy notice below (hereafter "Full Notice"). With these privacy notices, we would like to give you an overview of our practices as a data controller with respect to any kind of processing (such as the collection, storage, use, disclosure or erasure) of information of any kind (e.g., your name, address, salary, performance, certain health information etc.) related to you (hereafter jointly "Personal Data") in connection with your work for us. You can review the Full Notice and a list of all defined terms with more details on their respective meanings below or by clicking [here](#).

Scope of applicability

This summary notice applies to you if you are a current or former full or part-time employee of REG.

Processing of your Personal Data (categories of Personal Data)

We process the following of your Personal Data collected during the application and job interview process and in the course of your employment from yourself, your supervisor or authorized third parties (i.e. recruitment agencies and public authorities): e.g. your name and other identification data, bank account details, information related to your job, health-related information, salary and benefits, equity compensation, your use of company equipment and resources, your communications and their content, your work performance, disciplinary actions taken against you. For more details see I. of the Full Notice or click [here](#).

Processing purposes

We process Your Personal Data for the following purposes: administration of your employment relationship, providing payments and applicable benefits, managing your daily job activities, compliance with applicable laws and regulations as well as REG policies and procedures, monitoring your job performance, security and fraud prevention, compliance with corporate financial responsibilities, audit requirements, cost and budgeting analysis and controls. For more details, see II. of the Full Notice or click [here](#).

Legal justifications for the processing of your Personal Data

One of the key privacy law requirements is that any processing of Personal Data has to have a legal justification. We generally use the following legal justifications: the processing is necessary for (i) the performance of the employment contract, (ii) compliance with a legal obligation, (iii) realizing a legitimate interest of us or a third party. For more details and the matching of purposes and corresponding legal justifications see III. of the Full Notice or click [here](#).

Data transfers and recipients and legal justification for such transfers

We transfer your Personal Data to other REG group companies and third parties (e.g. business partners, customers, benefits providers), certain acquiring or acquired entities, our service providers, and, in accordance with applicable law, governmental authorities, courts, external advisors, and similar third parties, some of the aforementioned recipients located in jurisdictions outside the EU. For more details see IV. of the Full Notice or click [here](#).

Retention periods for and deletion of your Personal Data

Your Personal Data will be deleted once they are no longer needed for the purposes motivating their original collection or as required by applicable law. For more details see V. of the Full Notice or click [here](#).

Your statutory rights

You have a number of rights with regard to the processing or your Personal Data, each as per the conditions defined in applicable law, such as the right to get access to your data, to get them corrected, erased or handed over. Please refer any of your questions to dataprivacy@regi.com. For more details, see VI. of the Full Notice or click [here](#).

Changes of this summary and the Full Notice as well as further notices

Both this summary and the Full Notice are subject to change. You will be notified adequately of any such changes. Further, you will be notified adequately through further relevant privacy notices (e.g. for specific purposes, systems used by REG) in case such is not covered by this summary and the Full Notice.

How to contact us

If you wish to exercise your data subject rights or if you have any other questions concerning this Notice, please address your request to REG via dataprivacy@regi.com.

FULL NOTICE ON EMPLOYEE DATA PROCESSING

I. Categories of Personal Data

Renewable Energy Group, Inc. and its affiliates (collectively "REG", including references to "we", "us" and "our") collect the majority of the Personal Data below directly from their employees with the exception of some categories of Personal Data which REG generates, including, e.g. appraisals and absence records. We process the following Employee Data about you:

Master data, such as your name and surname, gender, marital/civil partnership status, date of birth, citizenship and other identification data (including photographs to the extent permitted by applicable law);

Social Security and Banking data, such as national or social insurance number (e.g., government identification number, identity type and/or citizen service number) to the extent permitted by applicable law and bank account details;

Contact details, such as your work and home addresses, telephone numbers, email addresses, and emergency contact details;

Family Member/Dependent data (only if provided voluntarily) relevant for emergency contacts and/or benefit payments to Dependents;

Organizational data, such as job title and code, work location, division, department, position level, employment contract, assigned tasks and projects, manager's name, business travel data, ethics and compliance training data, start and end date, and reason for leaving;

Information about salary and benefits, such as your basic salary, bonus and commission entitlements, insurance benefits (including information about you and your dependents that REG provides to the insurer), tax code, accrued salary information, and information relating to your pension;

Information about equity compensation, such as units of stock or directorships held, details of all restricted stock units or any other entitlement to shares of stock awarded, cancelled, exercised, vested, unvested or outstanding in your favor;

Travel data, such as passport, visa, work permit, nationality, ethnicity (following from identification documents, e.g. a passport or visa), itinerary information and residency data;

Contract data, such as employment contract data, working time and leave entitlements, salary and related compensation/benefits data (salary period, holiday/vacation pay and holiday/vacation pay period, pay scale area and type, salary grade and any salary-related changes), hours worked per week, hire date, contract length, departure date (where applicable);

