

Personal Information Protection Notice

Nagase America LLC (“NAGASE”) appreciates your visit to our website (this “Website”) and your interest in our services and products. As Your privacy is important to us, and we take care to protect your information, including your Personal Information (defined as information that directly or indirectly personally identifies you and any type of information about you protected under applicable data privacy laws) collected through this Website and/or through the normal conduct of our business operations.

By accessing this Website, you accept, and consent to, this Personal Information Protection Policy (this “Privacy Notice”). If you do not agree to this Privacy Notice, your choice is not to use this Website. This Privacy Notice may be updated from time to time without notice. We therefore ask you to consult it on a regular basis. The last line of this Privacy Notice below indicates when this Privacy Notice was last updated.

The Purpose and The Scope of This Privacy Notice

This Privacy Notice applies to the information you have provided about yourself or that NAGASE has generated in connection with your use of our website or use of our online services.

The terms of this Privacy Notice may be modified or supplemented by other agreements you have entered with NAGASE, or any applicable laws or regulations related to the protection of personal information. For certain services, NAGASE may provide you with privacy statements in addition to this Privacy Notice.

Information We Collect About You

We may collect and process Personal Information about you from different sources, including but not limited to:

- **Identity Data** includes name, country, company, position, employer number, user account data, date of birth and gender.
- **Contact Data** includes email address, telephone numbers, office location address, billing address, delivery address.
- **Financial Data** includes bank account and payment card information.
- **Technical Data** includes internet protocol (IP) address, date and time of your access, time zone setting and location, browser type and version, your device identifies, your internet or wireless service provider and other technology on the devices you use to access this Website.

The above categories and their definitions are only exemplary and additional information or types of information may be collected, however, we specifically strive to not collect any highly sensitive information, such as social security numbers, protected class information, medical information and the like.

How We Collect and Process Personal Information

We use different methods to collect Personal Information from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by exchanging business cards, sending emails or filling in forms or otherwise.
- **Automated technologies or interactions.** As you interact with our Website, we (and service providers acting on our behalf) will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this Technical Data by using Cookies and other similar technologies. Please see our Cookie Policy on the next page for further details.

Purposes for Which We Will Use Your Personal Data

The following are examples of how we may use Personal Information we collect:

- providing our products and services and information relating to our products and services;
- execution and performance of contracts for our products and services, as well as management after completion of such contracts;
- fulfill customer inquiries, respond to any problems that may arise, such as difficulties in navigating this Website or accessing certain features;
- send samples, price quotations, products and information;
- develop new products and services;
- send you newsletters, features, promotional material, surveys and other updates;
- send you emails and/or postal messages with information about the brand and other content of NAGASE Group Companies that we think may be of interest to you;
- develop and provide advertising tailored to your interests, including interest-based advertising;
- personalize your experience on this Website by presenting products and information tailored to you;
- gauge our customers' trends to determine what products and services are most popular with our customers; and
- for services relating to or connected to services other than those described above.

Disclosures of Your Information

We may share your Personal Information with NAGASE Group Companies inside or outside the United States. NAGASE may also outsource the processing of your Personal Information to third parties.

NAGASE may also disclose Personal Information to governmental agencies or entities, regulatory authorities, courts, or other persons in accordance with any applicable law, regulation, court order or official request, or under any and for the purposes of guidelines issued by regulatory or other authorities, or similar processes as either required or permitted by applicable law. When transferring Personal Information internationally we, and our service providers acting on our behalf, follow applicable data privacy laws.

How Long Do We Store Your Personal Information?

We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Notice, unless a longer retention period is required by law. We erase your personal data if the retention of that personal data is no longer necessary for the purposes for which they were collected or otherwise processed, or to comply with legal obligations (such as retention obligations under tax or commercial laws).

