

# LEGAL INFORMATION & PERSONAL DATA PRIVACY STATEMENT

## 1. Introduction

INEOS Styrolution of Brazil, together with other affiliates of the group, hereinafter "INEOS Styrolution", would like to inform you about the main guideline for the Brazilian management of your personal data in accordance with the LGPD (General Law of Data Protection – Brazil).

There are multiple situations, in which we process your personal data and in the following, we would like to briefly describe how we collect, process and secure your personal data. We will always indicate who is the controller for the processing operations, as, based on our company structure, various INEOS Styrolution entities may be deemed controller for different personal data processes.

Your personal data will be kept confidential and will not be shared otherwise than in accordance with the legal basis of LGPD and the Legal Information & Personal Data Privacy Statement, being possible to INEOS Styrolution 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 Styrolution's interests; or to protect life and safety.

INEOS Styrolution will not sell any personal data pertaining to you for commercial purposes.

This Legal Information & Personal Data Privacy Statement is effective 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. Definitions

For the purposes of this Legal Information & Personal Data Privacy Statement, the following definitions should be considered for better understanding:

- **LGPD:** General Personal Data Protection Law - Brazil (Law No. 13.709, of August 14, 2018).
- **Treatment of information:** All operations carried out from the collection, use, storage and deletion of personal data.
- **Legal basis:** Legal hypotheses foreseen in the LGPD that authorize INEOS Styrolution do Brasil to process personal data.
- **You/holder:** Any natural person as a visitor to the digital channels and/or user of INEOS Styrolution of Brazil services and/or responsible for a legal entity (customers and/or accredited establishments) that access or interact with the activities and/or functionalities.
- **Controller:** Natural or legal person, under public or private law, who is responsible for decisions regarding the processing of personal data.
- **Operator:** Natural or legal person, under public or private law, who handles information on behalf of the controller.

## 3. General Information for every Personal Data Processing

### 3.1. 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 are we processing your personal data, who has access to and for how long do we retain your personal data. INEOS Styrolution 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 Styrolution intranet.
- If you are our business partner (e.g. customer or supplier), please see section 4.
- If you have been addressed for marketing purposes, please see section 5.
- If you are an applicant to a job offer, please see section 6.
- If you are using our website, please see section 7.

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

### 3.3. Your Rights

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

Request access	You have the right to know whether we maintain and process your personal data and may request and obtain a copy or information of such personal data.
Request a correction	You have the right to have your personal data corrected without undue delay if they are 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.
Requeste 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, unless there are demonstrably convincing legitimate reasons for processing that outweigh the interests, rights and freedoms of the person in question, or the processing serves to enforce, exercise or defend legal actions.

<ul style="list-style-type: none"> <li>Request the restriction of the processing</li> </ul>	This right entitles you to request that INEOS Styrolution 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 Styrolution 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 according to LGPD.

### 3.4. Recipients, including Data Transfers to other countries

INEOS 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 other countries. 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, using standard contractual clauses, or other recognized means, in accordance with the LGPD. We regularly audit our processors.

### 3.5. Data Security and Automated Decision-making

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

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

### 3.6. Contact

If you have a general question about how INEOS Styrolution 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 Styrolution do Brasil Polímeros Ltda.  
Rua Quintana 887, salas 33/34, Cidade Monções, São Paulo, Brazil,  
04569-011*

*(DPO – Data Protection Officer)  
Email: [dpobrasil@ineos.com](mailto:dpobrasil@ineos.com)*

*Data Protection Coordinator  
Mainzer Landstraße 50  
60325 Frankfurt am Main  
Germany  
[susanne.albert@ineos.com](mailto:susanne.albert@ineos.com)*

You can also contact our Data Privacy Officer for INEOS Styrolution:

FIRST PRIVACY GmbH  
[office@first-privacy.com](mailto:office@first-privacy.com)  
[www.first-privacy.de](http://www.first-privacy.de)

## 4. Business Partners (Suppliers, Customers)

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

### 4.1. Controller/ Recipient

Our teams involved in processes that require the processing of personal data will share and disclose the personal data necessary to complete the objective. Given the structure of our company, this may include disclosure to other countries or international organizations. Again, as noted above, we always ensure an adequate level of data protection before granting access.

