

PRIVACY POLICY

Pursuant to art. 13 of European Regulation 679/2016 regarding the protection of individuals' personal data handling, as well as the free circulation of data in abrogation of Directive 95/46/CE (hereinafter the "**Regulations**" or "**GDPR**"), we hereby give notice that the Controller of the personal data handling as communicated by the user or otherwise obtained through use of the web site <http://www.italmatch.com> and associated sub-domains (hereinafter the "**Site**") is **Italmatch Chemicals S.p.A.**, with registered address in Arese (MI), Via E. Vismara, 114 – 20044, Tax code and Milano Monza Brianza Lodi Business Register ref. 13471010150, VAT ref IT 13471010150 (hereinafter "**Company**" or "**Controller**").

The presence of the information included in the page footer guarantees that the user is in the company's page.

1. TYPES OF PERSONAL DATA PROCESSED

1.1. Browsing data

- a. The computer systems and software procedures used to operate the site, during normal operation, acquire some personal data whose transmission is implicit in the communication protocols of the Internet or is used to improve the quality of the service offered. This information is not collected for the purpose of associating it with identified users but, by its very nature, could in the course of the processing and association enable users to be identified.
- b. This category of data includes IP addresses or domain names of computers used by users who connect to the site, addresses in URI notation (Uniform Resource Identifier) of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and computer environment.
- c. This data is used solely to compile anonymous statistics on the use of the Website and to verify that the IT system is working correctly. Personal information may also be used to determine liability in the event of possible computer crime or in the event of any damage attributable to the Company or third parties.

1.2. Data provided voluntarily by the user

- a. Users are not obliged to provide personal information in order to visit the site. Notwithstanding the above, contacts between users and the Company through the authentication services of the website and filling out contact forms, sending e-mails, messages or any type of communication to the addresses listed on the site, does involve the consequent acquisition of routine personal data, such as but not limited to name, address, email and phone number, Company, as well as any other personal data as may be provided by the user spontaneously in their interaction with the Company through the Site.
- b. Specific information will be provided or displayed on pages of the site offering specific services.

2. PURPOSE AND LEGAL BASIS FOR THE DATA PROCESSING

- 2.1. Personal data may be collected and processed for the following purposes:
 - a. for registration and access to restricted areas of the Site, where envisaged;
 - b. to handle requests for information relating to the user;
 - c. to comply with the Company's legal obligations;
 - d. to collect information regarding the use of the Site (such as frequency of use, statistics, etc.) through the use of *cookies* (see "*Cookie Policy*" section below);
 - e. sending of commercial communication, offering of products or services, sending of advertising material/commercial newsletters, telemarketing, concerning products or services offered by the Controller, including the personalised ones, through paper mail, telephone or mobile phone or other remote communication systems (sms, e-mail, fax, push notifications, etc.).
- 2.2. In relation to the purposes mentioned under points a., b., c., the personal data provided is mandatory and does not require the user's consent. Any refusal to provide data may make it impossible for the company to provide the service requested, to comply with legal obligations and to respond to and give feedback to user requests. Providing personal information through the contact forms on this site is not a legal or contractual requirement; however, the fields marked with an asterisk are required fields, as this information is necessary to fulfil the user's request.
- 2.3. The processing of personal data for the purposes of point d. and e. requires consent; providing such information is optional, and refusal will not have any consequences.

3. DATA PROCESSING AND STORAGE METHODS

- 3.1. As part of the Company's organizational structure, personal data will be processed by persons authorized to process acting under the authority of the data controller, duly trained by the controller, mainly using electronic systems in accordance with the principles applicable to the processing of personal data pursuant to art. 5 of the Regulations.
- 3.2. Your data will be kept for the period necessary to fulfil legal obligations.
- 3.3. The period of retention of personal data depends on the purposes for which they are treated and as such may vary. The criteria used to determine the applicable retention period are as follows: the retention of personal information covered by this privacy statement will be long enough (i) for the management of the contractual relationship with the user, (ii) for the management of complaints or specific requests, (iii) to enforce rights in court and (iv) for the time period required by applicable laws.

4. COMMUNICATION, DISSEMINATION AND TRANSFER OF PERSONAL DATA

- 4.1. Personal data will not be disseminated and may be communicated to other companies in the group, the competent authorities or public or private entities to comply with legal obligations.
- 4.2. The personal data collected may be processed by third party providers, as data processors in connection with the services provided on behalf of the Company on the basis of suitable contractual arrangements, for occasional maintenance and whenever necessary to perform the services specifically requested.
- 4.3. If the personal data collected by the data processors under 4.2 are transferred to countries outside the European Union, appropriate measures will be used, such as the prior signing of standard contractual clauses of the European Union, to ensure that personal data are processed in accordance with the European level of data protection.

