

(ELEMENTIS WEBSITE PRIVACY AND COOKIE POLICY)

Privacy policy

Elementis plc (“**Elementis**”) is committed to protecting and respecting your privacy.

This policy (together with our terms of use <http://www.elementisplc.com/terms-of-use/> and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Who we are

For the purpose of the General Data Protection Regulation 2016/679 (“**GDPR**”) and laws implementing or supplementing the GDPR (“**Data Protection Laws**”) the data controller is Elementis plc (company number 03299608), registered office at Caroline House, 55 - 57 High Holborn, London, United Kingdom, WC1V 6DX.

This Privacy Policy applies to this website only. To the extent that this website permits you to link to or otherwise access the websites of third-parties, separate privacy policies may apply to those linked websites. Those separate privacy policies may contain terms different than those contained in this Privacy Policy, and your access to and use of such linked websites are not governed by this Privacy Policy. Elementis expressly disclaims any and all responsibility for your access to and use of such linked websites, as well as for any use of the personal data that you may provide, or any personal information that may be collected about you (including via cookies) at such linked websites.

Information we may collect from you

We may collect and process the following data about you:

- information that you provide (such as your name, address, email, telephone and/or other contact details) by filling in forms on our website <http://www.elementis.com> or any of our partner websites (our “**site**”). This includes information provided at the time of subscribing to our email alerts, completing online forms and/or as you purchase products or services from us;
- date and time of access to our site, pages visited, browser information and IP address (including location data);
- if you contact us by correspondence or phone, we may keep a record of that correspondence and the data you provide to us for the purposes of quality assurance, training, fraud prevention and compliance; and
- details of your visits to our site, including your IP address and the resources that you access.

Sensitive Personal Information

We may ask you to provide sensitive personal information, such as any accessibility requirements in the event that we may be required to make reasonable adjustment(s) for the purposes of visits to any of our premises. If we request such information, we will explain why we are requesting it, how we intend to use it and only obtain it with your explicit consent.

Lawful grounds for processing

Our lawful processing grounds are consent, contractual and legal necessity and our legitimate interests or those of a third party. In litigation or for other legal purposes involving us or a third party, we may also need to transfer your personal information to countries with a lower standard of data protection laws than is applicable in your country of residence.

IP addresses and cookies

We may collect information about your computer, including where available your IP address, operating system and browser type, to monitor use of the site, analyse trends, track users’ movement

and gather a broad demographic information for aggregate use. This may include statistical data about our users' browsing actions and patterns.

For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. They enable us to:

- estimate our audience size and usage pattern;
- store information about your preferences, and so allow us to customise our site according to your individual interests;
- speed up your searches;
- store information and 'remember' which properties you have in your "wish list";
- recognise you when you return to our site;
- evaluation of system and network stability/security; and
- for administrative purposes.
- Provide security (dual factor authentication)

How we use cookies

The ways in which we use cookies on our website are detailed below. Cookies are used to collect information about how visitors use our website and we use the information to compile reports and to help us to improve the website.

'Session' cookies remain in your browser during your browser session only, i.e. until you leave the website.

'Persistent' cookies remain in your browser after you leave the website (unless deleted by you).

Google Analytics	_utma	This cookie is typically written to the browser upon the first visit. If the cookie has been deleted by the browser operator, and the browser subsequently visits to our website, a new __utma cookie is written with a different unique ID. In most cases, this cookie is used to determine unique visitors to our website and it is updated with each page view. Additionally, this cookie is provided with a unique ID that Google Analytics uses to ensure both the validity and accessibility of the cookie as an extra security measure.	First Party Persistent	2 years from set/update
Google Analytics	_utmb	This cookie is used to establish and continue a user session with www.elementisplc.com . When a user views on our website the Google Analytics code attempts to update this cookie. If it does not find the cookie, a new one is written and a new session is established. Each time a user visits a different page on our website; this cookie is updated to expire in 30 minutes, thus continuing a single session for as long as user activity continues within 30-minute intervals. This cookie expires when a user pauses on a page on our website for longer than 30 minutes.	First Party Persistent	30 minutes from set/update
Google Analytics	_utmc	This cookie operates in conjunction with the '_utmb' cookie to determine whether or not to establish a new session for the user. If it does not find the cookie, a new one is written and a new session is established. This cookie expires when a user's session is no longer active.	First Party Session	At end of session
Google Analytics	_utmz	This cookie stores the type of referral used by the visitor to reach our website, whether via a direct method, a referring link, a website search, or a campaign such as an ad or an email link. It is used to calculate search engine traffic, ad	First Party Persistent	6 months from set/update

		campaigns and page navigation within our website. The cookie is updated with each page view to our website.		
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How you can change your cookie settings

You may refuse to accept cookies by activating the setting on your browser which allows you to disable cookies. However, if you select this setting you may be unable to access certain parts of our site, such as the Wish List. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

Cookies expire two hours after you have finished using our site. The lifespan of the stored information is long enough to assist your movement around the site in one sitting but will not enable longer term storage of information.

