

Privacy Policy

This is the Privacy Notice for Mexichem Speciality Compounds/Alphagary and its websites www.alphagary.com, www.alphagarycompuestos.com, www.sylvin.com and www.mexichemspecialtycompounds.com (hereinafter referred to as: 'Website'). This Privacy Notice only applies to personal data that Mexichem Specialty Compounds/Alphagary and its group entities (hereinafter referred to as 'Mexichem Specialty Compounds/Alphagary', 'we', 'our' or 'us') processes about you when you purchase our products or services, visit the Website and/or our premises, interact with us or otherwise make use of our services ('Services').

This statement will explain how we will use the personal data that we collect via the Services and which rights you have with respect to your personal data.

1. Personal Data Collection

Personal data is any information through which we can identify you as an individual (hereinafter: 'Personal Data'). The Personal Data we collect about you when you visit the Website or make use of our Services, and how we collect it, include the following:

A. Customer Area

In order to be able to create an account with us and/or log in to the customer area where you can browse our product portfolio, mark your favourite products and access more detailed information and samples, we collect and store your username, e-mail address and password as well as other information such as your full name, company name, telephone number or e-mail address and, in some cases, your IP address and location.

B. Website Forms

In order to be able to answer questions or comments via contact forms, we ask for your contact information, including your name, email address, telephone number, job role and your country. Your question or comment will generate an email that is sent to our enquiries mailbox. We will be expanding the list of emails that contact forms are sent to depending on the information request.

C. Newsletter

In order to be able to send newsletters, we ask for your name and e-mail address as well as your consent for us to send you marketing emails.

D. E-mail Marketing

We may collect your e-mail address and optionally also your name, initials, title and additional information like company name or a functional classification, in order to send you marketing e-mails. We will only send you marketing e-mails if you consented to receive them. You can stop receiving marketing emails at any time by clicking on the 'unsubscribe' link in any of our marketing emails or by contacting us using the contact information below.

E. Social Media

We bring our content to our target audiences via social media, where they can stay engaged with us in the environments within which our target audiences are most active. We can store engagement moments and behaviour like replies on our content or sent messages to our social media inboxes and messaging services. Information about social media behaviour can be connected to data about website behaviour and based on such information we can personalize your experience on the Website.

F. Cookies

Mexichem Specialty Compounds/Alphagary uses 'cookie' technology and other similar tracking technologies to track visitors on the Website, to collect Website usage data and to improve our Services. This includes technical information, such as the internet protocol (IP) address used to connect your computer or device to the internet, information about the device you use (e.g. operating system, model, language setting), browser type and version, and operating system and platform as well as information about your visit, such as clickstream data to, through and from our site (including date and time) and content you have viewed or searched for, duration, frequency and time of use and/or your region. For further information about the types of cookies we use, why, and how you can control cookies, please see our Policy . You can manage your cookie preferences within the Website cookie banner.

G. Additional types of data and collection

Your contract/financial details. The contract and financial information that has been disclosed to us and can be linked to you as a customer representative, such as contract information, payment method, payments made or due (including invoice details), details of authorised persons(s) on the accounts, payment transaction reference, transaction data including transaction history, your authorisation by the company you represent and, if applicable, your identity document (passport or driver's license).

Recording of video footage. When you enter our buildings or premises, you are recorded by our video surveillance systems (CCTV). You can also be recorded on

video footage during events or fairs that we organize and during which we make video footage.

- *Log of visitors at our premises.* This includes first and last name, time of arrival and departure and, if applicable, vehicle registration number.
- *Your use of our Services.* We collect information relating to your use of our Services, such as which purchases you make on behalf of your company, the amount and date of your purchase, the product or service you purchase, location of purchase, product usage, functional classification etc.
- *Your picture.* Where requested we collect your picture to identify you as a customer representative.
- *Your communication data.* Your requests, any complaints you may have and any other (engagement) data that we receive if you communicate with us via e-mail, by telephone, online or via social media.
- *Any other Personal Data.* This includes any Personal Data that you disclose to us during the course of the engagement of your organization with us, either voluntarily or upon request.

