Privacy Statement for websites

Effective November 2022

Why do we have this Privacy Statement?

Nobian values the trust of our website visitors, existing and prospective business relations, which include Nobian's business customers, investors, business partners, resellers, suppliers and other relevant stakeholders ("**Professional Partner(s)**"). This Privacy Statement helps you understand why Nobian collects, processes and transfers your personal data, what categories of personal data may be collected, processed and transferred, and what rights you may have concerning your personal data.

Who is covered by this Statement?

This Privacy Statement describes how we process personal data if you:

- visit our website from which you are accessing this Privacy Statement;
- visit the customer portal operated by us, which allows you to find invoices and order related information, access product information and/or place orders (the "**My Nobian Portal**"); and/or
- are a Professional Partner

Which personal data do we process?

We process the following personal data.

Website visitors:

- your IP address and information regarding your browser or device. Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Mac), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version and the name and version of the services (such as the App) you are using.
- We may collect the physical location of your device by, for example, using your IP address, or satellite, cell phone tower or WiFi signals. We may use your device's physical location to analyze the traffic to and use of our services. In some instances, you may be permitted to allow or deny such uses and/or sharing of your device's location (e.g., through your App settings).
- If you fill in the contact form on our website we process your name, e-mail address, telephone number and your message.

Customers and business partners:

- Personal Details and Contact Information: (Business) name; address; e-mail; telephone and fax details and other contact information; signature and electronic signature; nationality; photograph; voice recordings and video; CVs received from vendors/subcontractor specialists for projects; distributor app, access/login data for My Nobian Portal, order details, details through our online contact form.
- Your use of apps. When you download and use a Nobian app, we and our service providers may track and collect app usage data, such as the date and time the app on your device accesses our servers and what information and files have been downloaded to the app based on your device number.

- Marketing Preferences and Customer Service Interactions: marketing preferences; entry in contests or promotions; responses to voluntary surveys; recordings of telephone calls with Nobian representatives.
  Our sites are protected by camera surveillance for your and our safety.

Are you obliged to provide us with your personal data?

We need to process your personal data in order to enable your use of the website and/or other services we provide. If you do not provide the information requested, you may not be able to use the website or our services.

Why do we process your personal data and what is the legal basis?

We process personal data for the following purposes and the following legal grounds.

- **Providing the functionality of the website (website visitors) and providing our services including dealing with your requests (customers and business partners)**.
  - To provide our services to you, such as allowing you to visit our website, place orders, view order status and invoices, and obtain additional product information.
  - To arrange access to your registered account and providing you with related services.
  - To respond to your inquiries and fulfill your requests, for example, when you send us questions, suggestions, compliments or complaints, or when you request information about our services.
  - To complete your orders, verify your information, and provide you with related service.
  - To send administrative information to you, such as changes to our terms, conditions, and policies.
  - Communicate with you for the purpose of our contractual relationship or legitimate interest. This includes:
    - Tracking and responding to your inquiries, reports, reviews or correspondence regarding products, projects and services.
    - Administering your account(s) with us.
    - Providing and improving our customer service.
    - Facilitating communications generally in the context of our business activities.
    - Sending administrative information to you, such as changes to our terms, conditions and policies.
    - Enforcing the contractual terms and conditions that govern our relationship with you.
  - Operate our business for the purpose of our contractual relationship or legitimate interest. This includes:
    - Providing you with our products, projects and services.
    - Assisting you to provide us with your products, projects and services.
    - Paying you for any goods or services that you provide us.
    - Managing product and service development.
    - Monitoring performance to review compliance with quality, health, safety, environment and security (QHSES) requirements
    - Managing and allocating company assets and resources.
    - Carrying out strategic planning and project management.
    - Compiling audit trails and other reporting tools.
    - Financial management, budgeting and reporting.

    - Managing our disaster recovery and business continuity plans and procedures.
    - Maintaining our records relating to manufacturing and other business activities.
    - Operating and managing our IT and communications systems.
    - Carrying out data analysis, audits, and identifying usage trends.
  - Provide personalized services and information of interest to you with your consent, or where we have a legitimate interest. This includes:
    - Better understanding you and personalizing our interactions with you.
    - Marketing our products, projects and services.
    - Analyzing and predicting your preferences in order to improve our interactions with you, and to deliver information that we believe will be relevant to your professional interests.

    Engage with you as a Professional Partner. This includes:
    - Involving you in programs/panels of professionals.
    - Reaching out to you for your professional expertise, for example, in the context of surveys relating to our products, projects or services.
    - Collaborating with you on events, publications, or advisory meetings.
    - Seeking your views on products, projects and services promoted by Nobian, and our business partners for development and improvement purposes.
  - Inviting you to participate in special programs, activities, contests, events, or promotions. Some of these may have additional rules containing information about how we will use and disclose your personal data.

  The legal grounds of these activities are: our legitimate interests (proper functioning of our website, proper functioning of our organization, marketing), performance of a contract and legal obligation.

- **Providing you with our newsletter and/or other marketing materials.** To send you marketing related emails, with information about our services, new products and other news about our company.

  We will engage in this activity with your consent or where we have a legitimate interest. You can always opt out for our newsletters.

- **Analyzing personal data for business reporting and providing personalized services.**
  - To analyze or predict our users' preferences in order to prepare aggregated trend reports on how our digital content is used, so we can improve our services.
  - To better understand your interests and preferences, so that we can personalize our interactions with you and provide you with information and/or offers tailored to your interests.
  - To better understand your preferences so that we can deliver content via our services that we believe will be relevant and interesting to you.