5. DATA SUBJECT'S RIGHTS

- 5.1. The Data Subject may exercise, in relation to the processing of the data as referred to herein, the rights covered by the Regulations (arts. 15-21), including the following:
 - a. to receive confirmation of the existence of personal data and access its content (rights of access);
 - b. to update, modify and/or correct their personal data (right of rectification);
 - c. to request the cancellation or limitation of processing of data processed illegally, including data which does not need to be kept for the purposes for which it was collected or otherwise processed (right to be forgotten and right to limitation);
 - d. to object to the processing (right of objection);
 - e. to revoke consent, where given, without prejudice to the lawfulness of the treatment based on the consent given prior to the revocation;
 - f. the data subject may also make a complaint to the Supervisory Authority in the event of violation of the regulations regarding the protection of personal data;
 - g. to receive a copy of the data relating to them in electronic format, and to request that such data be transmitted to another data controller (right to data portability).
- 5.2. The afore-mentioned rights may be exercised by giving written notice by registered mail with return receipt to the address in via Magazzini del Cotone 17, Modulo 4, 16128 Genoa.
- 5.3. To exercise such rights, please contact the Data Controller.

6. NAME AND CONTACT DETAILS OF THE DATA CONTROLLER

- 6.1. The Data Controller of the personal data is Italmatch Chemicals S.p.A., with registered office in with registered address in Arese (MI), Via E. Vismara, 114 – 20020, Tax code and Milano Monza Brianza Lodi Business Register ref. 13471010150, VAT ref IT 13471010150, in the person of the legal Representative *pro-tempore*.

7. COOKIE POLICY

- 7.1. Use of cookies
 - a. Cookies are small text files sent to and stored on the computer or mobile device of each user who visits the site. These are then retransmitted to the same sites on the next visit. There are several types of cookies, which use different features and functions. The cookies of a session are automatically deleted when the user closes the browser, the permanent cookies remain on your device until a predetermined date.
 - b. The site <http://www.italmatch.com> uses some cookies to make our services easier to navigate and use efficiently their web pages. Cookies also enable improvement of the service provided to users by making more effective use of the site and/or by enabling certain features.
- 7.2. Cookies used
 - a. The site uses cookies to track browsing activity on the Website and for statistical purposes. In particular, technical cookies are used to allow users to use the services requested through our Website. Without these cookies, it would not be possible to provide the services requested. For example, technical cookies can be used to remember any user actions when you return to the previous page of a session. they can also be used to collect information on the number of users and how they visit the Site.
 - b. The site uses the Google Analytics service provided by Google, Inc. (hereinafter "**Google**") to generate site usage statistics; Google Analytics uses cookies (not third- party) which do not store personal information. The information derived from cookies on Website use by users (including IP addresses) will be sent from the user's browser to Google, with headquarters at 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States, and stored on the company's own servers.
 - c. By using this Website, you consent to the processing of data by Google in the manner and for the purposes stated above.
 - d. According to the [terms of service](#) in place, Google will use this information, as autonomous Data Controller, for the purpose of tracking and evaluating use of the Site, compiling reports

on Site activities by Site users and providing other services relating to Site activity, connection modes (mobile, pc, browser used, etc.) search methods and how the Site pages are accessed. Google may also disclose this information to third parties where required by law or where the third parties are processing the above information on Google's behalf. Google will not associate IP addresses with any other data held by Google.

- e. To see Google's privacy policy relating to Google Analytics, go to www.google.com.
 - f. To see Google's privacy policy, go to www.google.com.
 - g. Cookie tracking can be disabled without affecting the portal browsing: to disable them, see the next section "How to disable cookies by configuring the browser (opt-out)".
- 7.3. How to disable cookies
- a. You can refuse consent to the use of cookies by selecting the appropriate setting on your browser. Unregistered navigation on the site will still be available in all its features.
 - b. Below are the links explaining how to disable cookies for the most popular browsers (for other browsers we recommend using the Help option in the software).
 - i. **Internet Explorer:** windows.microsoft.com
 - ii. **Google Chrome:** support.google.com
 - iii. **Mozilla Firefox:** support.mozilla.org
 - iv. **Opera:** help.opera.com
 - v. **Apple Safari:** support.apple.com
- 7.4. To disable only the Google Analytics cookie
- a. Alternatively, it is possible to disable just the Google Analytics cookies, using the link: <http://www.google.com/analytics/learn/privacy.html?l=CZ>.
 - b. Each user can selectively disable the Google Analytics processes by installing the opt-out component provided by Google on its browser, using the link: <https://tools.google.com/dlpage/gaoptout>.
- 7.5. To clear cookies already stored on the Terminal
- a. Even if permission to use cookies by third parties is withdrawn, prior to withdrawal cookies may have been stored on the user's terminal. For technical reasons these cookies cannot be deleted, However the user's browser privacy settings does allow for their deletion. The browser options contain the "clear browsing data" option, which can be used to eliminate cookies, data from sites visited by the user and plug.

This Policy is reviewed regularly (at least every two years) and on as needed basis in case of regulatory changes and/or compliance needs.

Legal & Compliance department is in charge of monitoring the implementation of this Policy, without prejudice to ask for support of others relevant departments on as needed basis.

This Policy is applicable to Italmatch Chemicals Spa and its subsidiaries¹.

Release May 2024

¹ "subsidiaries" are all the companies and/or entities directly or indirectly controlled by Italmatch Chemicals S.p.A., where "control" means the direct or indirect ownership of at least 50% of the capital or voting rights.