2. Legal Basis for processing Personal Data (EEA users only)

If you are located in the European Economic Area ('EEA'), our legal basis for collecting and using the Personal Data described above will depend on the Personal Data concerned and the specific context in which we collect it.

However, we will normally collect Personal Data from you only where we need the Personal Data to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. This includes our legitimate interest to promote, sell and develop our products and services including sending (personalized) marketing (such as newsletters via email) to our existing customers or otherwise engaging with our customers for marketing or commercial purposes (e.g., via email, telephone or hardcopy post), provided that you have opted-in and/or, as applicable, not opted out, to manage our internal client database ('CRM') system, to personalize our Services, to better understand you as a customer (customer optimization), assess what may interest you, measure or understand the effectiveness of advertising we serve you to deliver relevant and targeted advertising (both on our own Website and on other websites (including social media), to operate and expand our business activities and Services, and other legitimate business purposes permitted by applicable law.

To the extent that we rely 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 defence of legal claims.

We may also collect and process Personal Data to comply with a legal obligation to which we are subject or where we have your consent to do so.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided below.

3. How we might share Personal Data

To fulfill the purposes described above, from time to time we share your Personal Data with other companies that assist us in delivering our Services. These companies will have access to your Personal Data, but only when strictly necessary to perform their services. We do this on a strict need-to-know basis and we ensure that before we share your Personal Data we enter into contractual agreements with these companies. These companies are:

- Other entities within the Orbia/Alphagary group entities. we will share your Personal Data internally between the responsible Mexichem/Alphagary group entities to the extent required for internal administrative purposes, management purposes or other business related purposes as described in this Notice.
- Service Providers and Processors. We may engage third party vendors, from time to time, including:
 - Business partners, suppliers (such as IT service providers, website providers, direct messaging providers etc.) and sub-contractors for the performance of any contract we enter into with them or to provide services on our behalf;
 - Professional advisors (including, without limitation, tax, legal or other corporate advisors who provide professional services to us);
 - Financial institutions, mostly to carry out credit related investigations regarding our customers;
 - Telemarketing companies and other advertising companies that assist us or that carry out marketing activities on our behalf; and/or
 - Analytics and search engine providers that assist us in the improvement and optimisation of our Website and Services.
- Third parties in case of legal requirement. We also disclose your Personal Data if disclosure is required by law or in the context of an investigation, regulatory requirement, judicial proceeding, court order or legal process

served on us, or to protect the rights or safety of the Website, us or our affiliated companies.

- Third parties in case of a corporate transaction. In addition, information about our customers, including Personal Data, may be disclosed as part of any merger, sale, transfer of Wavin's assets, acquisition, bankruptcy, or similar event.

With consent, We also disclose information about you, including Personal Data to any other third party, where you have consented or requested that we do so.

In providing their services, they will access, receive, maintain or otherwise process Personal Data on our behalf. Our contracts with these third-party vendors do not permit use of your Personal Data for their own (marketing) purposes. Consistent with applicable legal requirements, we take commercially reasonable steps to require third parties to adequately safeguard your Personal Data and only process it in accordance with our instructions.

4. International Transfers of Personal Data

Subject to compliance with local law requirements, the recipients of Personal Data described in Section 3 may be located inside or outside your own country, in countries whose laws regarding data protection may not offer an adequate level of protection compared to the laws in your country. For example, not all countries outside the European Economic Area ('EEA') offer the same level of protection as in the EEA.

We will take all necessary measures to ensure that transfers out of your country are adequately protected as required by applicable data protection law. With respect to transfers to countries not providing an adequate level of data protection, we may base the transfer on appropriate safeguards, such as the EU standard contractual clauses adopted by the European Commission or other approved data transfer or certification mechanisms together with binding and enforceable commitments of the recipient. In each instance, we will review the transfer and ensure that any additional technical and organizational measures are put in place to ensure that an adequate level of protection is provided. You are entitled to receive a copy of any documentation showing the suitable safeguards that have been taken by making a request using the contact details provided in Section 10 below.

