

Tenneco Privacy Notice – Ethics and Compliance Hotline

Thank you for visiting Tenneco's Ethics and Compliance Hotline ("Hotline"), a Speak Up web service provided by Navex. The Hotline allows you to ask questions and report misconduct, violations of law or alleged breaches of Tenneco's Code of Conduct and policies. Use of the Hotline is entirely voluntary.

Navex serves as a processor of data on behalf of Tenneco Inc. and its subsidiaries (herein after referred to as "Tenneco", "we", "us", or "our"), who are responsible (as "controller") for the processing of personal data by means of the Hotline.

Your Privacy is important to us. We want you to feel safe while using our Hotline and ask you to read and acknowledge this Privacy Notice concerning the collection of personal data and your rights. You have other means to speak up and ask questions or raise concerns. You can talk to your manager or another manager you trust, Human Resources, the Law Department, or the Global Compliance Team.

1. What are the purposes for processing personal data

Personal data are processed in the context of the Hotline for the purpose of an initial reporting and investigation of questions and reports of alleged breaches of Tenneco's Code of Conduct, violation of Tenneco's policies, or violation of law. Personal data are also processed during the review and investigation of reports, and the reporting of the relevant outcome of any investigation to the management team.

2. Confidentiality

Tenneco and its investigators are committed to maintaining confidentiality of reports, identities, facts, data, and information gathered through the reporting and investigation process to the extent permitted by applicable laws. Our investigations include processing of information you provide in order to substantiate and assess the details and facts about the reported incident. This in return will give us the opportunity to respond to your report and to define the remediation measures that improve our internal processes and avoid similar situations in the future. In certain cases, we are obligated under data protection laws to inform the accused of the allegations made against them.

3. What are the legal bases for processing personal data

We rely on one or more of the following legal bases to process personal data within the context of the Hotline and reporting process:

- Necessary to comply with a legal obligation in jurisdictions where whistleblowing platforms are mandatory;
- Tenneco's legitimate business interests particularly to monitor compliance with our Code of Conduct, processes and policies; or
- When we have your free, informed, specific and unambiguous consent to process your personal data for certain purposes consistent with the whistleblowing process.

4. Which categories of personal data do we process

We follow the principle of data minimization and will only process personal data that are necessary for the purposes described above. We may process the following personal data for the purposes mentioned in this Privacy Notice:

- Reporter identity (optional), location, relationship with Tenneco and contact details;
- Reported facts about any suspected breach or violations;
- Identity, job position/title and contact details of the individual(s) mentioned in a report;
- Identity, job position/title and contact details of the individuals involved in the receipt or processing of a report;
- Information obtained during an investigation of reported facts;
- Report of any investigative actions;
- Outcome of a report;
- Report key number to your report;
- Any optional information that you record about yourself.

5. How do we collect your personal data

The Hotline and reporting process allow for personal data from various data subjects to be collected and processed. We may obtain personal data about a person making a report, a person mentioned in a report, a person investigating a report or a person serving as a witness in an investigation. These personal data are obtained directly through the Hotline, when you report to us outside the Hotline, and/or when we initiate investigation into a report.

6. Information of the individual(s) mentioned in the report

Where applicable laws permit, an individual mentioned in a report is entitled to be informed about the processing of their personal data. When the individual is notified of a report, they may object to the processing of their personal data to the extent permitted by laws applicable to the jurisdiction in question.

We may implement appropriate safeguards to protect personal data from being destroyed. The reported individual shall be entitled to know the facts alleged against them, privacy rights available, and recipients of any reports generated about them.

7. Who will have access to your personal data

Personal data collected in the context of a report made through the Hotline or reporting and investigation process may be processed by or communicated to the following parties:

- NAVEX, with address in the United States, at 5500 Meadows Road, Suite 500, Lake Oswego, OR, 97035, the independent third party who operates and manages the EthicsPoint platform where individuals can submit reports.
- Outside-service providers engaged to provide investigative support, including but not limited to law firms.
- Authorized Tenneco team members responsible for investigating reports and those on a strict need-to-know basis.



We reserve the right to disclose your personal data as required by law, or when we believe that disclosure is necessary to protect our rights and/or comply with a legal proceeding, court order, request from a regulator or any other legal process served on us.

8. International transfer of personal data

Any personal data collected and stored in the Hotline is hosted at Navex's data center, in the United States of America. Any personal data processed through the Hotline will be transferred to the United States of America. While investigating and managing reports, personal data may be transferred to recipients in countries located in other regions where Tenneco has operations.

For individuals within the EU, transfers among Tenneco entities are covered by the Intra-Group Data Processing and Transfer Agreement, which relies on the standard contractual clauses under the General Data Protection Regulation, adopted by the European Commission, which gives specific contractual protections designed to ensure that your personal data receives an adequate and consistent level of protection.

Tenneco has implemented appropriate safeguards when transferring personal data to recipients in locations outside the European Economic Area where the law does not provide the same level of data protection.

9. How long do we retain your personal data

Your personal data will be kept as long as necessary to process and investigate the report. Personal data may also be kept as long as necessary to initiate sanctions or to meet any legal or financial requirement(s). In the event a judicial or disciplinary proceeding is initiated, the personal data that is processed will be kept until those proceedings are definitively closed. Alternatively, personal data may be kept no longer than the statutory retention requirements under applicable law.

10. Security of your personal data

Both Tenneco and Navex are committed to protecting your privacy and comply with privacy laws and regulations. Navex provides the Hotline on behalf of Tenneco and has taken extensive measures to prevent the loss, misuse and alteration of your personal data. In addition, we have implemented appropriate technical and organizational measures to protect your data from unauthorized access, unlawful processing, accidental loss, destruction and damage. You may request a copy of our technical and organizational controls by writing to PrivacyOffice@Tenneco.com.

11. No automated decision-making

We do not make decisions, when managing reports, based solely on an automated processing of data that may affect the rights of individuals involved in a report.

12. Your rights

Depending on the applicable law of the country where you are located, you, the reporter, and anyone named in the report may have certain rights, which can be exercised in relation to the personal data we hold. If you make a request to exercise any of your rights, we reserve the right to ask you for a proof of your identity, where it is necessary to confirm your identity. In general, the reporter and persons named in the report have the following rights:

- ***Access, correction, deletion, restriction of processing and a right to object to the processing of your personal data***

If the right of objection is exercised, we will check to what extent the stored data is still required, especially for investigating a report. Data that is no longer required will be deleted.

- ***Right to withdraw consent***

If we relied on your consent, you have a right to withdraw that consent at any time. You may write to us at PrivacyOffice@Tenneco.com to communicate your withdrawal of consent. Withdrawal of consent will not affect the lawfulness of processing prior to the withdrawal.

- ***Right to Complain***

If you believe your personal data has been processed unlawfully or if you are not satisfied with our privacy practices, you have the right to lodge a complaint to our Privacy Office at PrivacyOffice@Tenneco.com or to the competent data protection supervisory authority.

For individuals within the European Union ("EU"), you may also use this Hotline to report conduct that violates EU member state laws pursuant to the EU Whistleblower Directive.

13. Changes to this Privacy Notice

We may modify this Privacy Notice from time to time. We will post the amended Notice on this Hotline and include the revision date to let you know that we have made changes to this Privacy Notice.

14. Contact Us

Please submit any questions, concerns or comments relating to this Privacy Notice, our handling of your personal data or to exercise any rights relating to your personal data to our Data Protection Officer at PrivacyOffice@Tenneco.com.

Address: Tenneco Privacy Office, 15701 Technology Drive in Northville, Michigan, 48168, USA

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