

INEOS SOLVENTS GERMANY GMBH – PRIVACY STATEMENT

1. Introduction

We, INEOS Solvents Germany GmbH (hereinafter "INEOS" or "we"), would like to inform you about the management of your personal data in accordance with the applicable data protection laws.

There are multiple situations, in which we process your personal data. In the following, we would like to describe, how we collect, process and secure your personal data. We will always indicate who the controller for the processing operations is.

Your personal data will be kept confidential and will not be shared otherwise than in accordance with this Privacy Statement. However, INEOS is entitled to use and disclose any personal data, if we can demonstrate that this is in our legitimate interest, serves performance of a contract or is part of a legal obligation imposed on us, e.g. in order to enforce, if necessary, compliance with contractual agreements with the Company or such User or applicable laws; as part of a merger or sale of a business; when required by law or to respond to legal process or lawful requests, including from law enforcement or other government agencies; when required to combat fraud or to protect INEOS' interests; or to protect life and safety.

Should we be required to share your personal data with anyone else, we will contact you directly. INEOS will not sell any personal data pertaining to you for commercial purposes.

This Privacy Statement is effective as of May 25, 2018 and will be updated from time to time to reflect any changes in the way we handle your personal data or any changes in applicable laws.

2. General Information for every Personal Data Processing

2.1. Personal Data

Personal data is any information about yourself as an individual that can be linked to you or can be used to identify you. If we process your personal data, you are entitled to know what personal data we collect, for which purpose we are processing your personal data, who has access to and for how long we retain your personal data. INEOS uses your personal data for several purposes and only collects personal data for such purposes. Accessibility and retention might vary accordingly.

If you are our employee, please see the INEOS Solvents Germany intranet.

If you are our business partner (e.g. customer or supplier), please see section 3.

If you have been addressed for marketing purposes, please see section 4.

If you are an applicant to a job offer, please see section 5.

If you are using our website, please see section 6

2.2. Retention

If not otherwise specified in the below sections, we will retain your personal data only for as long as is necessary, i.e. for an ongoing relationship with you, in order to comply with our global legal and contractual obligations. We maintain specific records management and retention policies and procedures, so that personal data are deleted after a reasonable time according to the following retention criteria:

When we no longer require processing your data, we will notify any third party data processor to delete your personal data.

2.3. Your Rights

You are entitled (in the circumstances and under the conditions, and subject to the exceptions, set out in applicable data protection laws) to:

- Request access:

This right entitles you to know whether we hold and process personal data about you and, if we do, to obtain information on and a copy of that personal data.

- Request a rectification:

This right entitles you to have your personal data corrected without undue delay if it is inaccurate or incomplete.

- Object to the processing:

This right entitles you to request that we no longer process your personal data at any time for reasons arising out of your particular situation. We will then no longer process your personal data, unless there are demonstrably compelling legitimate grounds for processing, which override the interests, rights and freedoms of the person concerned, or the processing serves the purpose of asserting, exercising or defending legal claims.

- Request the erasure:

This right entitles you to request the erasure of your personal data without undue delay, including where such personal data would no longer be necessary to achieve the purposes.

- Request the restriction of the processing:

This right entitles you to request that INEOS only processes your personal data in limited circumstances, including with your consent, or to restrict it to mere storage, e.g. if you revoke consent.

- Request portability:

This right entitles you to receive a copy (in a structured, commonly used and machine-readable format) of personal data that you have provided to us, or request INEOS to transmit such personal data to another data controller.

- Lodge a complaint with a supervisory authority:

Although, we always invite you to address your concerns with us directly, this right entitles you to lodge a complaint with a supervisory authority if you consider the processing of the data concerning you infringes data protection regulations. The right to lodge a complaint may be invoked in particular in the Member State of your habitual residence, place of work or the place of the alleged infringement.