Cookie Policy

This website uses cookies web beacons or other similar tools. Cookies are small files containing certain information that are stored on your device. Cookies are served either by Nagase or by third parties providing services to Nagase. As you interact with our Website, we (and service providers acting on our behalf) will automatically collect technical data about your equipment, browsing actions and patterns. Cookies are necessary to provide certain functionalities on a website, e.g. to maintain a language choice made by a user. Moreover, cookies enable the respective issuer (Nagase or a third party) to recognize that the website was previously called up by a certain end device, allowing the identification of returning visitors (or rather their end devices) and gathering information about their usage of the website and their presumed interests.

Cookies can be assigned to four categories, depending on their function and intended purpose: strictly necessary cookies, performance cookies, functionality cookies, and targeted cookies. To review a description of these categories and how the information collected with cookies is used, or to change or withdraw your consent at any time, please refer to the Cookie Settings page by visiting: nagaseamerica.com/privacy-policy/#cookie-policy.

Information from Third-Party Analytics Providers

We may use one or more third-party analytics services to evaluate your use of this Website or other NAGASE websites or platforms, as the case may be, by compiling reports on activity (based on their collection of IP addresses, Internet service provider, browser type, operating system and language, referring and exit pages and URLs and other similar usage data) and analyzing performance metrics. These third parties use cookies and other technologies to help collect, analyze, and provide us reports or other data.

By accessing and using our Website or other NAGASE websites or platforms, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Notice.

Security of Your Personal Information

We follow generally accepted industry standards to protect the information submitted to us, both during transmission at this Website and once we receive it. We maintain appropriate administrative, technical and physical safeguards to protect the Personal Information collected by us against accidental or unlawful destruction, accidental loss, unauthorized alteration, unauthorized disclosure or access, misuse, and any other unlawful form of Processing of the Personal Information in our possession.

However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. NAGASE cannot ensure or warrant the security of any information you transmit to us. NAGASE also cannot guarantee that such information may not be accessed, disclosed, altered,

or destroyed by breach of any of our physical, technical, or managerial safeguards. If you believe your Personal Information has been compromised, please contact us as set forth in the “How to Contact Us” section of this Policy.

We have put in place procedures to deal with any suspected Personal Information breach and will notify of a breach where we are legally required to do so.

Further Information for UK and EU Residents

See [Appendix 1. Additional Notices for UK and EU Residents Only](#).

Further Information for US Residents

See [Appendix 2. Further Information for US Residents](#).

Your Rights

The data privacy laws in your jurisdiction may entitle you to the following rights:

- Confirm whether we process their personal information.
- Access and delete certain personal information.
- Data portability.
- Opt-out of personal data processing for targeted advertising and sales.
- Correct inaccuracies in their personal information, taking into account the information's nature processing purpose.
- Opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects.

Changes to this Privacy Notice

From time to time, in order to comply with changes in applicable law or for legitimate business purposes, we may make changes to this Privacy Notice. Any changes we make will be displayed on this Website. Please check back from time to time to ensure that you have read the most recent version of this Privacy Notice.

How to Contact Us

If you have any questions or concerns about this Privacy Notice or our privacy practices, please contact us using the [Personal Data Change Request Form](#).

Alternatively, you can contact us in writing at:

Nagase America LLC

Attn: Data Privacy Officer

546 Fifth Avenue, 19F, New York, NY 10036

legal@nagase-nam.com

Appendix

Appendix 1. Additional Notices for UK and EU Residents Only

Data protection regulations in the UK and Europe require NAGASE to disclose additional information regarding Personal Data collected from UK and European users, and to limit NAGASE's use of such information in specific ways. This section provides additional information applicable to UK and European Personal Data, which may not apply to users in other geographies.

