

Global Data Protection Policy

Armacell Group

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The protection of your personal rights when processing personal data is important to Armacell. With the following information, we would like to give you an overview of how your personal data is processed by Armacell and your related data protection rights. Which data is processed and how it is used depends largely on your individual interests and the agreed contractual services. Therefore, not all parts of the information below may apply to you.

Armacell (hereinafter also referred to as “we” or “the company”) processes your personal data in accordance with the legal regulations and is the controller as the responsible party within the sense of data protection laws.

To the extent that another group company of the Armacell Group, alone or together with others, decides on the purposes and means of the processing of personal data, this company is (also) considered to be the controller.

Our Privacy Policy explains what we do with any personal information which we collect from you, including when you use our website and when you interact with us in other ways. If you have any questions regarding our Privacy Policy, please contact us under the contact details provided in Sec. 8 below.

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1. Types of personal data +

The personal information we collect from you is used primarily to enable us to provide the specific service you require, securely.

Personal information can include the following:

- Your title, forename and surname;
- Your personal or work related e-mail address;
- Your personal or work related contact details such as your telephone number(s), fax numbers and postal address;
- Employer details and occupation;
- Your contact and marketing preferences;
- If you take a survey or interact with us in various other ways, demographics information and information about subjects that may interest you;
- Information necessary for legal compliance; and/or
- Your electronic identification data such as Internet Protocol (IP) address, website connection history and website journey.

This information will be collected primarily from you as information voluntarily provided to us. We may also collect personal information about you from your use of other company or group websites or services. If information is collected via social networking websites, the privacy policy of the respective social network applies.

2. Our purposes for processing your personal data +

We need certain categories of personal data in order to provide you with our products and services. Other personal data is processed for our Legitimate Interests or based on your consent.

This will include (as relevant):

- Processing your personal information so that we may perform our obligations under a contract with you;
- Processing for legitimate interests provided these are not overridden by your interests and fundamental rights and freedoms (this includes our own legitimate interests and those of other entities in our group of companies);
- Processing which is necessary for compliance with our legal obligations laid down by laws (where relevant);
- Your consent may also be a lawful reason for processing your personal data in certain cases. This means your freely given, specific, informed and unambiguous consent which may be collected from you. You should be aware that you are entitled under Data Protection Laws to withdraw your consent where you have given it to us at any time. If you do this and if there is no alternative lawful reason for us to rely on to justify our processing of your personal data, this may affect our ability to provide you with some of our services.

(a) processing of personal data related to your business relationship with us (customers and interested parties) +

We process your personal data (provided that this data relates to you as a natural person and not only to the company that you represent) based on the following legal bases and for the following purposes:

1. to fulfil pre-contractual and contractual obligations and to initiate a contract:
 - Contract processing (including shipping, after-sales, complaint management)
 - Communication with business partners regarding products, services and projects as well as answering enquiries (especially within the context of customer service)
 - Management of customer and supplier relationships, distributor support
 - Tender preparation
 - Processing orders (e.g., filling out order forms, payment processes, payment options, delivery and service terms and conditions, compliance with legal obligations, accounting, bookkeeping and auditing, internal cost and performance calculation, controlling and implementing receivables management)
 - Product delivery
 - Product training
2. as part of the balancing of interests. If necessary, we may process your data beyond the actual fulfilment of the contract to safeguard our legitimate interests or those of third parties (e.g. customer care and improvement of the customer relationship as well as the products, contract-related advertising, prevention of fraud and payment defaults):
 - Existing customer advertising, after sales marketing (e.g. product training, sending newsletters, product brochures, surveys)
 - Quality management
 - Company reporting
 - Settling legal disputes, contract enforcement and assertion, defense and exercise of legal claims, as well as the detection and prosecution of fraudulent and other illegal acts
 - Processing our logistics/materials management
 - Ensuring compliance with legal or contractual requirements
 - Entries in the CRM platform: Customer relationship management
 - Market analysis and identification of new customers (e.g., creation of market analyses, trade fair participation, Internet presence, customer events, competitions and other promotional campaigns)
 - Reporting (e.g., for data quality, control and planning purposes), reporting on and planning sales figures
 - Optimizing production processes
3. subject to your consent
 - Credit checks
4. Sending email advertising to fulfil legal obligations:
 - Compliance with retention requirements, ensuring compliance requirements through audit procedures (e.g. sanction list scanning, money laundering)

