PRIVACY POLICY

Rev. January 2020

1. THIS POLICY.

1.1. This Policy pertains to the collection of personal data by Chem-Impex International, Inc. ("Company", "us" or "we"). This Policy is addressed to individuals outside our organization with whom we interact, including visitors to our website (our “Website”), customers, and other users of our products or services (together, “you”). Defined terms used in this Policy are explained in Section 11 below.

1.2. For the purpose of this Policy, Chem-Impex International, Inc. is the Controller of your Personal Data. Contact details for questions are concerns are provided in Section 10 below. This Policy may be amended or updated from time to time to reflect that changes in our practices with respect to the Processing of Personal data, or changes in applicable law. We encourage you to read this Policy carefully, and to regularly check this page to review any changes we might make in accordance with the terms of this Policy.

2. PROCESSING YOUR PERSONAL DATA

2.1. Collection of Personal Data. We process Personal Data that we receive from you as part of our business relationship, i.e. during the initiation, implementation, and execution of the contract for the product you purchased or Personal Data that we collect about you in connection with the use of the product or service. We also process data that you voluntarily provide to us, including while attending trade shows or through our web forms.

2.2. Creation of Personal Data. In providing our products or services, we may also create Personal Data about you, such as records of your interaction with us and details of your order history.

2.3. Relevant Personal Data. The categories of Personal Data about you that we may Process include: name, company, address, country, email address, phone number, billing address, and credit/debit card information.

2.4. Lawful Basis for Processing Personal Data. In Processing your Personal Data in connection with the purposes set out in this Policy, we may rely on one or more of the following legal bases, depending on the circumstances: (i) we have obtained your prior express consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way); (ii) the Processing is necessary in connection with any contract that you may enter into with us; (iii) the Processing is required by applicable law; or (iv) we have a legitimate interest in carrying out the Processing for the purpose of managing, operating or promoting our business, and that legitimate interest is not overridden by your interests, fundamental rights, or freedoms.

2.5. Processing Your Sensitive Personal Data. We do not seek to collect or otherwise Process your Sensitive Personal Data, except where: (i) the Processing is required or permitted by applicable law (e.g., to comply with our diversity reporting obligations); (ii) the Processing is necessary for the detection or prevention of crime; (iii) the Processing is necessary for the establishment, exercise or defense of legal rights; or (iv) we have, in accordance with applicable law, obtained your prior explicit consent prior to Processing your Sensitive Personal Data (as above, this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).
If you provide Sensitive Personal Data to us (you must ensure that it is lawful for you to disclose such data to us, including ensuring that one of the legal bases set out above is available to us with respect to the Processing of those Sensitive Personal Data.

2.6. *Purposes for which we may Process your Personal Data.* The purposes for which we may Process Personal Data, subject to applicable law, include:

- operating and managing our Website; providing content to you, displaying information to you when you visit our Websites or otherwise;
- providing our Website, products, or other services and communications in relation to those products or services;
- communicating with you via any means (including via email, telephone, text message, social media, post or in person) subject to ensuring that such communications are provided to you in compliance with applicable law;
- managing our communications systems; operation of IT security; and IT security audits;
- conducting health and safety assessments and record keeping; and compliance with related legal obligations;
- managing sales; finance; corporate audit; and vendors;
- engaging with you for the purposes of obtaining your views on our products or services;
- identifying issues with existing services; planning improvements to existing services; and creating new services; and
- administering applications for positions with us.

2.7. *Voluntary Provision of Personal Data and Consequences of Non-Provision.* The provision of your Personal Data to us is voluntary and will usually be a requirement necessary in order to enter into a contract with us and to enable us to fulfil our contractual obligations towards you. You are under no statutory obligation to provide your Personal Data to us; however, if you decide not to provide us with your Personal Data, we will not be able to conclude a contractual relationship with you and to fulfil our contractual obligations towards you.

