



## Huntsman Online Privacy Notice Last Updated: August 30, 2023

### 1. Our commitment to privacy.

We at Huntsman International LLC and our affiliates and subsidiaries (collectively, "Huntsman") respect your concerns about privacy. This Huntsman Online Privacy Notice ("Privacy Notice") applies to personal information ("Personal Data") we collect of third parties including information collected on [www.huntsman.com](http://www.huntsman.com) and [www.huntsmanservice.com](http://www.huntsmanservice.com), through the ECHO customer portal and any other Huntsman internet sites (collectively, the "Sites"), and describes how we use the Personal Data, with whom we share it and the choices available to third parties and users of our Sites regarding our use of their Personal Data. This Privacy Notice also describes the measures we take to protect the security of the information and how users can contact us about our privacy practices. This Privacy Notice applies to the majority of our Sites; however, there may be occasions where there is a need to have a different privacy notice. As you visit other Sites, please check the privacy notice of each website that you visit as it may differ from this general Privacy Notice.

We strongly urge you read this Privacy Notice and make sure you fully understand our practices in relation to Personal Data before you access or use any of our services. Where you have read this Privacy Notice but would like further clarification, please contact us at [privacy@huntsman.com](mailto:privacy@huntsman.com).

### 2. Important information.

- 2.1 The purpose of this Privacy Notice is to provide you with a clear explanation of what Personal Data we collect, when, why and how we collect, use and share your Personal Data and it explains your rights. This Privacy Notice is not intended to override the terms of any contract you have with us, nor any rights you might have under applicable data privacy laws.
- 2.2 Note that our Sites contain links to third-party websites for your convenience and information, which we are not responsible for. Please review the privacy policies of such third-party websites should you visit these websites. This Privacy Notice does not address the privacy or information practices of any third parties. To the extent any linked websites are not owned or controlled by us, we are not responsible for the content, use, or the privacy practices of the websites.
- 2.3 Our Sites use cookies and other tracking technology to automatically collect certain data concerning interactions with visitors. Some of this information may include Personal Data. We explain more about the information we collect using cookies and tracking technology in paragraph 10.
- 2.4 Protecting the privacy of the very young is especially important. For that reason, we never collect or maintain information on our Sites or offline from those we actually know are under 13, and no part of our Sites are structured to attract anyone under 13. Parents

and guardians should supervise their children's activities at all times. If we learn we have collected or received Personal Data from a person under 13, we will delete that information. If you believe we might have any information from or about a person under 13, please contact us at [privacy@huntsman.com](mailto:privacy@huntsman.com).

**3. What Personal Data do we collect and how do we collect it.**

3.1 Personal Data is data which relates, directly or indirectly, to an identified or identifiable natural person. Personal Data is collected when you voluntarily submit it through a Sites' form or if you provide it to us through some other method or register with or use one of our Sites or online services. In addition, our Sites automatically collect certain data concerning interaction with visitors that facilitate operation, management and planning. Some information that may constitute Personal Data (such as your browser type, operating system, IP address, domain name, number of times you visited the Sites, dates you visited the Sites, date and time of an online request, the time required to download information you requested, error codes generated while your browser is in contact with our Sites and the amount of time you spent viewing the Sites) will be collected via cookies and other tracking technologies. Aggregate information (such as how many times visitors log onto our Sites) will also be collected. We explain more about our use of cookies and tracking technologies in paragraph 10.

3.1.1 If you register or contact us as an individual, we will collect your name, email address, telephone number, address (or only city) and some other information so we can adequately follow up on your request (together, "identification data"), login credentials, and possibly some information about the device you use to access our Sites or online services ("device data").

3.1.2 If you register or contact us on behalf of a company, we will collect company identification data, business contact information, login credentials, identification data from the company representative and device data.

3.1.3 We will also collect other Personal Data you provide through the Sites, including through comments or questions fields.

3.1.4 Information you submit through our Careers page is subject to a separate privacy notice as its Personal Data of our employees / contractors.

3.2 If you contact us by other offline methods in order to buy our products or services or by using one or more of the contact means provided offline, we will collect identification and payment data as relevant for the sale and delivery of the goods and services or to respond to your query or complaint and, as far as necessary, for the handling and fulfilment of the order and ongoing provision of our services.

