GLOBAL INFORMATION TECHNOLOGY

Privacy Statement

VERSION 3

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TEKNOR APEX
INFORMATION TECHNOLOGY



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1. PURPOSE AND CONTROLLER

This Privacy Statement describes how Teknor Apex Company, Rhode Island, USA and its subsidiaries ("Teknor Apex" "we" or "us"), will be the controller to your personal data, collect it and make use of it when you submit it to us via our websites www.teknorapex.com, www.teknorapex.com,

2. WHAT INFORMATION DO WE COLLECT?

- 2.1. We collect and process personal data about you when you submit data to us via our website, interact with us, or use our websites. This includes:
 - your name and the organization that you work for, your job title, division, email address, phone and/or other contact details you may provide to us;
 - interests that you have expressed to us (e.g., in materials or processes or in speaking with specific contacts or roles within Teknor Apex);
 - your marketing preferences, including any consent you have given to us;
 - information related to the browser or device you use to access our website and information regarding your use of our website;
 - if you are an existing customer, we also store information on Safety Data Sheets (SDS) that you have requested from us.
- 2.2. If you visit any of our facilities, we will collect and process your personal data to ensure our facilities and your security. This includes:
 - your name and the organization that you work for, your job title, signature, email address, phone and/or other contact details you may provide to us;
 - time of arrival and departure;
 - we may collect acknowledgement of health.
- 2.3. If you are a job applicant, we collect the following personal data you supply to us:
 - name, email address, password, phone number, full address, job title, current employer, employment dates, level of education, school name, professional skills, behaviors and motivations, licenses and certifications you earned, as well as any optional data you might choose to disclose or additional data you might include in your resume.

3. HOW DO WE USE THIS INFORMATION, AND WHAT IS THE LEGAL BASIS FOR THE USE?

3.1. We process your personal data as required by Teknor Apex to conduct our business and pursue our legitimate interests, including:



- we will use your information to provide products and services you have requested, and respond to any comments or complaints you may send us;
- we monitor the use of our website, and use your information to help us monitor, improve and protect our network, facilities, products, content, services and websites.
- 3.2. We process your personal data where you give us consent:
 - we will send you direct marketing in relation to our products and services or products and services provided by Teknor Apex and our subsidiaries;
 - we will place cookies and use similar technologies that are not necessary for the provision of our
 website in accordance with our <u>Cookies Policy</u>, as set out below, and the information provided to
 you when those technologies are used;
 - on other occasions where we ask you for consent, we will use the data for the purpose which we
 explain at that time (such as during events).
- 3.3. We process your personal data for job application purposes or in preparation for potential employment:
 - we will process job applications that you submit via our website, or other means, in order and as required to handle your application.
- 3.4. If you are a client, supplier or other sort of business partner or employee of such, we process your data for the performance of the contract or to enter into a contract with you as well as to pursue our legitimate interests (as applicable), to:
 - account and record customer and provider transactions as required for internal accounting purposes and for preparing statutory filings, audits and financial reviews;
 - advertising and marketing, including sending communications with information about our products, conducting public relations activities and running events;
 - conducting business including delivering goods and rendering services, invoicing, collecting and
 processing payments, logging customer contact information, providing customer service, assessing
 potential customers, reviewing and forecasting customer activity, managing customer interaction,
 maintaining service levels, addressing customer complaints and enquiries.
- 3.5. We process your personal data for purposes which are required by law:
 - In response to lawful requests by government or law enforcement authorities;
 - We might collect your information to track and trace activities related to the pandemic when you visit our offices as applicable. You will receive more information on-site.