5. How we secure your data

We implemented appropriate technical and organizational measures to protect your Personal Data against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access and against all other forms of unlawful

processing. Also, we require our data processors to implement such appropriate technical and organizational measures.

6. Data Retention

Your data will be stored no longer than is necessary for the purposes for which the Personal Data is collected unless otherwise required by law. For example, if you delete your account, we will delete the data, unless this data is required for another purpose set out in this policy or if we are required by law to retain the data.

With respect to the specific retention periods of cookies, please check the list of cookies in our Cookie Notice.

7. Your rights

We will comply with your privacy rights consistent with all local legal requirements, including but not limited to (as applicable to you):

- Right to access Personal Data;
- Right to rectify or erase Personal Data (We are not required to comply with your request to erase Personal Data if the processing of your Personal Data is necessary for compliance with a legal obligation or for the establishment, exercise or defence of legal claims);
- Right to restrict the processing of your Personal Data;
- Right to data portability;
- Right to object to the processing of your Personal Data;
- Right to withdraw consent;
- Right to lodge a complaint with the supervisory authority in the country where you live or work or where you believe your rights have been infringed;
- Right not to be discriminated against;
- Any other right under the law applicable to you.

If you have any questions or if you wish to exercise one of your rights under applicable local privacy laws or submit any objections regarding the processing of your Personal Data, please use the contact details provided below or, dial us at + 1-800-221-6599 or + 1-978-537-8071 and specify your request.

We will respond to your request as soon as possible and consistent with applicable law. If a request is denied, the reason for the denial will be communicated within such response.

We may request additional information necessary to confirm your identity. We will provide information on the actions taken without undue delay.

8. Other Websites

Our Website may, from time to time, contain links to and from third-party websites, such as our business partners, social media networks, branch organizations and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please consult these policies before you submit any Personal Data to these websites.

9. Modifications

We will update our privacy notice as needed and the most recent version will be available at www.alphagary.com, www.alphagarycompuestos.com, www.sylvin.com and www.mexichemspecialtycompounds.com at all times. If a fundamental change to the nature of the use of your Personal Data is involved or if the change is in any other manner relevant to you, we will ensure that information is provided to you separately.

10. Notice to California Users

Under California Civil Code Section 1789.3, users of electronic commercial services are entitled to the following specific consumer rights notice: The Complaint Assistance Unit of the Division of Consumer Services of the California Department of Consumer Affairs may be contacted in writing at 1625 N. Market Blvd., Suite S-202, Sacramento, California 95834, or by telephone at (800) 952-5210.

Under the California Consumer Privacy Act or "CCPA (California Civil Code Section 1798.100 et seq.)), California residents have the right, inter alia, to request the disclosure of the categories and specific pieces of Personal Information that business has collected about them, to request the deletion of such data, request to opt out of the sale of Personal Information (where such information is sold). NVIDIA Networking does not sell your Personal Information. You may request to exercise your rights under the CCPA by submitting a request (yourself or by an authorized agent) through the contact details provided below or, dial us at 1-800-221-6599 and 1-978-537-8071. Verifiable consumers requests shall be addressed, and data will be provided in a portable format, within 45 days, subject to exceptions set out in the CCPA.

Under California Civil Code Section 1798.83, California residents can request in writing from businesses with whom they have an established business relationship: (a) a list of the categories of personal information and the type of services provided to the customer, that a business has disclosed to third parties (including affiliates that are separate legal entities) during the immediately preceding calendar year for the third parties' direct marketing purposes and (b) the names and addresses of all such third parties. To make such a request from us, if entitled, please submit a written request to the contact details provided below.

We will respond to such properly addressed written requests.

This Privacy Notice was last updated on May 1, 2023.

10. Contact us

If you have any questions or complaints, you can contact us at the below address or the following email: enquiries@alphagary.com

Alphagary / Mexichem Specialty Compounds

Attn: Marketing Department

170 Pioneer Drive

Leominster MA 01453 USA