2.4. Recipients including Data Transfers to Third Countries (Non-EU Countries)

INEOS Group has companies all over the world and we may in some circumstances share your personal data with / transfer your personal data to recipients, i.e. colleague(s), in third countries outside of the EU. Also, we may share your information with third parties, such as payroll service providers, social security insurance, etc. In each case, we ensure an adequate level of personal data protection through technical and organizational measures in compliance with relevant data protection laws, including, yet not limited to the GDPR.

Internally, we have concluded an intragroup agreement on data protection and data transfers using Standard Contractual Clauses.

If personal data is transferred outside the INEOS Group and / or the EU / EEA, we have ensured that the recipients offer an adequate level of data protection, by either relying on Privacy Shield, the EU Standard

Contractual Clauses or other means recognized by the GDPR to establish an adequate level of personal data protection. In case of doubt we audit our processors.

2.5. Data Security and Automated Decision-making

INEOS maintains reasonable and appropriate physical, electronic and procedural safeguards, in accordance with Data Protection Laws, to protect personal data from being manipulated, lost, destroyed or accessed by unauthorized persons. Where data is passed on to external service providers, INEOS has taken technical and organizational measures to ensure that the data protection regulations are observed.

INEOS – at this point – exercises no automated decision-making, including profiling.

2.6. Contact

If you have a general question about how INEOS protects your personal data, if you wish to make a complaint about our use of your personal data or if you wish to exercise your rights in relation to your personal data rights, please contact us at:

INEOS Solvents Germany GmbH
Data Protection Coordinator
Shamrockstr. 88
44623 Herne
Germany

Phone +49 2323 1477 3703

Mail: datenschutz.solvents@ineos.com

3. Business Partners (Suppliers, Customers)

If you and / or your employer conduct business with INEOS, in various situations, it may be necessary to process your personal data.

3.1. Controller / Recipient

Controller of your data is the INEOS entity that you are doing business with. The relevant entity is indicated in every business letter and other official communication that you have received from us.

In case we receive your personal data via our homepages including but not limited to our website, e-shop or mobile application (hereinafter "Site"), controller of your personal data is INEOS Solvents Germany GmbH.

The respective teams in our organization (e.g. business, finance, logistics) involved in the purpose will share and disclose such personal data as required to complete the purpose. Given INEOS group structure, this might include disclosure to third countries or international organizations. Again, as indicated above, we always ensure an adequate level of data protection, prior to granting access.

3.2. Personal Data and Purpose

We collect your personal data for the purpose to perform a contract with you. This comprises your business contact data (e.g. name, business phone, business e-mail, business fax).

3.2.1. Purpose and contractual obligations

We process your personal data to execute our business relationship and / or perform a contract, i.e. to exercise our rights and to perform our obligations of any specific contract with us, which then defines the relevant scope and content.

The personal data, which is necessary for the performance of a contract or a quotation, will be deleted without undue delay after termination / completed performance of any and all of the contractual rights and obligations between us; during that time, it will only be kept in order to be able to respond to queries. The data will not be deleted as long as there are any outstanding obligations and / or invoices, which are to be collected. Should there be any legal retention requirements, the affected personal data will be archived for the statutory period.

In addition, we are currently introducing a customer relationship management (CRM) database technology to manage and track our marketing efforts. Our CRM databases include personal data belonging to individuals at our customers and other companies with whom we already have a business relationship or want to develop one. The personal data used for these purposes includes relevant business information, such as: contact data, publicly available information (e.g. board membership, published articles, press releases, your public posts on social media sites if relevant for business purpose), your responses to targeted e-mail (including web activity following links from our e-mails), Site activity of registered users of our Site, and other business information included by INEOS professionals based on their personal interactions with you.

If you wish to be excluded from our CRM databases, please contact us.

3.3. Legitimate Interests

There may be situations when it is necessary to contact you in matters that are not directly connected to the performance of a contract. This may include general remarks, inquiries, requests, etc.

In these situations, we may process your data in our legitimate interests. The legitimate interest arises from the interest to conduct, maintain or initiate the business relationship with customers, interested parties, suppliers and other business partners and to maintain personal contact with contact persons.

4. Marketing

4.1. Controller

Controller of your personal data is the INEOS entity that you are doing business with. The relevant entity is indicated in every business letter and other official communication that you have received from us.