4. TRANSFER OF DATA TO THE USA



- 4.1. Teknor Apex's subsidiaries share and process the data as described in this Privacy Statement with Teknor Apex's entities in the USA to obtain corporate support and services in different areas. When personal data is being transferred Teknor Apex relies on two safeguards set in place for that purpose: Standard Contractual Clauses to bind the importing entity, Teknor Apex Company, to the same standard of processing as the exporting entity and the EU-U.S. Data Privacy Framework ("EU-U.S. DPF", "Data Privacy Framework" or "DPF") as set forth by the U.S. Department of Commerce and the European Commission, regarding the collection, use, and retention of personal data transferred from the European Union to the United States, and their related principles (the "Data Privacy Framework Principles").
- 4.2. Teknor Apex Company, complies with the Data Privacy Framework [(EU-U.S. DPF)] as set forth by the U.S. Department of Commerce. Teknor Apex Company, has certified to the U.S. International Trade Administration, within the U.S. Department of Commerce, that it adheres to the Data Privacy Framework Principles ([EU-U.S. DPF Principles]) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF. If there is any conflict between the terms in this Privacy Statement and the EU-U.S. DPF, the Data Privacy Framework Principles shall govern.
- 4.3. Teknor Apex Company, is committed to processing all personal data received from countries within the European Economic Area as described in this statement and in compliance with the Data Privacy Framework. Teknor Apex Company, is subject to the enforcement and investigative powers of the United States Federal Trade Commission.
- 4.4. In compliance with the Data Privacy Framework Principles, Teknor Apex commits to resolve complaints about our collection or use of your personal data. EU individuals with inquiries or complaints regarding this policy should first contact Teknor Apex by following the instructions in the <u>How to Exercise Your Rights section</u>.
- 4.5. In compliance with the Data Privacy Framework Principles, Teknor Apex Company, commits to resolve DPF Principles-related complaints about our collection or use of your personal data. Individuals with inquiries or complaints about our handling of personal data received in reliance on the EU-U.S. DPF should first contact Teknor Apex Company, or our EU subsidiaries by following the instructions in the How to Exercise Your Rights section.
- 4.6. To learn more about the Data Privacy Framework program, and to view our certification, please visit the Data Privacy Framework website. Please also find a list of the companies participating in the DPF here.

5. WHO WILL WE SHARE THIS DATA WITH, WHERE, AND WHEN?

- 5.1. We may share your personal data with our subsidiaries based on our business needs and our legitimate interest. This may be necessary to support our business activities and best support your interest or your needs.
- 5.2. Depending on the nature of your request, we may decide that one of our distributors is best suited to help you rather than Teknor Apex directly. In this case, we will ask for your consent to share your personal data with one of our distributors for the distributor to respond to your request.



- 5.3. Personal data will also be shared with third party service providers, who will process it on behalf of Teknor Apex for the same purposes identified above. We use third party service providers of website hosting, IT solutions, maintenance services and marketing agencies for digital marketing and automation services.
- 5.4. Under the Data Privacy Framework, Teknor Apex Company, is responsible for the processing of personal data we receive and subsequently transfer to a third party acting as an agent on our behalf. We are liable for ensuring that the third parties acting as an agent on our behalf support our EU-U.S. DPF commitments, unless Teknor Apex Company, proves that it is not responsible for the event giving rise to the damage.
- 5.5. The Federal Trade Commission has jurisdiction over Teknor Apex Company's, compliance with the EU-U.S. DPF. Teknor Apex Company, may be required to disclose your personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

6. SALE OF PERSONAL DATA

6.1. Neither Teknor Apex or any of its subsidiaries sells or has sold in the preceding 12 months or ever, any personal data we process. These facts, notwithstanding, you can opt out of any future sale of data by following the instructions in the How to Exercise Your Rights section.

7. WHERE DO WE PROCESS YOUR DATA?

7.1. Teknor Apex is a global company and may store your personal data in locations outside of your home country, including in the United States. These countries may have lower standards of protection than those of your home country. Teknor Apex applies similar protections to your data, regardless of the location, and has safeguards in place as described in the "<u>Transfers of data to the USA" section</u>. Please follow the instructions in the <u>How to Exercise Your Rights section</u> to obtain a copy of them or where they have been made available.