3.3 If you engage with us through social media e.g. Facebook, LinkedIn, Twitter, we collect any Personal Data you voluntarily provide. If you upload content, including your Personal Data, to a social network and then tag our Sites, your submission will be subject to that social network's terms of use and privacy notice, even where you post on an

official Huntsman page on the social network. We do not have control over these terms of use and privacy policies and have not reviewed their adequacy. You should therefore review these before submitting any Personal Data.

#### **4. How do we use your Personal Data.**

##### **4.1 To communicate with you:**

We use your Personal Data to respond to your queries and/or complaints about our products or services or any other query you send to us through the contact form and verify your identity where required. This could also include requests for investor kits, financial information, or other corporate information about Huntsman. We may also communicate with you about, and administer your participation in, special events, conferences, programs, surveys and market research.

##### **4.2 To provide our products and services:**

4.2.1 We collect Personal Data in order to offer our products and/or services and their functions. We will use the information collected in order to validate your order or subscription, to process your payment and to provide the products and services that you requested, ordered or to which you subscribed. We will also use your Personal Data as far as necessary for the handling and fulfilment of your order as well as to provide customer support.

4.2.2 We also use this information for customer management purposes, to maintain our relationship with you, with a view to providing a stellar customer experience. This could also include establishing and servicing an account, such as resetting a password.

##### **4.3 For internal business purposes such as:**

4.3.1 to improve our products in order to make them fit for our customers' needs and to draw insights in relation to possible improvements; or

4.3.2 to improve our services to you and customize your browsing experience. Some of the information (particularly the information collected by cookies and other tracking technology) helps us improve our Sites; or

4.3.3 to track any fraudulent activities and other inappropriate activities and monitor content integrity on our Sites; or

4.3.4 to investigate suspected or actual illegal activity or to prevent physical harm or financial loss; or

4.3.5 to support the sale or transfer of all or a portion of our business or assets (including through bankruptcy); or

4.3.6 to establish, exercise or defend legal claims including in connection with business-related demands or litigation.

**5. Carrying out direct marketing.**

5.1 We may use your Personal Data, including information related to your order, such as your address, for direct marketing purposes. We may for example send you emails to inform you of news and updates about our products and services. This may be in the form of email, post, SMS, telephone or targeted online advertisements. Where required by law, we will obtain your consent prior to sending you such marketing information.

5.2 To protect your privacy and ensure you have control over the use of your Personal Data, we will always give you the opportunity to “opt out” of direct marketing, and/or withdraw your consent if prior consent is required under applicable laws, when you contact us in relation to a product or service or you receive any email, text or other direct marketing communication.

5.3 You have a right to prevent direct marketing of any form at any time - this can be exercised by following an opt-out link attached to the communication, by sending an email to [privacy@huntsman.com](mailto:privacy@huntsman.com), or by completing a Data Subject Access Request at <https://www.huntsman.com/privacy/data-request>.

5.4 Based on the information we have about you, we take steps to limit direct marketing to a reasonable and proportionate level, and to send you communications which we believe may be of interest or relevance to you, based on the information we have about you.

**6. Legal basis for processing Personal Data.**

6.1 We will only collect, use or share your Personal Data as permitted by applicable law. In the normal course of business Huntsman will collect, use, or share Personal Data for the purposes set out in this Privacy Notice where we are satisfied that:

6.1.1 our use of your Personal Data is necessary to perform a contract, or take steps to enter into a contract, with you. For example, in order to provide our product and our services it will be necessary for us to process certain Personal Data to fulfil your order; or

6.1.2 our use of your Personal Data is necessary to support legitimate interests that we have as a business to provide products and services to our customers, provided it is conducted at all times in a way that is proportionate, and that respects your privacy rights. For example, we strive to always improve our products and services in order to make them fit our customers' needs. Also, we carry out processing for the purpose of knowing our customer and maintaining our relationship with you, with a view to providing a stellar customer experience. or

- 6.1.3 our use of your Personal Data is necessary to comply with a relevant legal or regulatory obligation that we have. For example, to maintain appropriate business records, to comply with lawful requests by public authorities and to comply with applicable laws and regulations or as otherwise required by law; or
- 6.1.4 you have provided your consent to us using your Personal Data for that purpose (e.g. where you provide us with marketing consents). Where the basis of processing is your consent, you have the right to withdraw your consent, and therefore prevent that processing, at any time.