Workforce administration data, such as employee mobility, holiday, leave, absence, workplace safety, succession and assignment planning data, and employee satisfaction and other surveys, including personality and leadership assessments;

Monitoring data, such as CCTV recordings for security reasons in production facilities and information related to the use of company equipment (e.g. computers and laptops), (software) systems, and other resources;

Communication data, such as email content, business letter content, business documents, and chat content;

Performance and Disciplinary information, such as performance reviews, evaluations and ratings, information about disciplinary allegations, the disciplinary process and any disciplinary warnings, details of grievances, and any outcome;

Employment and Training history, such as data regarding previous work experience (including references from previous employers), resumes, qualifications and work history, vocational training, conference and seminars, educational background, background check data (in accordance with and where permitted or required by applicable local law), and reports from executive search or employment firms (where applicable);

Hotline, Internal Reporting and Internal Investigation data, such as data concerning reported wrongdoings and company risks and the measures to address such concerns.

In addition, we process the following "Sensitive Employee Data" about you:

Medical/Health data (including number of sick days) for purposes of administering and providing compensation, administering the workforce (e.g., workforce planning and accommodating the work place), and compliance with applicable laws and employment-related requirements (e.g., support of re-integration activities and statutory wage tracking);

Information on work-related accidents for purposes of administering and providing compensation (e.g., insurance compensation), and compliance with applicable laws and employment-related requirements (e.g., work safety, reporting obligations);

Information on disability (only if provided voluntarily) for purposes of administering the workforce (e.g., accommodating the work place) and compliance with applicable laws and employment-related requirements;

Information on maternity leave for purposes of administering the workforce (e.g., workforce planning), and compliance with applicable laws and employment-related requirements;

Information on religious belief of employees of German REG entities for church tax purposes in Germany.

All Personal Data you provide to REG or that we (automatically) collect is voluntarily provided. However, without providing certain data, for instance your email address, we may not be able to respond to your request and/or perform a contract relating to you.

II. Processing purposes and legal basis

Sensitive Employee Data is collected, processed, and used for the purposes and based on the legal bases mentioned in I. above, and other Employee Data is collected, processed, and used for the following purposes and legal bases.

Processing Purposes	Categories of Personal Data Involved	Legal basis
Compensation- and benefit-related Purposes	<ul style="list-style-type: none"> • Master data; • Social Security and Banking data; • Contact details; • Information on religious belief (only applicable to Germany, see above); • Information about salary and benefits; • Information about equity compensation; • Travel data; • Contract data; • Workforce administration data; • Performance and Disciplinary information. 	<ul style="list-style-type: none"> • Necessity to perform the relevant employment contract and contracts related to the employment (such as travel- and other work- related contracts for employees).
Regulatory-related Purposes, including mandatory reporting Purposes	<ul style="list-style-type: none"> • Master data; • Social Security and Banking data; • Contact details; • Organizational data; • Information on religious belief (only applicable to Germany, see above); • Information on salary and benefits; • Travel data; • Contract data; • Communication data; • Performance and Disciplinary information; • Hotline, Internal Reporting and Internal Investigation data. 	<ul style="list-style-type: none"> • Necessity to comply with legal obligation (such as tax-related, financial and/or other local law/regulatory reporting obligations).
Communication-related Purposes	<ul style="list-style-type: none"> • Master data; • Contact details; • Communication data. 	<ul style="list-style-type: none"> • Legitimate interest to communicate with employees regarding work-related items.
Employment performance, talent management and career development related purposes	<ul style="list-style-type: none"> • Master data; • Contact details; • Organizational data; • Information about salary and benefits; • Information about equity compensation; • Travel data; • Contract data; • Workforce administration data; • Communication data; • Performance and Disciplinary information; • Employment and Training History. 	<ul style="list-style-type: none"> • Legitimate interest to properly administer employee-related data that is not strictly necessary for contract performance but for proper business and employment administration.
Emergency Contact-related Purposes	<ul style="list-style-type: none"> • Master data; • Contact details; • Family Member/Dependent data (only if provided voluntarily). 	<ul style="list-style-type: none"> • Legitimate Interest to ensure that for a case of emergency relevant persons can be contacted; or in case of urgency the processing is necessary to protect the vital interests of the employee or of another natural person.

III. Personal Data of your Dependents

If you provide REG with Personal Data about your spouse, domestic civil/partner, and/or dependents (e.g., for emergency contact or benefits related purposes) ("**Dependents**"), please make sure to inform them accordingly before any processing occurring, including about their rights with respect to our processing of their Personal Data (see VI. below) and that you may disclose their Personal Data to REG for these purposes. You should also obtain the consent of these individuals if such consent is required by applicable local law for processing their Personal Data.

IV. Data transfers and recipients and legal justification for such transfers

1. Recipients

We may transfer Employee Data to third parties for the processing purposes included in this Notice as follows:

Within the REG group of companies: parent entity, being Renewable Energy Group, Inc., and each of its affiliates and subsidiaries may receive Employee Data or Sensitive Employee Data to the extent necessary for the processing purposes (as set out above under II. and I. in more detail) with applicable company procedures and respond to and comply with requests and legal demands. See Section 2 of this Full Notice for cross-border data transfers.