8. HOW LONG WILL WE RETAIN YOUR DATA?

- 8.1. It is Teknor Apex's policy to retain data only for as long as needed to meet the stated business purposes and compatible purposes. The deletion of the data will be driven by our Data Retention Policy.
- 8.2. Where we process personal data with your consent, we process the data until you ask us to stop and for a short period after this (to allow us to implement your requests) if and to the extent needed.
- 8.3. Where we process your data for marketing purposes and you ask us to stop doing so, we will maintain a record of your request if necessary to remember and not send you direct marketing or process your data to respect your request in future initiatives.

9. WHAT ARE YOUR RIGHTS?

- 9.1. You have rights regarding your Personal Data, to the extent provided for by the law and regulations applicable to the processing of your Personal Data or under the Data Privacy Framework.
- 9.2. RIGHT TO ACCESS, AND OBTAIN A COPY OF PERSONAL DATA



- 9.2.1. You may have the right to request information as to whether we process personal data. Where that is the case, you have the right to access information about the personal data we've collected about you and obtain a copy. You may request to know the following information:
 - The categories and specific pieces of personal data we have collected about you;
 - The sources of personal data we collected about you;
 - the purpose for of the processing;
 - The categories of third parties with whom we share personal data, including whether such
 disclosures were made for a business purpose, and if so, the categories of personal data disclosed to
 each category of recipient.
 - where possible, the period for which we store the personal data, or, if not possible, the criteria used to determine that period;
 - Whether we have sold your personal data and if so the categories of personal data that each category of recipient purchased;
- 9.2.2. The frequency of your requests for information might be limited by regulations.

9.3. RIGHT TO RECTIFICATION

9.3.1. We strive to keep your data up to date and accurate. You have the right to obtain from us the rectification of data in our possession being incorrect or inaccurate.

9.4. RIGHT TO REQUEST DELETION

9.4.1. You have the right to request that we delete your personal data. Under certain circumstances we may not be able to delete your personal data, for example, to comply with legal obligations, or to complete a business transaction that you have requested.

9.5. RIGHT TO NON-DISCRIMINATION

9.5.1. You have a right not to receive discriminatory treatment for exercising your privacy rights as identified in this privacy statement.

9.6. RIGHT TO RESTRICTION OF THE PROCESSING

9.6.1. You have the right to request from us the restriction of processing.

9.7. RIGHT TO DATA PORTABILITY

- 9.7.1. You have the right to receive your personal data that you have provided in a structured, commonly used and machine-readable format and transmit it to another controller or ask us to directly transmit it.
- 9.8. RIGHT TO WITHDRAW CONSENT OR OBJECT TO PROCESSING. THIS IS YOUR CHOICE.



9.8.1. Wherever we rely on your consent, you have the right to withdraw that consent at any time with effect for the future. If we need to process that data for other purposes, based on other legal grounds, we might continue processing it for those purposes.

9.9. RIGHT TO OBJECT AND RIGHT TO OPT OUT OF DIRECT MARKETING

- 9.9.1. You have the right to object to the processing of your personal data, on grounds relating to your particular situation.
- 9.9.2. You also have the right to opt out of, or object to, direct marketing at any time. When this is via an electronic message you can do so by following the instructions in the communication itself. Otherwise, you can do as suggested in the "How to Exercise Your Rights" section.

9.10. DPF CHOICES

Under the DPF, Teknor Apex Company, offers you to choose (opt out) whether your personal information is (i) to be disclosed to a third party other than agents or (ii) to be used for a purpose that is materially different from the purpose(s) for which it was originally collected or subsequently authorized by you by using the contact information set out in Section 9.12.