## **7. How we protect and store your Personal Data.**

### **7.1 Data Security**

- 7.1.1 To prevent unauthorised access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the Personal Data we collect. Some of the steps we take are: placing confidentiality requirements on our staff and service providers; destroying or permanently anonymising Personal Data if it is no longer needed for the purposes for which it was collected. Huntsman will comply with applicable laws in the event of any breach of the security, confidentiality or integrity of your Personal Data and, where we consider appropriate or where required by applicable law, notify you via email, text or conspicuous posting on our Sites in the most expedient time possible and without unreasonable delay, in so far as it is consistent with (i) the legitimate needs of law enforcement, or (ii) any measures necessary to determine the scope of the breach and restore the reasonable integrity of the data system.
- 7.1.2 However, the security of Personal Data depends in part on the security of the device used to communicate with us, the security you use to protect your login information (where applicable), and the security provided by your internet access service provider. We make commercially reasonable efforts to make the collection and security of information consistent with this Privacy Notice and all applicable laws and regulations.

### **7.2 Data Retention**

- 7.2.1 Personal Data collected through our Sites is retained only as long as (i) it is needed for the purposes for which it was obtained in accordance with the provisions of this Privacy Notice or (ii) we have another lawful basis for retaining that data beyond the period for which it was necessary to serve the original purpose for collecting the data to the extent legally permitted and based on our legal obligations (e.g. in relation to invoice retention) or legitimate interests (e.g. in retaining data for the purposes of responding to possible disputes or complaints).

7.2.2 In addition, we maintain a data retention policy which we apply to Personal Data in our care. Where your data is no longer required, we take commercially reasonable measures to ensure it is securely deleted or anonymised.

## **8. We may share your Personal Data.**

Huntsman may share your Personal Data with third parties (or otherwise allow them access to it) only in the following manners and instances:

- 8.1 to other Huntsman entities for the purposes mentioned in this Privacy Notice; or
- 8.2 with any third parties to whom the relevant Huntsman entity subcontracts all or part of this processing. The purpose of this transfer will be to help manage our business and deliver services. For instance, we will transfer your Personal Data to a service provider to the extent necessary to complete an order and deliver your product. Other instances will include transfers to e-marketing service providers, hosting providers and any other relevant roles. Note that we will never sell your Personal Data to a third party. These third parties have agreed to confidentiality restrictions and have committed to use any Personal Data we share with them or which they collect on our behalf solely for the purpose of providing the contracted service to us; or
- 8.3 to other third party entities for the for purposes mentioned in this Privacy Notice, including governmental agencies and regulators (e.g. tax authorities), outside auditors (when conducting audits necessary to satisfy statutory requirements), external counsel, courts and other tribunals and government authorities (e.g. to preserve or defend the Company's legal rights); or
- 8.4 where permitted by applicable laws, Huntsman will disclose or otherwise allow others access to your Personal Data pursuant to a legal request, such as a subpoena, legal proceedings, search warrant or court order, or in compliance with applicable laws, if we have a good faith belief that the law requires us to do so, with or without further notice to you. If warranted, we will also allow access to this Personal Data in special emergencies where physical safety is at risk; or
- 8.5 we will disclose any Personal Data or other information obtained from or about you, to third parties in connection with a merger, acquisition, bankruptcy or sale of all or substantially all of our assets, to the extent that this is necessary for the process.

Other Huntsman entities and the third parties set out in this section are primarily based in the US and the European Economic Area ("EEA"); they may also be based in other locations where Huntsman operates.

## **9. Transferring Personal Data globally.**

- 9.1 Your Personal Data may be transferred and stored outside your place of residence, to locations that are subject to different standards of data protection. In particular, if you



live in the EEA, you should be aware that your Personal Data may be shared with, and transferred to, Huntsman entities and third-party service providers who are located outside the EEA. We will take appropriate steps to ensure that transfers of Personal Data are in accordance with applicable law and carefully managed to protect your privacy rights and interests and transfers are limited to countries which are recognised as providing an adequate level of legal protection or where we can be satisfied that alternative arrangements are in place to protect your privacy rights. To this end:

- 9.1.1 we will ensure that transfers within Huntsman will be covered by appropriate safeguards in accordance with applicable data privacy laws, including by executing an agreement between members of Huntsman group (an intra-group agreement) which contractually obliges each member to ensure that Personal Data receives an adequate and consistent level of protection wherever it is transferred within the Huntsman group (e.g. via Standard Contractual Clauses) and/or, as far as U.S. Huntsman entities are concerned, by adhering to the EU-U.S. Data Privacy Framework program; or
- 9.1.2 where we transfer your Personal Data outside Huntsman or to third parties who help provide our products and services, your Personal Data will be protected by Standard Contractual Clauses or other appropriate data transfer mechanisms (e.g., with regard to U.S.-based third parties, adherence to the EU-U.S. Data Privacy Framework program); or
- 9.1.3 where we receive requests for information from law enforcement or regulators, we will carefully validate these requests before Personal Data is disclosed.