In case we received your personal data via our Site, controller of your personal data is INEOS Solvents Germany GmbH.

The respective business teams in our organisation will share and disclose such personal data as required to complete the purpose. Given our company structure, this might include disclosure to third countries or international organizations.

4.2. Personal Data and Purpose

We process your data for purposes of direct marketing, inter alia for sending marketing mailings and or newsletters. The data processing is on our interest to inform you about new products and services and share further relevant news with you that are related to our business relationship. Every data subject has a separate right to object to this type of data processing; if you exercise this right, we will stop processing your data for purposes of direct marketing. If your data is solely stored for direct marketing purposes, it will be deleted after you have objected.

Should we not have had previous business contact, we shall only contact you, if you have given us unambiguous free and informed consent.

5. Applicants

5.1. Controller

The INEOS entity that has posted the job offer, for which you are applying, is the responsible data controller. The contact information of the data controller is indicated in the job offer. Please direct any questions concerning data protection and data privacy you might have to the local contact provided for in the job offering.

5.2. Personal Data and Purpose

If you visit our career portal, we might – additionally – ask you for further personal data as part of the intake for your application. We will only ask you for data, that is indispensable in the course of your employment application.

Please note that not providing this personal data may result in us not being able to process your application. This may include but is not limited to (a) administrative data (contact details), such as title, name, address, email, telephone number and citizenship / work permit, and (b) academic and professional data (resume and cover letter) including curriculum, work history, and further information required for your application.

Please be aware that any further information you choose to share with us, is given voluntarily and may be subject to processing, the same applies to photos.

Any recruiting agency is required to make you aware of their data protection policy. If we receive your data from recruiting agencies, we treat your data as described in this section.

5.3. Use of Personal Data and Purpose Specification

Your personal data is being collected and processed for the handling of your application in consideration for employment at INEOS Solvents Germany. In other words, we process your data at your request for the purpose of taking steps towards the conclusion of a contract.

If recruited, your personal data will be transferred into your personnel file for the purpose of performing our duties as our employer. Also, in this connection, we may ask you for more personal data that we require to duly register you as an employee. Prior to that collection, we shall also provide adequate information to you.

5.4. Data Retention

Your personal data necessary to complete your employment application will, for non-recruited candidates, be erased within 24 months after the completion of the specific job offering (for legal requirements and other potential vacancies), and, for recruited candidates, be stored in your personnel file up to 10 years after the completion of your employment.

5.5. Data Recipients

The HR team and the relevant organization / department of the job offering will consider your application and thus have access to your personal data submitted for the application. Only members of our Human Resources Team, IT Support Team and colleagues are involved in the recruitment and interviewing process.

We shall especially not grant access to any of your personal data to any party outside the INEOS organisation. Since INEOS is organized in matrix organization with functional hierarchies, across company boundaries, this may mean that your application data may be accessed by persons outside the legal entity that you have applied with.

We secure our internet data transmissions with TLS encryption.

Owing to functional hierarchies and our service providers it may become necessary to grant access to persons outside the European Union. To ensure the protection of your personal data we have entered into contracts regarding the data exchange that contain EU standard clauses. These contracts help to ensure adequate level of data protection as required by data protection laws.

We will not process your personal data for any other purpose than your application unless we are explicitly required to do so by law.

6. Websites

Controller of your personal data is the INEOS Solvents Germany GmbH regarding your activities on our Site. Access to and use of our Site by you, including any entity through its employees, constitutes an acknowledgement and agreement by you that this Privacy Statement and the General Conditions of Use for this Site (the "Terms of Use") apply to such access and use and are binding on you, including the provisions contained in the Terms of Use pertaining to limited liability, indemnification, applicable law and submission to jurisdiction.

6.1. Personal Data

Some personal data is provided by you directly. Some of it is obtained by observing how you interact with this Site and INEOS' products and services. INEOS collects personal data in a variety of ways, including from web forms, technologies like cookies, web logging and software on your computers or other devices.

