

EUROPEAN EMPLOYEE DATA PRIVACY SECURITY POLICY

OBJECTIVE - As a global employer, PPG Industries, Inc. ("PPG") needs to obtain, process, use, and transfer European employee personal data ("European personal data") in the U.S. and in other locations outside the European Economic Area ("Europe"). To maintain the flow of European personal data from Europe to the U.S., PPG complies with the U.S.- E.U. Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. The company has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view the company's certification, please visit <http://www.export.gov/safeharbor/>

This policy is intended to establish procedures to assure compliance with the safe harbor and to inform PPG users of their obligations when handling and using European personal data.

ADMINISTRATION - The PPG U.S. Data Administrator is responsible for:

- receiving and maintaining European personal data transferred from Europe,
- controlling initial data access and security,
- authorizing data uses and onward transfer of data outside PPG,
- working with PPG Europe personnel to:
 - inform them of ongoing data needs and uses,
 - coordinate U.S. activities and cooperation with investigations and inquiries,
 - maintain compliance as laws/regulation change
- informing U.S. PPG users of their obligations under the safe harbor, and
- representing PPG to the U.S. Department of Commerce in matters related to safe harbor participation.

USER ACCESS - To obtain access to the PPG Global Repository which contains European personal data, PPG users must complete and obtain managerial approval on the [HRP Application Access - Security Clearance Request](#). Completed requests must be submitted to the U.S. Data Administrator for authorization. All potential uses of the European personal data must be listed. Any future changes in the use of the European personal data must be pre-approved by the U.S. Data Administrator.

DATA REQUESTS - The U.S. Data Administrator must approve requests for reports and Global Repository access.

USER OBLIGATIONS - An explanation of the obligation of all PPG users of European personal data will be manually or electronically attached to all data sets and reports sent to users. The explanation and this policy will also be posted on the PPG HR/HRIS web page.

DATA LOG - The U.S. Data Administrator will maintain a log of all requests for data access and reports containing European personal data. The log will list dates, PPG user(s), authorized use of data, and other information to facilitate later complaint investigation and annual audits.

CHANGES IN DATA USE - The U.S. Data Administrator must be informed in advance of any change in the use of the European personal data to permit compliance with the employee notification requirements of the safe harbor. He or she will coordinate with PPG Europe HR to comply with safe harbor requirements.

ONWARD DATA TRANSFER TO THIRD PARTIES - PPG will not transfer European personal data to third parties outside of PPG for commercial consumer purposes. European personal data transfer outside of PPG will be limited to the purposes of benefits and compensation administration, manpower development and training; capital transaction and financial administration needs; as well as to comply with governmental regulatory and legal obligations. PPG will comply with safe harbor requirements in all transfers of European personal data outside the Company.

COMPLAINT INVESTIGATIONS - The U.S. Data Administrator will conduct internal investigations of complaints related to European personal data handling and will cooperate with PPG Europe and the European Data Authorities to resolve complaints.

ANNUAL AUDITS - The U.S. Data Administrator will conduct an annual audit of the procedures outlined in this policy to assure the full compliance has been maintained and will report in writing audit results, including all discrepancies found, to the PPG Vice President, Human Resources and to the Director, Human Resources, PPG Europe.