Legal Basis for Processing

UK and European Personal Data may only be processed by NAGASE where and to the extent that such processing is:

- Necessary for the performance of a contract with you, such as:
 - To carry out NAGASE's obligations with respect to any contractual agreements between us with respect to information, products, and services that you may request from NAGASE;
 - To process a job application; or
 - To fulfill any other agreements between us.
- Necessary for NAGASE to comply with a legal obligation, for example to meet our tax and accounting obligations.
- Necessary to serve the legitimate business interests of NAGASE or a third party, where such use is consistent with the fundamental rights of individuals under UK and European law, for example:
 - To provide you with effective customer service or technical support, such as where you have requested information from NAGASE;
 - To contact you with information regarding health and safety, applicable regulations, or stewardship of our products;
 - To improve the content, functionality, performance, security and usability of our website;
 - To notify you about changes to our business, products, services, or our website;
 - To conduct business transactions, including purchases and sales of NAGASE products, or business reorganizations including the sale, transfer, change in control or merger of NAGASE assets or businesses.
- Subject to a valid consent you have freely provided and not withdrawn, such as opt-in consents allowing NAGASE to place cookies on your computer or to use your contact information for promotional advertising.

Data Subject Rights

UK and European users of this website have the legal right to request NAGASE undertake specific actions with respect to their Personal Data, including:

- The right to request access to your Personal Data, including the right to have NAGASE confirm if your Personal Data is being used by NAGASE;
- The right to have your Personal Data corrected or erased;
- The right to object to or restrict NAGASE's use of your Personal Data, for example where such information is not accurate or no longer needed;

- The right to have your Personal Data transferred from NAGASE to another party;
- The right to not be subject to automated decision-making or profiling based on your Personal Data;
- The right to withdraw any consent you have previously provided to NAGASE's collection or use of your Personal Data; and
- The right to lodge a complaint with a supervisory authority.

Cross-Border Transfers of Data

The information that NAGASE collects from you will be transferred to, and stored at, a destination outside the UK or European Economic Area ("EEA"). It may be processed by staff operating outside the EEA who work for us, or by other entities acting as data processors on our behalf.

Data Retention

NAGASE will process and store your Personal Data for the duration of our relationship with you, which may be a long term, and as long as necessary to fulfill our contractual and legal obligations. NAGASE will delete your data:

- When it is no longer necessary for the purposes for which that information was collected and processed;
- Upon your request or objection, provided there are no overriding legal grounds requiring NAGASE to maintain that information;
- When necessary to comply with NAGASE's legal obligations; and
- If our collection of information was based on your consent, upon the withdrawal of your consent.

Any requests or inquiries relating to NAGASE's handling of EU information may be made by contacting us using the [Personal Data Change Request Form](#).

Appendix 2.a. Further Information for US Residents

Do Not Track

At this time our Website does not recognize or respond to “Do Not Track” browser signals. For more information on “Do Not Track”, please visit your browser’s support page.

Usage by Children

This Website is not directed to children under the age of thirteen. We will not knowingly collect personal data from children under the age of thirteen without insisting that they seek prior parental consent if required by applicable law. We will only use or disclose personal data about a child to the extent permitted by law, to seek parental consent, pursuant to local law and regulations or to protect a child.

State Rights

Depending on the US state in which you reside, you may have special rights with respect to your personal data. For information regarding any of those rights, please see the **Appendix 2.b. Specific Rights for State Residents**, below.

Appendix 2.b. Specific Rights for State Residents

This appendix supplements NAGASE’s Privacy Notice, and sets forth information and describes rights that may be applicable to residents of the following US states:

- California
- Virginia

The purpose of this notice is to provide information to residents of these US states, and to notify them of their rights under the law of their state of residence. This section is not applicable to and may not be relied upon by anyone who resides outside of the listed US states. If you reside in one of the listed US states, (a) you may have additional rights with respect to your personal data, and (b) you should note the following.

Notices

NAGASE may, through a variety of online and offline sources, collect the categories of personal information identified below and in NAGASE’s Privacy Notice:

- Personal identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, social security number, driver’s license number, passport number, telephone number, passport number, state identification card number, insurance policy number, bank account number, credit card number, debit card number, financial information, medical information, or health insurance information.
- Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement
- Geolocation data.