(b) processing of personal data related to your business relationship with us (suppliers) +

1. To comply with pre-contractual and contractual obligations and to initiate a contract:
 - Requests for proposal
 - Processing orders (e.g., filling out order forms, payment processes, payment options, delivery and service terms and conditions, compliance with legal obligations, accounting, bookkeeping and auditing, internal cost and performance calculation, controlling)
 - Product delivery
2. As part of the balancing of interests. If necessary, we may process your data beyond the actual fulfilment of the contract to safeguard our legitimate interests or those of third parties (e.g. supplier management and improvement of the supplier relationship):
 - Market analysis and identification of new suppliers
 - Reporting (e.g., for data quality, control and planning purposes), reporting on and planning performance indicators
 - Optimizing delivery processes
3. Subject to your consent
4. To fulfil legal obligations:
 - Compliance with retention requirements, ensuring compliance requirements through audit procedures (e.g. sanction list scanning, money laundering, reporting to (tax) authorities)

(c) processing of personal data related to your use of our websites, applications and online services +

1. As part of the balancing of interests. If necessary, we may process your data beyond the actual fulfilment of the contract to safeguard our legitimate interests or those of third parties (e.g.):
 - We automatically collect standard internet and website log information to understand how our website visitors behave, which we use to improve your experience online. This may include information about your Internet Service Provider, your operating system, browser type, domain name, the Internet Protocol (IP) address of your computer (or other electronic Internet-enabled device), your access times, the website that referred you to us, the web pages you request and the date and time of those requests, the type of device you used.
 - Our collection of website use information may also involve the use of cookies and Web beacons. Please see our Cookies Policy in Section 3 for more information.

- When you use any of the services below, you may need to provide us with some additional personal information so that we can liaise with you in order to deal with your request or query. If you do choose to provide us with your personal information, we will collect that information for the use and the purposes described in this notice.

2. Subject to your consent:

- Sign up to receive our various newsletters by email or generally be notified of products and/or services that may be of interest to you.

3. To fulfil legal obligations:

- We may also record phone conversations to offer you additional security, resolve complaints, for staff training purposes and to improve our service standards.

3. Cookies and Web Analysis +

What are Cookies?

We and our partners use so-called “Cookies” to fashion our website in a most user-friendly way and to enhance the relevance of advertisements for the users of our website. Cookies are small files stored on the user’s device. They allow the storage of information for a determinate period of time and the identification of the user’s device. For this purpose, also tracking-pixel might be used that are not stored on the user’s hard drive, but that may in the same way help to recognise a user’s device. When using the term “Cookie”, this refers to Cookies in the technical sense, as well as tracking pixel and other technologies.

When you visit our website for the first time, the entry page will show information on privacy and respective wording regarding the consent to the use of Cookies. You can decide which cookie categories you want to accept and such consent will be stored in your browser (in the form of a Cookie), so that the information does not have to be repeated on every page of our website. Should the consent be missing in your browser (e.g. if you deleted your browser history) the privacy information will appear again the next time you visit our website.

What Cookies do we use on what legal basis and for how long?

On this website we use three types of Cookies: (1) Cookies required for technical purposes, without which the functionality of our website would be reduced, (2) optional Cookies for analytics, and (3) optional Cookies for targeting and advertising purposes, generally set by third-party providers:

Cookies required for technical purposes

These Cookies are indispensable if we want to ensure proper functioning and easy navigation of our website. They may store your consent/non-consent to the use of Cookies and your selected Cookie settings. Such Cookies do not collect any information about you for marketing purposes and do not record the sites you visit when surfing the internet. A deactivation of this type of Cookies would reduce all or part of the functions of the website.

These Cookies are specifically set for individual sessions and expire when you leave the website and end the session.