### 4.2. Personal Data and Purpose

We collect your personal data for the purpose to perform a contract with you. This comprises your business contact data such as name, business phone and business e-mail.

#### 4.2.1. Purpose and contractual obligations

We process your personal data in order to develop business relationships in accordance with established contracts, exercising our rights and obligations, 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 personal 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 Styrolution professionals based on their personal interactions with you.

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

### 4.3. 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.

## 5. Marketing

## 5.1. Controller

Controller of your personal data is the entity INEOS Styrolution 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 Styrolution.

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.

## 5.2. 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 holder 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.

## 5.3. Newsletter

On our site, we provide the opportunity to subscribe to our newsletter, to receive marketing information and other updates, provided, however you have consent to this processing separately. You can withdraw from you consent at any time without affecting the lawfulness of the prior processing. If consent is withdrawn, we will stop the corresponding data processing.

You may unsubscribe from the newsletter at any time, e.g. via email or via the unsubscribe link, which you will find in every newsletter E-Mail.

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

## 6. Applicants

### 6.1. Controller

The INEOS Styrolution 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.

### 6.2. 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.

### 6.3. 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 Styrolution. 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 your 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

### 6.4. Data Retention

Once the application process for a certain job offer has been completed, your personal data necessary to complete your employment application will, for non-recruited candidates, be erased within 3 months after the completion of the job offering, and, for recruited candidates, be stored in your personnel file.

### 6.5. Data Recipients

Only members of our Human Resources Team, IT Support Team and colleagues involved in the recruitment and interviewing process will consider your application and thus have access to your personal data submitted for the application.

We shall especially not grant access to any of your personal data to any party outside the INEOS Styrolution organization. Since INEOS Styrolution 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.

Due to functional hierarchies and our service providers, it may be necessary to grant access to persons outside Brazil. To ensure the protection of your personal data, we enter into data exchange agreements that contain standard clauses. These agreements help ensure the adequate level of data protection as required by the LGPD.

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

## 7. Websites

Controller of your personal data is the INEOS Styrolution 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 Legal Information & Personal Data Privacy Statement 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

### 7.1. 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 Styrolution's products and services. INEOS Styrolution 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.

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 or 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, email address, mailing address, telephone number and mobile phone number). Personal data transferred to us in the contest of the registration will be used by INEOS Styrolution 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)

### 7.2. Purpose

INEOS Styrolution 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 Styrolution; INEOS Styrolution will not sell any personal data pertaining to you for commercial purposes.

However, INEOS Styrolution 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 Styrolution's 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 Styrolution's interests; or
- To protect life and safety.

### 8. Cookies

We use cookies on our sites. Cookies are small text files that can be stored and read on your terminal device; on our sites, we use Session-Cookies, which are deleted as soon as you close your browser, and Permanent-Cookies, which are stored beyond the individual session. Although, in some cases, cookies only contain information on certain settings that cannot be related to a specific person, generally, tracking cookies contain Personal Data that makes it possible to recognize the device used.

**Please note: You can deactivate or restrict the transmission of cookies by changing the settings in your Internet browser. You have the possibility to delete your browser configuration at any time and prevent any use of new cookies. If cookies are deactivated for our Site, please note that our Sites may not be displayed optimally and some functions are then no longer technically available. 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.**

### 9. Google Analytics

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We use Google Analytics to create pseudonymous user profiles for improving and designing our sites on demand. Google Analytics is operated by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4. Google Analytics uses cookies, which are text files placed on your end device and can be read by us. In this way, we are able to recognize and count returning visitors. The respective processing takes place on the basis of consent (Art. 6 (1) S.1 lit. a GDPR) and in line with the E-Privacy Directive and/or the respective national implementation act.

Google Analytics uses cookies to help the site owner analyze how users use the site. It helps us measure how users interact with the site content. Google Analytics investigates, among other things, the origin of visitors, their length of stay on individual pages and the use of search engines. As a user navigates between web pages, Google Analytics provides website owners JavaScript tags (libraries) to record information about the page a user has seen, for example the URL of the page. The Google Analytics JavaScript libraries use HTTP Cookies to "remember" what a user has done on previous pages / interactions with the website.