To find out more about cookies, including how to manage cookies for your browser visit www.aboutcookies.org or www.allaboutcookies.org, or your browser developer's website for more information.

To opt out of being tracked by Google Analytics across all websites, visit <http://tools.google.com/dlpage/gaoptout>.

Where we store your personal data and International Transfers

The data that we collect from you may be transferred to, and stored at, a destination outside the UK/European Economic Area ("EEA"), including to the US and other countries which may have a lower standard of data protection laws compared to the laws in your country of residence. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. By submitting your personal data to us, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. Elementis uses standard contractual clauses in the form approved by the European Commission to transfer your personal data between its European and non-European affiliates (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32004D0915>) and between its European affiliates and non-European data processors (<https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32010D0087>) unless another lawful safeguard is applicable. The European Commission approved standard contractual clauses are available [here](#)

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Uses made of the information

We use information held about you in the following ways:

- identify you and manage any accounts you hold with us;
- process orders, including any samples you may request;
- to ensure that content from our site is presented in the most effective manner for you and for your computer;
- to provide you with information, products or services that you request from us including your subscriptions to our newsletters and updates or which we feel may interest you, where you have consented to be contacted for such purposes;
- to allow you to participate in interactive features of our service, when you choose to do so; and
- to notify you about changes to our service; and
- improve our services.

We can confirm that we do not use your Personal Information for profiling or automated decision making purposes.

Marketing

With your consent, we may also use your data or, also with your consent, permit selected third parties to use your data, to provide you with information about goods and services which may be of interest to you and we or they may contact you about these by post, email or telephone. If you no longer want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick unsubscribe or opt out by ticking the relevant box or clicking the link in the email communication or contact us to update your settings.

You can withdraw your consent from direct marketing at any time by visiting the “[Email Alerts](#)” function of our website [here](#) and unsubscribe or amend your communication preferences by logging into your account. Alternatively, please contact our Data Protection Officer under “Contact Us” below.

Disclosure of your information

We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We may disclose your personal information to third parties:

- who provide services to us;
- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; and/or
- if Elementis plc or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.

If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use <http://www.elementisplc.com/terms-of-use/> and other agreements; or to protect the rights, property, or safety of Elementis, our users, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection.

Your rights

If changes need to be made to personal data, you should notify us as soon as possible in writing. Under applicable Data Protection Laws, you have rights to:

- (i) check whether we hold personal data about you and to access such data (subject to applicable laws);
- (ii) request correction of personal data about you that is inaccurate;
- (iii) ascertain information related to the Elementis’ policies and practices in relation to personal data;
- (iv) request the erasure of your personal data; and
- (v) request the restriction of processing concerning you.

In certain circumstances, you also may have the right to request restrictions or object for legitimate reasons to the processing of your personal data (including direct marketing and profiling) in accordance with the Data Privacy Laws. Further, you have the right to transfer your Personal Data to third parties pursuant to Article 20 of the GDPR.

You have the right to withdraw from direct marketing at any time, please see “Marketing” section above.

You have the right to raise concerns to Elementis or to a supervisory authority about our processing of your personal data. If you wish to exercise any of the rights listed above or to raise a concern with us, please contact our Data Protection Officer at: dataprivacy@elementis.com or by writing to us at the address below, see “Contact Us”.

The applicable supervisory authority of Elementis is the Information Commissioner’s Office in the UK (www.ico.org.uk).

Data retention

We store and retain your personal information for as long as you use the website or as long as necessary for the purposes listed above. We will store and retain your personal information for the purpose for which it was collected, as explained in this privacy notice, and in accordance with the statute of limitations period for contractual claims.

We may retain various types of information for longer periods pursuant to legal requirements under the applicable Data Protection Laws. We will make efforts to ensure that personal data is kept for no longer

than necessary for the purposes for which the personal data is processed and/or as outlined in our Records Retention Schedule, see "Contact Us" below if you wish to obtain a copy.

Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

Contact Us

Questions, comments and requests regarding this Privacy Policy or your Personal Information are welcomed and should be addressed to the Data Protection Officer, who can be contacted via the following means:

Email: dataprivacy@elementis.com

Address: Data Protection Steering Committee (DPO)
Elementis Plc
55-57 Caroline House
High Holborn
London
WC1V 6DX
United Kingdom

Web: <https://elementis.com/esweb/esweb.nsf/pages/DataProtection?opendocument>

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