3. **DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES**

3.1. We may disclose your Personal Data in order to fulfil our contractual obligations towards you or for legitimate business purposes (including providing products or services to you and operating our Website), in accordance with applicable law. In addition, we may disclose your Personal Data to:

- legal and regulatory authorities, upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulation;
- accountants, auditors, lawyers and other outside professional advisors to us, subject to binding contractual or legal obligations of confidentiality;
- third party Processors (such as payment services providers; shipping/courier companies; technology suppliers, customer satisfaction survey providers, operators of “live-chat” services and processors) who provide compliance services such as checking government issued prohibited lists, located anywhere in the world, are subject to the requirements noted below in this Section 3;
• any relevant party, law enforcement agency or court, to the extent necessary for the establishment, exercise or defense of legal rights, or any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties;

• any relevant third-party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets (including in the event of a reorganization, dissolution or liquidation), but only in accordance with the applicable law; and

• our Website may use third party content. If you choose to interact with any such content, your Personal Data may be shared with the third-party provider of the relevant social media platform. We recommend that you review that third party’s privacy policy before interacting with its content.

3.2. If we engage a third-party Processor to Process your Personal Data, we will conclude a data processing agreement as required by the applicable laws with such third-party Processor so that the Processor will be subject to binding contractual obligations to: (i) only Process the Personal Data in accordance with our prior written instructions; and (ii) use measures to protect the confidentiality and security of the Personal Data; together with any additional requirements under applicable law.

3.3. If we engage a third-party Processor to Process your Personal Data, we will conclude a data processing agreement as required by the applicable laws with such third-party Processor so that the Processor will be subject to binding contractual obligations to: (i) only Process the Personal Data in accordance with our prior written instructions; and (ii) use measures to protect the confidentiality and security of the Personal Data; together with any additional requirements under applicable law.

4. INTERNATIONAL TRANSFER OF PERSONAL DATA

4.1. Because of the international nature of our business, we may need to transfer your Personal Data within our Company, and to third parties as noted in Section (3) above, in connection with the purposes set out in this Policy. For this reason, we may transfer your Personal Data to other countries that may have lower standards for data protection than where you live.

Where we transfer your Personal Data to other countries, we do so, where required on the basis of Standard Contractual Clauses. You may request a copy of our Standard Contractual Clauses using the contact details provided in Section 10 below.

5. DATA SECURITY

5.1. We have implemented appropriate technical and organizational security measures designed to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, unauthorized access, and other unlawful or unauthorized forms of Processing, in accordance with applicable law.

You are responsible for ensuring that any Personal Data that you send to us are sent securely.

6. DATA ACCURACY

6.1. We take every reasonable step to ensure that: (i) your Personal Data that we Process are accurate and, where necessary, kept up to date; and (ii) any of your Personal Data that we Process that are inaccurate (having regard to the purposes for which they are Processed) are erased or rectified without delay.

From time to time we may ask you to confirm the accuracy of your Personal Data.

7. DATA MINIMIZATION

7.1. We take every reasonable step to ensure that your Personal Data is only processed for the minimum period necessary for the purposes set out in this Privacy Policy. We will retain copies of your Personal Data in a form that permits identification only for as long as: (i) we maintain an ongoing
relationship with you (e.g., where you are a user of our services, or you are lawfully included in our mailing list and have not unsubscribed); or (ii) your Personal Data are necessary in connection with the lawful purposes set out in this Privacy Policy, for which we have a valid legal basis (e.g., where your personal data are included in an order placed by your employer, and we have a legitimate interest in processing those data for the purposes of operating our business and fulfilling our obligations under that contract).

7.2. Additionally, we will retain Personal Data for the duration of: During the periods noted above in relation to legal claims, we will restrict our Processing of your Personal Data to storage of, and maintaining the security of, the Personal Data, except to the extent that the Personal Data needs to be reviewed in connection with any legal claim, or any obligation under applicable law; Once the periods above, each to the extent applicable, have concluded, we will permanently delete or destroy the relevant Personal Data.