Cookies for analytics / Google Analytics

Analytics Cookies gather general information on how users use a website, e.g. which pages they visit most frequently and whether they receive any error messages from websites. These Cookies do not collect any data that may lead to an identification of the user. The data collected with these Cookies will not be merged with any other information on the visitors of our website. All information collected with the aid of such Cookies exclusively serves the purpose to comprehend and improve the functionality and services of the website.

This website uses Google Analytics, a web analysis service of Google Inc. ("Google"). The information regarding your usage of this website generated by the use of Google Analytics is transmitted to and stored on a Google server in the US. However, due to the activated IP anonymisation on this website, Google will previously abbreviate your IP address. Only in exceptional cases will a full IP address be transmitted to a Google server in the U.S., where it will then be shortened. The IP address transmitted by the browser of the user will not be merged with any other Google data.

Google will use this information on our behalf to analyse the usage of our online offer by users, to compile reports on the activities regarding the use of the online offer, and to render further services to us in connection with the use of our online offer and internet usage. In this context, pseudonymous user profiles may be created from the processed data.

Users can prevent the storage of Cookies by adjusting the setting of their browser accordingly; moreover, users can prevent that the data generated by the Cookie on their use of the online offer is transmitted to and processed by Google by downloading and installing the browser plugin available at: <http://tools.google.com/dlpage/gaoptout?hl=en>. The data collected by the use of such Cookies will be anonymised prior to analysis. You can deactivate or delete Cookies and the information stored therein at any time.

Targeting and advertising Cookies

Targeting and advertising Cookies are used to better customise advertisements to your interests. They limit the number of times the same advertisement is shown to you, evaluate the efficacy of an advertising campaign, and analyse how the viewing of a certain advertisement influences the conduct of individual users. Such Cookies are usually placed by advertising networks with the consent of the respective website operator (in this case us). They register a user's visit of the website and either pass such information on to other entities, e.g. advertising companies, or directly adapt advertisements accordingly. Frequently, they are linked to certain website functions provided by such third companies. We use these Cookies to provide the advertising networks used by us with information about your visit so that, based on your browsing behaviour, you will be shown exactly such advertisements as may potentially interest you. Also in these cases the data collected via such Cookies will not be merged with any other information on the visitors of our website.

You can deactivate or delete Cookies and the information stored therein at any time (see below).

Deactivation of Cookies for analysis, targeting and advertising

A deactivation of this type of Cookies for analysis, targeting and advertising purposes does not reduce the functionality of our website. The Cookies of this type presently used by us are offered by the following providers, to whom you may refer for information on /description of the respective Cookies or if you wish to object to their use:

Google Analytics

Data privacy information : <https://policies.google.com/privacy?hl=en>

Possibility to opt-out : <https://support.google.com/ads/answer/2662922?hl=en>

If you would rather receive information about these Cookies directly from us, please contact us directly.

How can I deactivate Cookies?

If you wish to generally deactivate analytics, targeting and advertising Cookies, you may deactivate individual Cookies by clicking on one of the links in the above table (opt out). Finally, you may prevent the use of any Cookies whatsoever by adjusting the settings in your browser accordingly. We wish to point out, however, that in such case the functionality of our website will be reduced if also Cookies required for technical purposes are blocked.

Links to other websites

We use links to other internet presences of us on websites and services of third parties, e.g. to social media channels. These third parties are exclusively responsible for the data processing by such other service providers on their websites and their data protection notices apply.

4. Disclosure, transfer and making available or personal data to third parties +

Your personal information will be made available within the company for the purposes mentioned above (or as otherwise notified to you from time to time), on a 'need-to-know' basis and only to responsible management, accounting, legal, logistics, audit, compliance, information technology and other corporate staff who properly need to know these details for their functions within the company. Please note that certain individuals who will see your personal information may not be based at the group or in your country (please see below).

We may share personal information within the group as needed for reasonable management, service offering, order or customer request fulfilment and for use by those companies for the other purposes described in this notice.