- Biometric and physical characteristics such as audio, electronic, visual, thermal, olfactory, or similar information.
- Professional or employment-related information.
- Education information

Such collected information may be used for the purposes described elsewhere within NAGASE's Privacy Notice which directed you to this page.

Sale and Disclosure

We disclose personal information for business purposes. The categories of personal information that we have disclosed for business purposes within the preceding 12 months include:

- Personal identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, social security number, driver's license number, passport number, telephone number, passport number, state identification card number, insurance policy number, bank account number, credit card number, debit card number, financial information, medical information, or health insurance information.
- Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.
- Geolocation data.
- Biometric and physical characteristics such as audio, electronic, visual, thermal, olfactory, or similar information.
- Professional or employment-related information.
- Education information

The categories of third parties with which we may share personal data are described in NAGASE's Privacy Notice which directed you to this page. Please note that we do not engage in the sale of personal data to third parties at this time.

Exercise of Applicable Rights; Appeal

In order to exercise any rights that may be available to you under the law of the state in which you reside (for example, any rights to deletion or disclosure of personal data or to appeal a decision that we have made with respect to your request), please contact us via this online form.

Please note that any requests may be subject to verification of the identification of the requestor. The method we would use to verify your identity will be different depending on the manner and context in which your data was collected and may require the provision by you of such personal information as may be necessary to match you to our records of you (if any). Depending on the laws of your state, you may be entitled to use an authorized agent to exercise your rights on your behalf and, if you choose to do so, such an agent may contact us in the same manner as described above, and will also be required to verify their own identity and their authority to act on your behalf.

To exercise the rights that may be available to you as described above, please contact us using the Personal Data Change Request Form.

You have the right not to be discriminated against by us for exercising any of these rights.

Additional Notices for California Residents Only

This section applies and provides further information to California residents and notifies them of their rights under California law. This section is not applicable to and may not be relied upon by anyone else besides California residents.

California's "Shine The Light" law

California's "Shine The Light" law permits those of our customers who are California residents to annually request a list of their personal data (if any) that we have disclosed to third parties for direct marketing purposes in the preceding calendar year, and the names and addresses of those third parties. At this time, we currently do not share any personal data with third parties for their direct marketing purposes.

Notices

The sources from which the personal information may be collected may include:

- the internet sites of NAGASE and its affiliates that you visit,
- the mobile applications of NAGASE and its affiliates that you use;
- you or your employer, such as via telephone, mail, email, or at trade shows, or in connection with potential employment or business opportunities;
- our customers, vendors, and suppliers; and
- third parties from whom we purchase contact data, such as Linked-In

Rights

(a) California residents have the right to request that we delete the personal data that we have collected about that resident. Please note that there are circumstances under which such a right of deletion does not apply, such as where it is reasonable for us to maintain the personal information to:

- Complete the transaction for which the personal information was collected, provide a good or service requested or reasonably anticipated, or otherwise perform a contract with the resident.
- Detect security incidents; protect against malicious, deceptive, fraudulent or illegal activity; or prosecute those responsible for that activity.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another resident to exercise his or her right of free speech, or exercise another right provided for by law, or Comply with a legal obligation.
- Comply with the California Electronic Communications Privacy Act.
- Engage in public or peer-reviewed scientific, historical or statistical research in the public interest (when deletion of the information is likely to render impossible or seriously impair the achievement of such research) if the resident has provided informed consent.
- To enable solely internal uses that are reasonably aligned with the resident's expectations based on the relationship with us.
- To otherwise use the personal information, internally, in a lawful manner that is compatible with the context in which the resident provided the information.

(b) California residents have the right to request that we disclose, with respect to that resident:

- The categories of personal information we have collected.
- The categories of sources from which we collected the personal information.
- The purpose for collecting or selling personal information.
- The categories of third parties with whom we share personal information.
- The specific pieces of personal information we have collected.

(c) California residents have the right to request correction of inaccurate personal information.

To exercise the rights that may be available to you as described above, please contact us using the Personal Data Change Request Form.

You have the right not to be discriminated against by us for exercising any of these rights.