

PERSONAL DATA PROTECTION POLICY - SUN CHEMICAL

Introduction and Summary

1.1. SUN CHEMICAL CARIBBEAN LIMITED a company that is part of the DIC Group, since this date demonstrates its commitment to the protection of personal data and privacy, establishing a global personal data protection program to support compliance with applicable laws and regulations regarding privacy and personal data protection to protect Personal Data. This Personal Data Protection Policy, including its annexes and sub-policies (collectively, the "Policy"), provides a general framework and sets out general requirements to ensure that we process personal data in a compliant, fair, legal, transparent, and secure manner, locally and globally. In addition, local policies and procedures may be applicable to specific topics.

1.2. This Policy is aligned with (and in some cases exceeds) the current legislation on Personal Data Protection and the determinations of the regulatory/supervisory bodies in this area, in particular, Data Protection Act (DPA) Chap 22:04 of the laws of the Republic of Trinidad and Tobago and its Regulations.

Definitions

"Owner of the Personal Data Base": means the natural or legal person, public authority, agency or any other body that determines the purposes and means of the Processing of Personal Data;

"Personal Data Subject": means an identified or identifiable natural person to whom the Personal Data relates. Examples of Data Subjects may include our (i) employees and their family members; (ii) temporary workers; (iii) candidates seeking employment with SUN CHEMICAL; (iv) the team of our suppliers and customers; (v) visitors to our facilities; (vi) users of the Website; (vii) potential customers; and (viii) potential service providers.

"Personal Data": means any information relating to an identified or identifiable natural person (a "Personal Data Subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

"Sensitive Personal Data": personal data regarding racial or ethnic origin, religious beliefs, political opinions, membership in a union or religious, philosophical, or political organization, data relating to health or sexual life, genetic or biometric data, when linked to a natural person.

"Anonymized data": data related to the subject that cannot be identified, considering the use of reasonable technical means available at the time of processing.

"Personal Data Breach": means any breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored, or otherwise processed.

"Processing": means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, restriction, erasure or destruction.

"Processor": means the natural or legal person, public authority, agency, or any other body which processes personal data on behalf of the Owner of the Personal Data Base.

"Sun Chemical": means SUN CHEMICAL GROUP COÖPERATIEF U.A. and each of its affiliated companies. "Sun Chemical Company" means an individual company affiliated with SUN CHEMICAL.

"Sun Chemical Region": means a designated region of SUN CHEMICAL.

Sun Chemical Group Coöperatief U.A., Sun Chemical Corporation and SUN CHEMICAL CARIBBEAN LIMITED will be the owners of the Personal Data Processing in the context of SUN CHEMICAL's activities in Trinidad and Tobago.

Centralized and Local Processing

2.1. All SUN CHEMICAL entities will process some Personal Data for their purposes locally, strictly in accordance with the purpose, appropriateness, necessity, and express consent of the data subjects. However, as a global organization, many of our business activities can also be conducted (and business efficiencies achieved) by processing and/or consolidating information about Personal Data Subjects in dedicated or centralized systems or databases located in various facilities around the world, if they provide the degree of personal data protection required by the DPA. Such Personal Data is also shared with other systems and databases hosted by SUN CHEMICAL and/or on its behalf. However, SUN CHEMICAL and those other systems and databases will only collect, receive, use, share or otherwise process such Personal Data in accordance with applicable law, this Policy, additional policies (to the extent applicable) and any specific local policies applicable to a SUN CHEMICAL company (as required by applicable local law).

Data Privacy Contact Groups and Controllers

3.1. SUN CHEMICAL companies will be the Controllers or Processors, as applicable, for the Processing of Personal Data. For specific global and regional processing activities, SUN CHEMICAL, Regional and Global SUN CHEMICAL companies will be the Controllers for the Processing of Personal Data.

3.2. If a Personal Data Subject has questions, complaints or would like to exercise his or her rights of access, rectification, cancellation and opposition, the Personal Data Subject may contact the Data Privacy Contact Group for his or her region, which can be reached by email at Trinidad-Tobago-Protection@sunchemical.com. Sun Chemical will make good faith efforts to answer each question, investigate each complaint and respond within the time periods established by law.

SUN CHEMICAL will treat each complaint in a fair, impartial, and objective manner. No Personal Data Subject will be victimized, discriminated against, or harmed directly or indirectly because of filing a complaint.