Your personal information may also be made available to third parties (within or outside the company or group) providing relevant services under contract to the company, or the group (see below for further details) to help us provide our services and products to you. Third parties in this context means other corporate entities within the group, providers to the company or group of responsible management, accounting, legal, logistics, audit, compliance, information technology, marketing and other services. This may also include providers of data storage and database hosting services, IT hosting and IT maintenance services. These companies may use information about you to perform functions on our behalf.

We may disclose specific information upon lawful request by government authorities, law enforcement and regulatory authorities where required or permitted by law and for tax or other purposes. Your personal information may also be made available to third parties or partners where necessary as part of any restructuring of the company or sale of the company's business or assets. Personal information may also be released to external parties in response to legal process, and when required to comply with applicable laws and regulations, or to enforce our agreements, corporate policies, and terms of use, or to protect the rights, property or safety of the company, our employees, agents, customers, and others,

as well as to parties to whom you authorize the company to release your personal information.

We will not sell your personal information to any third party other than as part of any restructuring of the company or group or sale of a relevant group business.

We may disclose specific information about you upon lawful request by government authorities, law enforcement and regulatory authorities where required or permitted by law.

We have explained above how your personal information may be shared outside of the company and the group. As part of this, including for instance where we work with service providers, your personal information may be transferred to countries outside your country which do not have equivalent standards of protection under their legislation and on these occasions we take other steps to protect the data as required under Data Protection laws. When we do transfer your data outside your country, we ensure that any party with access to your information has implemented the necessary security and privacy measures, to ensure that your personal data is kept secure and confidential as outlined in this policy. You may obtain more details and a copy of the appropriate or suitable safeguards we employ by contacting us under the contact details provided in Sec. 8.

5. Retention periods +

Unless indicated otherwise at the time of the collection of your personal data (e.g. within a form completed by you), we erase your personal data if the retention of that personal data is no longer necessary

- (i) For the purposes for which they were collected or otherwise processed, or
- (ii) To comply with legal obligations (such as retention obligations under tax or commercial laws).

If you would like further information about our data retention practices, please contact us under the contact details provided in Sec. 8.

6. Security +

To protect your personal data against accidental or unlawful destruction, loss, use, or alteration and against unauthorized disclosure or access, we use adequate physical, technical and organizational security measures.

7. Your rights +

You have the right of access to your personal data and information, the right to rectification, the right to erasure, the right to restriction of processing, the right to notification and the right to data portability.

In addition, you have the right to lodge a complaint with a data protection supervisory authority if you consider that the processing of personal data relating to you is unlawful. The right to lodge a complaint is without prejudice to any other administrative or judicial remedy.

If the processing of data is based on your consent, you are entitled to revoke your consent to the use of your personal data at any time. Please note that the revocation only applies to the future. Processing that took place before the revocation is not affected. Please also note that we may need to store certain types of data for a certain period of time to comply with legal requirements.

Insofar as the processing of your personal data takes place in order to protect legitimate interests, you have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you. We will then no longer process this personal data unless we can demonstrate compelling legitimate grounds for processing it. These grounds must override your interests, rights and freedoms, or the processing must serve to establish, exercise or defend legal claims.

In order to make use of any of the rights mentioned above, please contact us under the contact details provided in Sec. 8.

With regard to such requests, kindly provide us with relevant information to take care of your request, including your full name and email address so that we can identify you. We will respond to your request as soon as possible and no later than within one month.

8. Data Privacy Contact +

If you have a request or a question regarding our processing of your personal data or this Privacy Statement in general, please contact us:

Armacell Group

Group Legal Affairs

e-mail: dataprotection@armacell.com

9. Changes to this notice +

We keep this notice under regular review. We may change this notice from time to time by updating this page in order to reflect changes in the law and/or our privacy practices. The date at the top of this notice will be updated accordingly and we encourage you to check this from time to time for any updates or changes. Where you have provided us with your email address, we may also contact you to let you know that we have updated the notice. We may also take that opportunity to ask you if you would like to update your marketing preferences.

This notice does not extend to your use of, provision of data to and collection of data on any website not connected to us to which you may link to by using the hypertext links within our websites.