# General Personal Data Privacy Policy







# **Definitions**

The terms listed below shall have the following meanings:

"General Data Protection Law" or "LGPD" means Law No. 13709/2018.

"Personal Data" means any information relating to an identified or identifiable individual person, or that can be directly or indirectly identified through that information.

"Treatment" means any operation performed with Personal Data, such as those referring to the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, elimination, evaluation or control of information, modification, communication, transfer, diffusion or extraction.

"Anonymization" means the use of reasonable and available technical means at the time of Management, whereby data loses the possibility of association, directly or indirectly, with an individual.



This Privacy Policy ("*Policy*") is provided by Chemyunion Ltda. ("*Chemyunion*"), headquartered at Avenida Independência, 1.501, Iporanga, Sorocaba/SP, to inform and clarify its practices related to the processing of personal data.

#### 1. First Considerations

Law 13709/2018 ("<u>LGPD"</u>), in addition to other laws and rules, defines the rights to people regarding the use of their own personal data by organizations ("<u>Applicable Law</u>"). Pursuant to the Applicable Law, the processing of personal data must be guided by a series of principles, mainly by the principle of transparency.

In order to comply with the Applicable Law and the best privacy practices, Chemyunion makes this Policy available for learning the purposes and ways of processing personal data.

We process personal data with maximum care, always in accordance with the Applicable Law, and implement efficient operational procedures to ensure compliance in the use of personal data.

#### 2. Collected and Processed Data

Chemyunion is aware that personal data must be used with responsibility and acts with transparency and strict observance of the purposes for which the processing is intended, by collecting only the data minimally necessary for it to be able to exercise its activities.

Below we listed personal data, purposes and owners of data collected and processed in our organization:

#### a) Website – Clients

- Personal data, such as name, surname, field of operation, field of education;
- Contact data, such as email, phone number, city and state;
- Corporate and interest data, such as company name, content preference etc.

Data are collected directly from the owner when he/she registers in the client area on our website.

We maintain this client registration to make contact and carry out financial, administrative and operational routines, in addition to marketing communication.

#### b) Website - Visitors

Some data from visitors who fill in the forms "contact us", "request a sample", "speak to the technical specialist" and "take a virtual tour" can spontaneously be collected through our website. Basic personal data, such as name, email, phone number, company name, CNPJ (Corporate Taxpayer ID), state and country, may be collected. In order to access multimedia material, the visitor must make the registration described in item a) Clients.



#### c) Chemyunion App - Users

- Personal identification data, such as name, surname, address, birthday and photo (the latter two are optional);
- Contact details, such as phone number and email;
- Corporate data, such as company name and content preference;
- Data on the mobile device, such as hardware model, operating system, browser, IP address, mobile network (collected automatically);
- Data related to the visualization, such as visit time in the sections and access to videos and downloads, geolocation, language, date and time of access (collected automatically).

We maintain the registration in our Chemyunion app for administration and maintenance of its platform, personalization of sections and contents for a better browsing experience, sending samples and marketing communications, in addition to making contacts and carrying out financial, administrative and operational routines.

#### **Use of Cookies**

When a person visits our website and/or app, identifiers, called cookies, are added to that visitor's browser or device, which inform us about their interaction with the pages and resources on our website and/or app. A cookie file may contain information that the website and/or app uses to interact with the visitor individually and to adapt the internet experience to their preferences.

In general, certain cookies allow the website and/or app to remember the user only during the user's visit (called "session cookies"), or allow the website to remember the user on repeated visits (they are called "persistent cookies").

Cookies can serve several purposes, such as allowing a user to efficiently navigate between pages, store preferences and, in general, improve the experience on a website and/or app. Cookies allow interaction between the website and/or app and the user more quickly and easily. They can also serve to target advertising (for example, according to location or browsing habits).

If the visitor provides contact data as part of his/her visit to the website and/or app, Chemyunion may use the cookies file to identify information about his/her activity. Information collected from cookies will be used for Chemyunion's marketing purposes.

Some Chemyunion's website and/or app pages uses cookies that allow rating the utility of information made available to visitors and analyzing effectiveness of the navigation structure.

