

AGC Chemicals Europe, Ltd.

Website Privacy Policy

Last Updated : September 2018

1. About this Policy

- 1.1 This Privacy Policy ("**Policy**") explains how we (as defined below) collect, share and use any information that, alone or in combination with other information, relates to you ("**Personal Data**") when you ("**you**" and "**your**") use our website.
- 1.2 This Policy also sets out the rights that you have in relation to the Personal Data that we process about you and how you can exercise them.
- 1.3 AGC treats compliance with its privacy obligations seriously. This is why we have developed this Policy, which describes the standards that AGC applies to protect Personal Data.
- 1.4 For the purposes of this Policy, AGC Chemicals Europe, Ltd. with registered office at PO Box 4, York House, Hillhouse International, Thornton Cleveleys, FY5 4QD, United Kingdom acts as the data controller for the Personal Data that is collected via the Website. As a data controller, AGC is responsible for ensuring that the processing of Personal Data complies with applicable data protection law, and specifically with the General Data Protection Regulation.
- 1.5 Please take the time to read this Policy carefully. If you have any questions or comments please send them by email to gdpr.requests@agcce.com.

2. What Personal Data does AGC collect and why?

- 2.1 The types of Personal Data that we may collect about you, and the reasons why we process it, include:
 - (a) Information that you voluntarily provide to us; such as when you complete forms. This may include information such as your name and contact details. This data allows us to reply to your queries and provide you with relevant or requested information.
 - (b) We may also collect certain information automatically from your device using cookies. Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our website, including the pages accessed and links clicked. Collecting this information enables us to better understand the visitors who come to our website, where they come from, and what content on our website is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our website to our visitors.

See also our "Cookie Policy" for more information.

3. Who does AGC share your Personal Data with?

3.1 We may disclose your Personal Data to the following categories of recipients:

- (a) to **our group companies** for purposes consistent with this Policy. We take precautions to allow access to Personal Data only to those staff members who have a legitimate business need for access and with a contractual prohibition of using the Personal Data for any other purpose.
- (b) to **our third party vendors, services providers and partners** who provide data processing services to us, or who otherwise process Personal Data for purposes that are described in this Policy or notified to you when we collect your Personal Data. This may include disclosures to third party vendors and other service providers we use in connection with the services they provide to us, including to support us in areas such as IT platform management or support services, infrastructure and application services, data analytics;
- (c) to **any competent law enforcement body, regulatory, government agency, court or other third party** where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- (d) to **our auditors, advisors, legal representatives and similar agents** in connection with the advisory services they provide to us for legitimate business purposes and under contractual prohibition of using the Personal Data for any other purpose;

4. How we protect your privacy

4.1 We will process Personal Data in accordance with this Policy, as follows

- (a) **Fairness:** We will process Personal Data fairly. This means that we are transparent about how we process Personal Data and that we will process it in accordance with applicable law.
- (b) **Purpose limitation:** We will process Personal Data for specified and lawful purposes, and will not process it in a manner that is incompatible with those purposes.
- (c) **Proportionality:** We will process Personal Data in a way that is proportionate to the purposes which the processing is intended to achieve.
- (d) **Data accuracy:** We take appropriate measures to ensure that the Personal Data that we hold is accurate, complete and, where necessary, kept up to date. However, it is also your responsibility to ensure that your Personal Data is kept as accurate, complete and current as possible by informing AGC of any changes or errors.
- (e) **Data security:** We use appropriate technical and organisational measures to protect the Personal Data that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your Personal Data.
- (f) **Data processors:** We may engage third parties to process Personal Data for and on behalf of AGC. We require such data processors to process Personal Data and act strictly on our instructions and to take steps to ensure that Personal Data remains protected.

- (g) **International data transfers:** Your Personal Data may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country.

However, we have taken appropriate safeguards to require that your Personal Data will remain protected in accordance with this Policy. These include implementing an intra-group data transfer agreement (the "**Intra-Group Data Transfer Umbrella Agreement**") based on the European Commission's Standard Contractual Clauses for transfers of Personal Data between our group companies, which require all group companies to protect Personal Data they process from the EEA in accordance with European Union data protection law.

- (h) **Data Retention:** We retain Personal Data we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your Personal Data, we will either delete or anonymise it or, if this is not possible (for example, because your Personal Data has been stored in backup archives), then we will securely store your Personal Data and isolate it from any further processing until deletion is possible.

5. Your data protection rights

5.1 You have the following data protection rights:

- (a) If you wish to **access, correct, update or request deletion** of your Personal Data, you can do so at any time by contacting us by email at gdpr.requests@agcce.com or by contacting your AGC contact person.
- (b) In addition, in certain circumstances, you can **object to processing** of your Personal Data, ask us to **restrict processing** of your Personal Data or **request portability** of your Personal Data. Again, you can exercise these rights by contacting us by email at gdpr.requests@agcce.com or by contacting your AGC contact person
- (c) If we have collected and processed your Personal Data with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Personal Data conducted in reliance on lawful processing grounds other than consent.
- (d) If you have a complaint or concern about how we are processing your Personal Data then we will endeavour to address such concern(s). If you feel we have not sufficiently addressed your complaint or concern, you have the **right to complain to a data protection authority** about our collection and use of your Personal Data. For more information, please contact your local data protection authority.

5.2 We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

6. Linking to other websites

- 6.1 The Website may contain hyperlinks to websites owned and operated by third parties. These websites have their own privacy policies and we urge you to review them. They will govern the use of Personal Data you submit whilst visiting these websites.

We do not accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

7. Updates to this Policy

- 7.1 We may update this Policy from time to time in response to changing legal, technical or business developments. When we update our Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Policy changes if and where this is required by applicable data protection laws.
- 7.2 You can see when this Privacy Policy was last updated by checking the “last updated” date displayed at the top of this Policy.