You have a right to contact us for more information about the safeguards we have put in place (including a copy of relevant contractual commitments) to ensure the adequate protection of your Personal Data when this is transferred as mentioned above.

## **10. Use of cookies and other tracking technologies.**

Huntsman uses certain monitoring and tracking technologies (such as cookies, beacons, pixels, tags and scripts). These technologies are used in order to maintain, provide and improve our services on an ongoing basis, and in order to provide our customers with a better experience. For example, thanks to these technologies, we are able to maintain and keep track of our customers' preferences and authenticated sessions, to better secure our services, to identify technical issues, user trends and effectiveness of campaigns, and to monitor and improve the overall performance of our services. For our cookie policy, please refer to <https://www.huntsman.com/privacy/cookies>.

### **10.1 Cookies**

- 10.1.1 Our Sites use cookies, web beacons and similar technologies ("cookies") to track information provided to us by your browser when you use our Sites. Cookies are small text files containing small amounts of information which are

downloaded and may be stored on any of your devices that enable internet usage e.g. your computer, smartphone or tablet - like a memory for a web page. We use several different types of cookies.

## 10.2 We use the following cookies on our Sites:

### 10.2.1 necessary cookies

Necessary cookies are essential and help you navigate our Sites. This helps to support security and basic functionality and is necessary for the proper operation of our Sites, so if you block these cookies we can't guarantee your use or the security during your visit.

### 10.2.2 functionality cookies

Functionality cookies are used to provide you the best user experience. These cookies are, for instance, used to personalise content for you in line with your location. It also allows our Sites to remember choices made (like turning off use of cookies or which location you have previously selected) to provide more personal features.

### 10.2.3 performance cookies

Performance cookies help us to understand the behaviour of users of our Sites. This allows us to continuously improve our Sites to provide the best information in support of our project aims. These cookies are also used to help us understand how effective our Sites are. For instance these cookies tell us which pages visitors go to most often and if they get error messages from web pages.

10.2.4 All of the cookies are managed by third parties, and you may refer to the third parties' own website privacy notifications for further information. In particular, we use Google Analytics, which allows us to assess how you and other web users use our Sites, and this information is essential in helping us to continuously improve our Sites' functionality. They can be preserved from 30 minutes to two years. The information generated by these cookies about your use of our Sites (including your IP address) will be transmitted to and stored by Google Inc. on servers in the United States.

## 10.3 Control your cookie settings:

Once you have given us your consent to the use of certain cookies that are not strictly necessary via our cookie banner, we shall store a cookie on your computer or device to remember this for next time. You may withdraw your consent at any time via our cookie banner.



**11. Your rights in relation to your Personal Data.**

- 11.1 Subject to paragraph 11.2, certain exemptions, and in some cases dependent upon the processing activity we are undertaking, you have the following rights in this paragraph:
- 11.1.1 to object to processing which we have justified on the basis of a legitimate interest and to object (without the need to provide any justification) to direct marketing activities;
  - 11.1.2 to request that we provide you with a copy of your Personal Data that we hold and you have the right to be informed of: (a) the source of your Personal Data; (b) the purposes, legal basis and methods of processing; (c) the data controller's identity; and (d) the entities or categories of entity to whom your Personal Data may be transferred;
  - 11.1.3 to request that we restrict the processing of your Personal Data where: (a) the accuracy of the Personal Data is contested; (b) the processing is lawful but you object to the processing of the Personal Data; (c) we no longer require the Personal Data for the purposes for which it was collected, but it is required for the establishment, exercise or defense of a legal claim;
  - 11.1.4 to request that we erase your Personal Data in limited circumstances (e.g. where it is no longer necessary in relation to the purpose(s) for which it was collected or processed);
  - 11.1.5 to, in limited circumstances, request that we transfer your data to another company in a machine readable format (data portability);
  - 11.1.6 where processing is based on your consent, to withdraw your consent;
  - 11.1.7 to request that we change the manner in which we contact you for marketing purposes;
  - 11.1.8 to request that we correct any errors in your Personal Data or update your data, as required;
  - 11.1.9 to obtain a copy of the safeguards under which your Personal Data is transferred outside the EU; and
  - 11.1.10 For EEA Member State residents, you also have a right to lodge a complaint with your national data protection supervisory authority at any time. However, we encourage you to first contact us via the contact information set out in Section 14.
- 11.2 Please note that the rights in Section 11.1 are not absolute and there are exceptions under applicable law. Should Huntsman decline, in whole or in part, to fulfill any request made pursuant to Section 11.1, we will provide a reason for why such request was declined. We