9.11. HOW TO EXERCISE YOUR RIGHTS AND CHOICES

- 9.11.1. To exercise the rights mentioned above, you may make the request in the following ways:
 - Follow this <u>LINK</u> and complete the Individual Rights Request;
 - Write to Director of Data Privacy, Teknor Apex Company, 505 Central Avenue, Pawtucket, RI 02861, United States of America
 - Email or call us at:

•	Europe:	DPO@TeknorApex.com	Tel:	+49 871 14 24 91 62
•	Singapore	DPO@TeknorApex.com	Tel:	+65 6586 8949
•	China	DPO@TeknorApex.com	Tel:	+86 (512) 6287 1550 Ext 360
•	North America	DPO@TeknorApex.com	Tel:	+1 401 642 3284
•	North America	DPO@TeknorApex.com	Toll Free	+1 800 556 3864

- 9.11.2. When you submit a request, we will verify your request and identity. You may designate an authorized agent to submit a request on your behalf. You must provide the authorized agent with written permission to do so and verify your own identity with us directly. We will deny any request where an identity cannot be verified or from any agent that does not submit proof of authorization.
- 9.11.3. All requests are handled by a confidential team at Teknor Apex, with efforts made to ensure that each request is managed by a Data Protection Officer (DPO) local to the requestor.



10. HOW DO YOU GET IN TOUCH WITH US?

10.1. We hope that we can answer the questions you may have about the way we process your data. If you have any concerns about how we process your data, you can contact us by using one of the methods listed in the How to Exercise Your Rights section.

11. RIGHT TO COMPLAIN

- 11.1. If you have unresolved concerns, you have the right to complain to the competent data protection authority. Use one of the following links to find your Data Protection Authority.
 - EEA
 OUR MEMBERS | EUROPEAN DATA PROTECTION BOARD
 - SINGAPORE <u>HTTPS://WWW.PDPC.GOV.SG/</u>
 - CHINA <u>HTTPS://WWW.CAC.GOV.CN/</u>
 - USA
 FEDERAL TRADE COMMISSION | PROTECTING AMERICA'S CONSUMERS
- 11.2. In compliance with the EU-U.S. DPF, Teknor Apex Company, has further committed to refer unresolved complaints concerning our handling of personal data received in reliance on the DPF to the <u>JAMS DPF</u> <u>Dispute Resolution</u> ("JAMS") an independent alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgement of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please contact the <u>JAMS DPF independent recourse mechanism</u>. The services of JAMS are provided at no cost to you. Under certain conditions, you may have the possibility to engage in binding arbitration to resolve residual disputes. For more information on this option, please see <u>Annex I of the Data Privacy Framework Principles</u>.

12. COOKIE POLICY

12.1. We use cookies to collect information about your online preference. Cookies are small pieces of information sent by a web server to a web browser which allows the server to uniquely identify the browser on each page or similar technologies.

We use the following categories of cookies on our website:

12.2. Required Cookies

These cookies are essential to enable you to move around the website and use its features. Without
these cookies, services you have asked for such as remembering your login details or shopping
basket items cannot be provided.

12.3. Functional Cookies

• These cookies remember choices you make such as the country you visit our website from, language and search parameters such as size, Color or product line. These can then be used to provide you



- with an experience more appropriate to your choices and to make the visits more tailored and pleasant.
- These cookies collect information to help us analyse how people use our website. Understanding how customers arrive at our site, browse or use our site help us highlight where we can improve areas such as navigation. The data stored by these cookies never shows personal details from which your individual identity can be established.

12.4. ADVERTISING COOKIES

- We do not use Advertising Cookies for direct marketing, targeting or other promotional purposes. None of the cookies we use can track your browsing activity on other websites.
- 12.5. At any time, you can manage your cookie preferences using the Cookie Preference Banner/Link located at the bottom of the web page.

13. RELATED DOCUMENTS

Document	Description	

14. REVISION HISTORY

Version	Date	Reviewer & Approver	Description
1	2021-02-19	Raymond Rockefeller	Original policy
2	2025-06-01	Raymond Rockefeller	Updated policy
3	2025-08-01	Raymond Rockefeller	Added DPF language