Visiting this Site - When you visit this Site, general information is collected automatically (in other words, not by means of registration). The web servers store the following data by default:

- The name of your internet service provider; your unique Internet protocol address
- The website from which you visited this Site; the city, state and country from which you access our website
- The web pages you visit while on this Site; the number of links you click within the site; the date and time of your visit; the web page from which you arrived to our site; the pages you viewed on the site; and certain searches / queries that you conducted via our website(s)
- And your IP address, the kind of browser or computer you use

This information is analyzed in anonymized form. It is used solely for the purpose of improving the attractiveness, content and functionality of this Site.

Registration - When you register to use our Site, you will be required to provide certain personal information (e.g., your and your company's full name, email address, mailing address, telephone number and mobile phone number). Personal data transferred to us in the context of the registration will be used by INEOS to process and fulfill orders, to notify you of the status of your orders and to provide you with other services. You may change or delete your profile within your account at any time. Personal data will then be deleted from our system automatically after max. 60 minutes, if there are no retention requirements or the personal data is not required on an individual case basis (e.g. in the case of open claims).

6.2. Purpose

INEOS uses personal data it collects to, among other things,

- communicate with you regarding orders, products, services marketing offers and security updates,
- update data files and maintain and keep customer accounts current,
- develop individualized communications, such as preparing personal catalogues or customer catalogues or making recommendations of products or services,

- improve this Site and the services offered through this Site,
- prevent or detect any misuse of this Site or the services offered through this Site and
- permit third parties to perform technical, logistical and other services.

All personal data collected by us on or through our Site is the property of INEOS Solvents Germany GmbH; INEOS will not sell any personal data pertaining to you for commercial purposes.

However, INEOS is entitled to use and disclose any personal data:

- In order to identify you to enforce, if necessary, compliance with contractual agreements with you or your company or applicable laws;
- Among INEOS' affiliates;
- As part of a merger or sale of a business;
- When required by law or to respond to legal process or lawful requests, including from law enforcement or other government agencies;
- When required to combat fraud or to protect INEOS' interests; or
- To protect life and safety.

7. Cookies [currently under review]

We use cookies on our website as described in our Cookies Policy (<http://www.ineos-styrolution.com/portal/cookie>). The personal data is processed in the interest of optimizing or enabling user guidance and improving our website presence.

Most web browsers will automatically accept cookies but can be modified to block cookies. Please be aware that if cookies are blocked, you may not be able to sign in or use other interactive features of this Site or services that depend on cookies. In addition, if cookies are deleted after leaving this Site, any settings and preferences controlled by those cookies will be deleted and may need to be recreated.

8. Google Analytics [currently under review]

In the case of Google Analytics an appropriate level of data protection is ensured by the corresponding participation in the Privacy Shield Agreement as provided for in Art. 45 para. 1 GDPR.

This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies" to help the website analyze how users use the site.

The information generated by the cookie about your use of the Site (including your IP address) will be transmitted to and stored by Google on servers in the United States. In case of activation of the IP anonymization, Google will truncate / anonymize the last octet of the IP address for Member States of the European Union as well as for other parties to the Agreement on the European Economic Area. Only in exceptional cases, the full IP address is sent to and shortened by Google servers in the USA. On behalf of the Site provider Google will use this information for the purpose of evaluating your use of the Site, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage to the website provider. Google will not associate your IP address with any other data held by Google.

You may withdraw your consent to the processing at any time. Please use one of the following options:

- You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you proceed accordingly you may not be able to benefit from the full functionality of this website.
- You can also prevent Google from collecting the data generated by the cookie and relating to your use of the website (including your IP address) and from processing this data by downloading and installing the browser plug-in available under the following link <http://tools.google.com/dlpage/gaoptout?hl=en>.
- As an alternative to opting out from being tracked by Google Analytics you can also click the following link, <https://developers.google.com/analytics/devguides/collection/gajs/?hl=de#disable> . An opt-out cookie will be stored, which means that no web analysis will take place as long as the opt-out cookie is stored by your browser.