With certain third parties: To the extent necessary for commercial contracts and transactions Business partners, suppliers, customers and end-customers may receive your corporate contact details and relevant information about your function at REG. In addition, relevant authorities (such as tax authorities), independent external advisors, auditors, insurance carriers, benefits providers, and other third parties may receive relevant information related to you as necessary in connection with REG's business operations, in particular to administer and provide compensation, administer and provide applicable benefits and other work-related allowances, administer the workforce, comply with applicable laws and employment-related requirements, communicate with you and third parties, and respond to and comply with requests and legal demands.

With certain entities involved in a (potential) acquisition: If the company business for which you work is sold or transferred in whole or in part or if the REG group of companies is acquiring and integrating another entity into the company business for which you work (or any similar transaction is being contemplated), your Employee Data may be transferred to the other entity (e.g. the (potential) new employer or (potentially to be) acquired entity) prior to the transaction (e.g. during the diligence phase) or after the transaction, subject to any rights provided by applicable local law.

When required (and allowed for by local law) to process Sensitive Employee Data, then this information will only be transferred outside of your country if permitted by applicable law.

2. Cross-Border Data Transfers

We place great importance on the security of all information associated with you and are committed to protecting the security of your personal data. We deploy appropriate administrative, technical, and physical safeguards designed to safeguard the information that we collect taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for your rights and freedoms.

However, please note in general that no information system can be 100% secure and therefore we cannot guarantee the absolute security of your personal data. Moreover, we are not responsible for the security of information you transmit to us over networks that we do not control, including the Internet and wireless networks.

We transfer your Employee Data outside of the country in which you are located for employment- or business-related administrative purposes (as set out in more detail above under II.). Some recipients of your Employee Data are located in a country located outside the European Economic Area ("EEA") for which the European Commission has not issued a decision that this country ensures an adequate level of data protection, e.g. in certain locations of the REG group outside the EEA (such as in the U.S.) and certain third-party recipients (as described above under IV.1) outside the EEA.

Some recipients located outside the EEA are certified under the EU-U.S. Privacy Shield and others may be located in countries for which the European Commission has issued adequacy decisions. In each case, the transfer is thereby recognized as providing an adequate level of data protection from a European data protection law perspective.

Where necessary we establish (e.g. by implementing Standard Contractual Clauses) that recipients of Employee Data located outside the EEA provide an adequate level of data protection for the Employee Data and that appropriate technical and organizational security measures are in place to protect Employee Data. For more information, please contact us at dataprivacy@regi.com.

V. Retention periods for and deletion of your Employee Data

Employee Data processed for the purposes hereunder will be stored to the extent necessary and permitted under applicable local law:

- during the term of your employment relationship with REG,
- during a transition period (e.g. for the provision of ongoing pensions and other benefits),
- for a term required by applicable laws (such as tax laws which usually require a retention period between 7 and 10 years), and/or
- until the end of a dispute and/or (potential) legal action/proceeding, including any potential periods for appeal in order to manage, exercise or defend against legal claims that are not barred by the applicable statute of limitations.

Afterwards, we will remove your Employee Data from our systems to the extent possible and/or take steps to properly anonymize it so that you can no longer be identified from it.

VI. Your statutory rights

Where we process your personal data on the basis of our or a third party's legitimate interest, you may object to such processing at any time by contact us at the address below. Upon your objection, we shall no longer process your personal data, unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or if the processing is needed for the establishment, exercise or defence of legal claims. We do not use your personal data to make solely automated decisions which affect you legally or similarly.

REG encourages you to contact us to update or correct your information if it changes or if you believe that any information that REG has collected about you is inaccurate. You can also ask us to see what personal data we hold about you, to rectify or erase your personal data, or to port your personal data and you may tell us if you object to or want to restrict our use of your personal data. If you would like to discuss or exercise such rights, please notify dataprivacy@regi.com. You can also use this address to lodge a complaint. If you are not satisfied about the manner in which REG handles your complaint, you may also lodge a complaint with the competent data protection authority.

For information about the choices you may have in regard to our use of cookies, please click [here](#).

The foregoing rights also apply for Family Members/Dependents. Please note that the aforementioned rights might be limited under the applicable national data protection law. REG as your contractual employer remains the universal point of contact for your execution of these rights. Please refer any of your questions to dataprivacy@regi.com.

Our US address:

Renewable Energy Group, Inc.
416 S. Bell Ave.
PO Box 888
Ames IA 50010, US

In the alternative, please contact the address of your local REG employing entity.

REG is entitled to amend this Notice unilaterally. Amendments will be communicated internally. If you are uncertain whether you are consulting the most recent version of this Notice, please refer to dataprivacy@regi.com for further information.