



**Privacy statement for business partners pursuant to the EU General Data Protection Regulation (EU 2016/679) ("EU-GDPR") and United Kingdom General Data Protection Regulation ("UK-GDPR") under Data Protection Act 2018**

This privacy statement is addressed to individuals with whom we have a business relationship, including our customers and their representatives and our suppliers and their representatives (collectively, "business partners").

We are an affiliate of Westlake Corporation and appreciate your interest in our products and services. Your privacy is important to us and we want you to understand our practices with respect to the gathering and handling of your personal data. This Privacy Policy describes those practices.

**1. Purposes of the processing and legal basis for the processing**

We process personal data of our (potential) business partners and their representatives for the following purposes:

- Identify potential business partners (leads) and initiate business relationships, including making initial contact with the aim of establishing a business relationship
- Identification of our business partners
- Execution of compliance screenings for the fulfilment of legal obligations (e.g. sanctions list check)
- Implementation of pre-contractual measures including pre-contractual communication and preparation of offers and cost estimates
- Assessing the creditworthiness of our customers and setting and monitoring our customers' credit limits
- Fulfilment of contracts with our business partners including contractual communication, exchange of services, invoicing and payment processing
- Proper accounting and storage for the fulfilment of contractual and legal, in particular commercial and tax law, storage obligations
- Transfer of information to our parent company to ensure its compliance with legal obligations
- Storage for evidence purposes for the possible assertion, exercise or defence of legal claims
- Assertion, exercise or defence of legal claims, including cooperation with external lawyers or support by other companies of our group of companies
- Cooperation with external tax advisors and/or auditors for the fulfilment of legal obligations
- Cooperation with supervisory authorities, courts and other public bodies to fulfil legal obligations
- Business relationship management including contacting our business partners for information and maintaining the relationship with our business partners and matching our services to the needs and wishes of our business partners
- Data protection compliant deletion, destruction or anonymization of personal data

Depending on the purpose of processing, the following legal bases apply to data processing:

- Art. 6 (1) (b) GDPR/UK-GDPR (performance of contracts with data subjects / implementation of pre-contractual measures)
- Art. 6 (1) (c) GDPR/UK-GDPR (fulfilment of legal obligations)



- Art. 6 (1) (f) GDPR/UK-GDPR (protection of legitimate interests of us or of third parties under balancing of interests)
- Art. 6 (1) (a) GDPR/UK-GDPR (consent)

## 2. Processed categories of personal data

We process the following categories of personal data, but of course only to the extent necessary for the above purposes:

- Lead data (e.g.: Company, industry, name, function and business contact data of potential business partners)
- Master data (e.g.: Company, industry, registration number, VAT identification number and business identification number of business partners)
- Identification data (e.g.: details of the beneficial owner of our business partners)
- Contact details (e.g.: Name, function and operational contact data of the contact persons at our business partners)
- Bank details (e.g.: account holder, bank institute, IBAN, BIC of our business partners)
- Communication data (e.g.: Contents of business communication, circumstances of business communication)
- Credit assessment data (e.g.: credit reports provided by credit agencies)
- Contract data (e.g.: data from contract documents)
- Invoice data (for example: invoice date, invoice amounts, invoice items)
- Payment data (e.g.: payment date, payment amounts)
- Log data (e.g.: Data from logs about business content of appointments and meetings)
- Analytical data (e.g.: data from analyses of the business structure of companies)
- Survey data (e.g.: Responses to our surveys for voluntary assessment of the business relationship)

## 3. The recipients of your personal data, including transfers to a third country

Only to the extent necessary for the above-mentioned purposes, the following categories of recipients receive personal data from us:

- Westlake and any Westlake affiliate. In order to meet the needs of its customers, many of which are also international companies, Westlake and its affiliates operate as a matrix organisation and may require an exchange of information between different Westlake companies, in particular with Westlake Corporation and Westlake affiliates in the United States. This exchange of information is legitimized by concluded EU standard contractual clauses.

In this notice, “Westlake” and “Westlake affiliate” refers to (i) Westlake Corporation (ii) any company or partnership in which Westlake Corporation now or in the future directly or indirectly owns or controls, more than fifty per cent (50%) of the ownership interest, having the right to vote or appoints its directors or functional equivalents (“affiliate”), or any joint venture in which Westlake Corporation or any Westlake affiliate has day to day operational control.

- Companies and service providers cooperating with us outside our group of companies
- Identification service provider
- Shipping service provider



- Billing and payment processing service provider
- Accounting service provider
- Archiving service provider
- Disposal service provider
- Survey service provider
- Signature service provider
- Credit bureaus
- Courts
- Lawyers
- Tax consultant
- Certified Public Accountant
- Regulatory authorities and other public bodies

#### **4. Transfer of your personal data to a third country**

As explained in par. 4, Westlake and its subsidiaries operate under a matrix organizational structure whereby employees are expected to coordinate and interact with colleagues, managers, and senior leadership in international locations for operational and other business purposes. We have entered into contractual commitments with Westlake Corporation and Westlake affiliates to secure your personal data in accordance with applicable law. We, along with Westlake and Westlake affiliates, are committed to maintaining stringent privacy and security practices.

There is no adequacy decision by the EU Commission within the meaning of GDPR and UK-GDPR for transferring personal data to Westlake or Westlake affiliates in the USA. This transfer of personal data to Westlake and its U.S.-based affiliates is subject to standard contractual clauses pursuant to GDPR and UK-GDPR. A copy of the standard contractual clauses can be obtained via [privacy@westlake.com](mailto:privacy@westlake.com).

#### **5. Means of the processing**

The processing of your personal data is carried out by either automated and non-automated means, either in digital and paper format, always respecting the rules of confidentiality and security provided for in the Regulation and in any other current legislation. Your personal data may be processed by specifically authorized subjects (natural and/or legal person) within the framework of this privacy statement, such as our employees.

#### **6. Data retention period**

As a matter of principle, we only store personal data for as long as is necessary to achieve the above-mentioned purposes. Depending on the type of data, there may be statutory retention obligations that make it necessary to retain the data even if the actual processing purpose for which we collected the data has already been fulfilled.

#### **7. Your rights**

Your data will be processed lawfully, fairly and in a transparent manner. You have the following rights, which may be exercised at any time: (1) the right to lawful access to your personal data; (2) the right to rectify your inaccurate personal data and supplement incomplete personal data; (3) the right to erase your personal data if there is no (longer a) lawful ground for us to process your personal data and withdraw your consent where the processing was based on your consent (without affecting the lawfulness of processing based on consent prior to your withdrawal); (4) the right to restrict the processing of your personal data (and unless we have compelling legitimate grounds



for the processing, we will then cease the processing); (5) the right to data portability; (6) the right to object to the processing of your personal data; (7) the right not to be subject to an automated individual decision-making, including profiling; and (8) the right to lodge a complaint with a data supervisory authority (EU/EEA) or the Commission (UK). You are also entitled to send us specific instructions regarding the use of your personal data after your death.

To exercise your legally protected privacy rights, you may contact your Westlake business contact or send an e-mail to the following address: [privacy@westlake.com](mailto:privacy@westlake.com).