  We will provide personalized services based on our legitimate interests, and with your consent to the extent required by applicable law.

- **Accomplishing our business purposes.**
  - For data analysis, for example, to improve the efficiency of our services;
  - For audits, to verify that our internal processes function as intended and to address legal, regulatory, or contractual requirements;

- For fraud and security monitoring purposes, for example, to detect and prevent cyberattacks or attempts to commit identity theft;
- For developing new products and services;
- For enhancing, improving, repairing, maintaining, or modifying our current products and services, as well as undertaking quality and safety assurance measures;
- For identifying usage trends, for example, understanding which parts of our services are of most interest to users; and
- For operating and expanding our business activities, for example, understanding which parts of our services are of most interest to our users so we can focus our energies on meeting our users' interests.

We engage in these activities to manage our contractual relationship with you, to comply with a legal obligation, and/or to take care of our legitimate interests:

- Meeting our regulatory monitoring, recordkeeping and reporting obligations.
- Conducting audits.
- Detecting, preventing and investigating fraud, including carrying out background checks, due diligence and know your customer checks.
- Identifying potential conflicts of interest.
- Complying with sanction rules and anti-corruption, anti-bribery, and transparency obligations.
- Responding to legal processes such as subpoenas, pursuing legal rights and remedies, and defending litigation.
- Conducting internal investigations, managing internal complaints or claims, and complying with internal policies or procedures.

We may aggregate the personal data that you provide us.

Do we disclose your personal data to other organizations?

We disclose your personal data:

- **To our affiliates in the EU for the purposes described in this Privacy Statement.**
- **To our third-party service providers, to facilitate services they provide to us.**
  These can include providers of services such as website hosting, data analysis, payment processing, order fulfillment, information technology and related infrastructure provision, customer service, email delivery, auditing, co- promotional partners for products, projects and services we jointly develop and/or market etc.
- **To our accountants, lawyers and tax advisers**
  To comply with laws and regulations and to enforce laws, regulations, our contracts and general terms of service, to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.
- **Third party payment service**
  We may use a third-party payment service to process payments made through the services. If you wish to make a payment through our services, your personal data will be collected by such third party and not by us, and will be subject to the third party's privacy statement, rather than this Privacy Statement. We have no control over, and are not responsible for, this third party's collection, use, and disclosure of your personal data.
- **To public and government authorities.**
  If necessary for law enforcement or prevention of fraude or other unlawful acts.

- **To other organizations in case of a merger, joint venture, etc.**
  We may use, disclose or transfer your personal data to a third party in connection with any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

Do we process cookies and similar technologies?

We use cookies and other technologies, as described below.

- **Cookies.**
  Cookies are pieces of information stored directly on the computer that you are using. Cookies allow us to collect information such as browser type, time spent on the services, pages visited, language preferences, and other traffic data. For more information about our use of cookies and similar technologies, please refer to our Cookie Statement on our website.
- **Pixel tags and other similar technologies.**
  Pixel tags. Pixel tags (also known as web beacons and clear GIFs) may be used to, among other things, track the actions of users of our services (including email recipients), measure the success of our marketing campaigns, and compile statistics about usage of the services and response rates. The Portal includes a Twitter pixel and a LinkedIn tag.
- **Analytics.**
  We use Google Analytics, which uses cookies and similar technologies to collect and analyze information about use of our services and report on activities and trends. This service may also collect information regarding the use of other websites, apps and online resources. You can learn about Google's practices by going to www.google.com/policies/privacy/partners/, and exercise the opt-out provided by Google by downloading the Google Analytics opt-out browser add-on, available at https://tools.google.com/dlpage/gaoptout.

Do we take measures to protect your personal data?

We seek to use reasonable organizational, technical and administrative measures to protect your personal data within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the "Contacting Us" section below.

How long do we store your personal data?

We retain personal data for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law. We apply the following retention periods:

Website visitors

Personal data with regard to website visitors are retained for 1 year.

Customers and professional partners

- Personal data with regard to the services we rendered to you are kept for 7 years, including login data, contact details, order details, payment details, contract details etc.
- Camera footage: 4 weeks or longer in case of (suspicion) of illegal/unlawful activities

- In some cases a longer retention period is required by law (for instance in case of transport of chemicals/dangerous substances)

In case of a conflict or legal proceedings we will retain your personal data until 2 years after termination of the proceedings (unless other and longer retention periods are applicable as mentioned above).

Do we process or store personal data outside the EEA?

We do not process personal data outside the EEA. However, we do use IT services provided by organizations based in the United States (Microsoft, Google Analytics) We have taken measures to protect your personal data as much as possible. You understand that the United States may have data protection rules that are different from those of the EEA.

What are your rights with regard to your personal data?

You have the right to request to access, correct, restrict or delete your personal data. You can also request a copy for transmittance of your personal data to another company. If the processing of your personal data is based on consent you can withdraw your consent for the future.

You also have the right to object to the processing of personal data.

We will respond to your request/objection within 1 month.

You have the right to lodge a complaint with the Supervisory Authority.

Updates to this Privacy Statement

The “Last Updated” legend at the top of this Privacy Statement indicates when this Privacy Statement was last revised. Any changes will become effective when we post the revised Privacy Statement on our services.

Contacting us

Nobian Industrial Chemicals Holding B.V. (with its affiliates), located at Van Asch van Wijckstraat 53, 3811 LP Amersfoort, The Netherlands, is the company responsible for collection, use, and disclosure of your personal data under this Privacy Statement.

If you have any questions about this Privacy Statement, please contact our Deputy General Counsel via compliance@Nobian.com

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