8. YOUR LEGAL RIGHTS

8.1. As a data subject you have the following rights:

- You can request access to your personal data, including the provision of a copy of the personal data undergoing processing.
- You can ask us to update or correct any inadequate, incomplete or inaccurate data.
- You can request the erasure of your personal data, if the legal requirements are satisfied. This is the case, in particular, if:
  - your personal data is no longer needed for the purposes of which it was collected
  - the sole legal basis for processing such data was your consent, and you have withdrawn such consent;
  - you have objected to processing on the legal grounds relating to your particular situation, and we cannot prove that there are overriding legitimate grounds for processing;
  - your personal data were processed unlawfully; or
  - your personal data must be erased in order to comply with legal requirements
- You can restrict the processing of personal data under certain conditions. The requirements are:
  - the accuracy of your personal data is contested by you and we must verify the accuracy of the personal data;
  - the processing is unlawful, but you oppose the erasure of the personal data and request the restriction of their use instead;
  - We no longer needs the personal data for the purposes of processing, but you require the data to establish, exercise or defend your legal claims;
  - you have objected to processing pending the verification of whether our legitimate grounds override your legitimate grounds.
- You have the right to data portability, e.g. you can ask us to provide your personal data in a structured, commonly used and machine-readable format for your use or transfer to another controller.
- You can lodge a complaint with a supervisory authority.
• Where processing is based on your consent, you have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

• **Right to object** - to the extent that we are relying on our legitimate interests to use your personal data, you have the right to object to such use, and we must stop such processing unless we can either demonstrate compelling legitimate grounds for the use that override your interests, rights and freedoms or where we need to process the data for the establishment, exercise or defense of legal claims. In addition, you can object to the processing of your personal data for direct marketing purposes, which includes profiling to the extent that it is related to such direct marketing without providing any reason. We will then cease the processing of your personal data for direct marketing purposes.

8.2. To exercise one or more of these rights, or to ask a question about these rights or any other provision of this Policy, or about our Processing of your Personal Data, please use the contact details provided in Section 10.

8.3. If we are providing you with services based on orders, such provision of services is regulated by contractual terms provided to you. In case of discrepancies between such terms and this Policy, this Policy is supplementary.

9. **DIRECT MARKETING**

9.1. Subject to applicable law, where you have provided explicit consent in accordance with the applicable law or where we are sending you press releases and other marketing communications, we may Process your Personal Data to contact you via email, telephone, direct mail or other communication formats to provide you with information, products or services that may be of interest to you. If we provide products or services to you, we may send information to you regarding our products or services, upcoming promotions and other information that may be of interest to you, using the contact details that you have provided to us and always in compliance with applicable law.

You may unsubscribe from our promotional email list or newsletters at any time by simply clicking on the unsubscribe link included in every email or newsletter we send. After you unsubscribe, we will not send you further emails, but we may continue to contact you to the extent necessary for the purposes of any product or services you have requested.

10. **CONTACT DETAILS**

10.1. If you have any requests or questions, please feel free to contact our In-House General Counsel:

Address:

In-House General Counsel  
Chem-Impex International, Inc.  
935 Dillon Drive  
Wood Dale, Illinois 60191

E-Mail: jessica@chemimpex.com

11. **DEFINITIONS**

• ‘Controller’ means the entity that decides how and why Personal Data is Processed. In many jurisdictions, the Controller has primary responsibility for complying with applicable data protection laws.

• ‘Data Protection Authority’ means an independent public authority that is legally tasked with overseeing compliance with applicable data protection laws.

• ‘Personal Data’ means information that is about any individual, or from which any individual is identifiable. Examples of Personal Data that we may Process are provided in Section (B)
• ‘Process’, ‘Processing’ or ‘Processed’ means anything that is done with any Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

• ‘Processor’ means any person or entity that Processes Personal Data on behalf of the Controller (other than employees of the Controller).

• ‘Services’ means any services provided by Company.

• ‘Sensitive Personal Data’ means Personal Data about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, national identification number, or any other information that may be deemed to be sensitive under applicable law.

12. COOKIES

12.1. We collect information automatically through the use of "cookies". Cookies may be set by us, or they may be set by third parties. A cookie is a text file containing small amounts of information that a website can send to your browser, which may then be stored on your computer as a tag that distinguishes your computer but does not name you. Some of our Website pages use cookies to better serve you when you return to the Website.

12.2. You can set your browser to notify you before you receive a cookie, giving you the chance to decide whether to accept it. You can also set your browser to turn off cookies; however, if you do this, some portions of our Website may not work properly.

12.3. You can set your browser to notify you before you receive a cookie, giving you the chance to decide whether to accept it. You can also set your browser to turn off cookies; however, if you do this, some portions of our Website may not work properly.

12.4. For information about the specific cookies and web beacons used on this Website, please refer to our Cookies Policy.