The information generated by the cookies used by Google Analytics about your use of the site will generally be transmitted to and stored by Google on its servers in the United States. We have activated IP-anonymization on our Site, your IP address will be truncated within the area of Member States of the European Union. Only in exceptional cases, the whole IP address will be transferred to a Google server in the USA and truncated there (an adequate level of data protection according to Art. 45 para. 1 GDPR is ensured by Google's participation in the corresponding Privacy Shield Agreement). In addition, we have also concluded a data processing agreement with Google Ireland Limited in accordance with Art. 28 GDPR. Accordingly, Google will solely use personal data for the defined purpose, i.e. to evaluate your use of our Site and to compile reports on Site activities.

Google will store your personal data for 14 months. The retention period applies to user-level and event-level data associated with cookies, user-identifiers (e.g., User-ID) and advertising identifiers (e.g., DoubleClick cookies, Android's Advertising ID, Apple's Identifier for Advertisers).

In order to **withdraw your consent to being tracked by Google Analytics** within this site in the future, **you can click [here](#)**. An opt-out cookie will be stored on your device, which means that no web analysis will take place as long as the opt-out cookie is stored by your browser.

## 10. Social Media

We operate social media sites. These are currently:

- Twitter: [<https://twitter.com/Styrolution>]
- LinkedIn: [<https://www.linkedin.com/company/styrolution>]
- YouTube: [<https://www.youtube.com/user/StyrolutionGroup>]

In case further social media sites are opened this section shall apply accordingly.

### 10.1. Controller

If we receive any personal data from you via the social media sites, INEOS Styrolution, in addition to the provider of the social media platform (platform provider) are jointly responsible as controllers for the processing activities concerning your personal data.

Any personal data you provide directly on our social media sites such as comments, videos, pictures, likes, tweets etc. are published by the platform provider.

That said, the platform provider primarily determines the purposes and means of the processing activities, which we can influence only to a limited extent.

To the extent that we can exert influence over or set parameters regarding the processing of your personal data, we will design our social media sites to be as compliant as possible with applicable data protection rules.

With regards to the receipt of the statistics provided by the platform provider, this may only be influenced by us to a limited extent and we do not possess the means to deactivate them completely. However, we make sure that no additional optional statistics are made available to us.

### 10.2. Purpose

Any processing of your personal data by us on our social media sites is based on Art. 6 (1) (f) GDPR which refers to processing done in the interest of public relations and communication. As part of this processing we may:

- Communicate with you via the social media platforms;
- Share your content on any of our social media platforms

At no time is your personal data used or processed by us for any other purposes than defined herein.

We do not make use of demographic, interest-based, behavior-based or location-based target group classifications for the purposes of advertising, notwithstanding that such services may (by default) be provided to us by the platform providers.

**If you wish to object to a particular processing on our social media sites, please contact us via email (see 3.6. herein).** Following our examination of your request, we will determine whether we are able to respond to your request. If we are unable to fulfill your request using our own means, we will forward it to the appropriate platform provider.

If you send us an inquiry through the social media sites, we may also, depending on your request, refer to other secure communication channels that guarantee confidentiality. You always have the option to send us confidential inquiries via email (see 3.6. herein).

### 10.3. Data Processing by the Platform Provider

The platform provider uses web tracking methods. Web tracking may also take place independently of whether or not you are logged in or registered on our social media sites. Unfortunately, we cannot influence or restrict the web tracking methods of the social media platform.

Please be aware that the platform provider may use your profile and behavioral data to evaluate, among other things, your habits, personal relationships and preferences. We have no influence on the processing of your personal data by the platform provider.

Further information on the processing conducted by the platform provider, including information concerning your rights as a user, can be found in the provider's data protection policy:

- Twitter: <https://www.twitter.com/privacy>
- Facebook: <https://www.facebook.com/about/privacy/update>
- LinkedIn: [https://www.linkedin.com/static?key=privacy\\_policy](https://www.linkedin.com/static?key=privacy_policy)
- YouTube: <https://www.youtube.com/privacy>