Privacy Principles

4.1. SUN CHEMICAL and anyone acting on its behalf must always conduct activities in accordance with the following Personal Data Protection Principles and consider privacy risks before collecting, using, retaining, disclosing or processing Personal Data, for example, in a new system or as part of a project.

- a. Legality, fairness and transparency: SUN CHEMICAL will only process Personal Data based on a legitimate reason, will act fairly and will provide Personal Data Subjects with information regarding the processing of their Personal Data.
- b. Purpose Limitation: SUN CHEMICAL will only collect Personal Data that is relevant and necessary for a specific, explicit, and legitimate purpose, and will only process Personal Data in a manner that is compatible with the purpose(s) for which it was collected.
- c. Proportionality/Data Minimization: SUN CHEMICAL will only process Personal Data that is adequate, relevant and necessary, and not excessive for the purpose for which it is processed.
- d. Quality: SUN CHEMICAL will keep Personal Data as accurate, complete and up to date as necessary for the purposes for which it is processed.

- e. Accountability: SUN CHEMICAL will implement appropriate measures to enable SUN CHEMICAL to demonstrate that the Processing of Personal Data is carried out in accordance with these Personal Data Protection Principles.
- f. Security: SUN CHEMICAL will process Personal Data in a manner that ensures appropriate security of the Personal Data, including protection against unauthorized or unlawful Processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

Notice, Consent and Rights of the Data Subject

5.1. When collecting Personal Data from the Data Subject or third parties, SUN CHEMICAL will send a privacy notice to the Data Subject, to comply with the duty to inform the Data Subject of the conditions of the processing of their data.

5.2. SUN CHEMICAL will provide Personal Data Subjects with appropriate access to Personal Data concerning them and will facilitate the exercise by Personal Data Subjects of their rights to correct, delete, restrict, or transfer Personal Data.

Confidentiality, Data Security and Breach Notification

6.1. SUN CHEMICAL will implement appropriate legal, technical, and organizational measures to ensure the relevant security of Personal Data, including protection against unauthorized or unlawful Processing and against accidental loss, destruction or damage.

6.2. In the event of a Personal Data breach, SUN CHEMICAL will notify the relevant supervisory authority without undue delay and, where possible, no later than seventy-two (72) hours after becoming aware of it. In addition, SUN CHEMICAL may also notify any Personal Data breach to Data Subjects whose Personal Data may have been compromised if the Personal Data breach results in an elevated risk to their privacy.

Data Retention

7.1. SUN CHEMICAL will retain Personal Data in a form which permits identification of Personal Data Subjects only for as long as is necessary in relation to the purposes for which it is processed or as required by applicable law, whichever is longer. SUN CHEMICAL will discard (or retain only in anonymous or non-identifiable form, to the extent possible) Personal Data that is no longer needed, securely and in accordance with applicable law, unless (i) it is for the defense of legal claims; (ii) there are mandatory retention or archiving requirements (legal or contractual) that require longer retention; or (iii) the Personal Data is processed solely for archiving purposes in the public interest, for scientific or historical research purposes, or for statistical purposes subject to the implementation of appropriate technical and organizational measures.

Transfer of Personal Data to Third Parties

8.1. SUN CHEMICAL will only make Personal Data available to third parties in appropriate circumstances, will inform Personal Data Subjects about this and will take measures to protect the Personal Data.

8.2. SUN CHEMICAL will carry out international transfers of Personal Data (whether between companies of the same group or others) outside of Trinidad and Tobago only when (a) the transfer is in accordance with the laws of the jurisdiction of the transferor; and (b) the transferor has ensured that there is an adequate level of protection in the jurisdiction of the recipient or that appropriate safeguards have been put in place to protect the Personal Data in accordance with the DPA. The transferor is responsible for assessing such adequacy and, if necessary, will require the recipient to adopt protections like those provided for in the policy and jurisdiction of the transferor. For data transfers outside of Trinidad and Tobago, SUN CHEMICAL guarantees that it has a global policy on data protection, and that all companies in the SUN CHEMICAL group comply with this policy.

Changes

9.1. Subject to applicable law, SUN CHEMICAL may revise, modify, or supplement this Policy at its discretion at any time or from time to time. Personal Data Subjects are advised to consult this Policy periodically to ensure that they are aware of any modifications. To the extent permitted by applicable law, any Personal Data Subject who allows SUN CHEMICAL to be a Controller and/or Processor of their Personal Data agrees to be bound by the latest version of this Policy.