may ask you for additional information to confirm your identity and for security purposes, before disclosing the Personal Data requested to you. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive. Huntsman will not discriminate against you for your exercise of rights under this Privacy Notice.

- 11.3 California law permits California residents to designate an agent to manage their rights under California law. If you qualify and you would like to designate an agent to manage your rights under Section 11.1, you may do so using the mechanisms noted below under “Contact Information”. We will also need sufficient personal information about your authorized agent to be able to identify them. As part of this process, you must have permission from your authorized agent to disclose their personal information to us for the purpose of acting as your agent. Your designated agent will then be able to contact us using the same mechanisms available to you. If you submit a Data Subject Access Request, to verify the request, we will match identifying information provided by you to the personal information we have on file, taking into account the type of request as well as the type, risk and value of the personal information involved.

## **12. Changes to this Privacy Notice**

We may update and change this Privacy Notice from time to time. The most recent version can always be found on this page. The date on which this text was last modified can be found in the head of the document.

## **13. Data Privacy Framework for Individuals in the EU, the EEA, the UK and Switzerland.**

Huntsman complies with the EU-U.S. Data Privacy Framework (“EU-U.S. DPF”), the UK Extension to the EU-U.S. DPF (“UK DPF Extension”) and the Swiss-U.S. Data Privacy Framework (“Swiss-U.S. DPF”) as set forth by the U.S. Department of Commerce. Huntsman has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (“EU-U.S. DPF Principles”) with regard to the processing of Personal Data received from the European Union and the United Kingdom in reliance on the EU-U.S. DPF and the UK DPF Extension. Huntsman has also certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (“Swiss-U.S. DPF Principles” and together with the “EU-U.S. DPF Principles”, the “Principles”) with regard to the processing of Personal Data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this Privacy Notice and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern.

In compliance with the EU-U.S. DPF, the UK DPF Extension and the Swiss-U.S. DPF, Huntsman commits to resolve DPF Principles-related complaints about our collection and use of your personal information. EU, UK and Swiss individuals with inquiries or complaints regarding our handling of Personal Data received in reliance on the EU-U.S. DPF, the UK DPF Extension and the Swiss-U.S. DPF should first contact Huntsman using the contact methods set forth in Section 14 of this Privacy Notice.

Huntsman has posted on our website our Data Privacy Framework Policy. This Data Privacy Framework Policy contains additional information about Huntsman's obligations and your rights under the EU-U.S. DPF, the UK DPF Extension and the Swiss-U.S. DPF including the choices and means Huntsman offers individuals for limiting the use and disclosure of Personal Data, the possibility of invoking binding arbitration in the event of a dispute and Huntsman's liability to you in the event of an onward transfer of your Personal Data to a third party. To learn more about the Data Privacy Framework program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

#### **14. Contact information**

14.1 Huntsman International LLC, 10003 Woodloch Forest Drive, The Woodlands, Texas, 77380, USA, is the data controller for the purposes specified in this notice. Huntsman's representative in the EEA is Huntsman International (Germany) GmbH.

14.2 If you have any questions about this Privacy Notice or wish to exercise any of your rights as described in paragraph 11, you can contact us at:

- By e-mail: [privacy@huntsman.com](mailto:privacy@huntsman.com)
- By letter to the privacy team: Huntsman International LLC; Attention: Privacy Officer, 10003 Woodloch Forest Drive, The Woodlands, Texas 77380 USA
- By phone: (281) 719-6000
- By submitting a Data Subject Access Request at <https://www.huntsman.com/privacy/data-request>

You can contact Huntsman's representative in the EEA via:

- By email: [privacy@huntsman.com](mailto:privacy@huntsman.com)
- By letter: Huntsman International (Germany) GmbH, Attention: Human Resources, Land Au 30, 94469 Deggendorf

We will attempt to resolve any complaints regarding the use of your Personal Data in accordance with this Privacy Notice and applicable laws.