Cookies may be primary (from the website and/or app visited) or may be set by other websites that execute content on the page visited by the user (third-party cookies).

Chemyunion's primary cookies may store personal data informed by the visitor through forms, in addition to the IP address collected by the cookies.

Chemyunion uses the following cookies on its website and/or app:

- Essential Cookies: needed to allow the navigation of the visitor in our website and/or app, as well as give access to the profile, exclusive content for registered users and other areas of the website and/or app. These cookies do not collect user information that may be used for marketing purposes nor identify where the user browsed the internet.
- Functionality Cookies: they record some information about choices made by the user and allow Chemyunion to adjust the website and/or app to the user profile.
- Analytic Cookies: they are used for the purpose of statistical creation and analysis, without collecting personal information. We use cookies from Google Analytics to collect information on how visitors use our website, their behavior on each page, products visited etc. These cookies collect aggregated data to provide us with information about how our website and/or app is being used. The IP addresses collected are anonymized by the tools themselves.
- Advertising Cookies our website and/or app may contain ads from third parties, and their relevance is adjusted to the individual user profile based on research made on websites and geographic location of the IP address.

Cookies and ad technologies, such as web beacons, pixels and social media tags help to deliver relevant ads more effectively. They also help us collect aggregate data for the purpose of research and performance reporting for advertisers. Pixels make it possible to understand and improve the offer of ads to users, as well as to identify when certain ads have already been shown to a particular user.



We use (i) necessary and analytical cookies to improve the visitor experience on our website and/or app and allow us to offer a more efficient service; and (ii) from third parties, for advertising purposes.

The visitor can refuse or disable cookies on their browser settings. However, some interactions on our website and/or app may not work properly if the cookies are disabled.

When navigating on our website and/or app, the owner will have access to third party platforms through specific links (Facebook, Instagram, YouTube, for example) that may collect/process personal data and on which we have no interference. Therefore, we recommend reading these third parties' privacy policies.

### 3. Sharing with Third Parties

When carrying out its legitimate activities, Chemyunion may share personal data with third parties/partners for the purpose of storing and managing databases, such as media agencies and suppliers of automated digital marketing tools.

Chemyunion has a solid data privacy governance program, and under no circumstances does it trade personal data, or share it with third parties, without a legitimate purpose or in breach of Applicable Laws.

#### 4. Data retention time

Unless specifically stated in this Policy, in general, personal data processed by Chemyunion remains stored for the time of the holder's relationship with our organization, or for the time necessary for Chemyunion's legitimate purposes as data controller. Personal data that is relevant to legal and accounting obligations will be retained for the time necessary in accordance with Applicable Law.

# 5. Information Security

Chemyunion stores personal data on its own- and third-party servers, with a thorough commitment to security and making the necessary effort to preserve the integrity and privacy of personal data.



We seek to adopt modern technical and administrative measures, able to protect personal data from unauthorized access and accidental or unlawful situations of destruction, loss, alteration, disclosure or any form of inappropriate or illicit processing.

#### 6. Exercise of rights in relation to personal data

In addition to other rights provided for in Article 18 of LGPD, any owner has the right to request confirmation of the existence of processing on their data, as well as access to them. They may also request the correction of data that may occasionally be wrong or outdated.

The right to demand the anonymization, blocking or deletion of personal data that proves to be unnecessary or which treatment, for whatever reason, is considered irregular, is also ensured.

# 7. Exercise of rights in relation to personal data

To contact Chemyunion regarding the processing of data, please send an email to the Data Protection Officer (DPO), Renato D'Addio: <a href="mailto:dataprotection@chemyunion.com">dataprotection@chemyunion.com</a>. The deadline for this service will be a maximum of 15 (fifteen) days.

When contacting us, aiming at the security, confidentiality and inviolability of the data, we may request additional information or go through a procedure of identity confirmation.

# 8. Revision of the Privacy Policy

The terms of this Policy may be updated or adapted from time to time to reflect our activities, as well as to always comply with the applicable Law and best practices.

February 2021



chemyunion.com