



Data Privacy Notice for Contractors LGPD

Policy Owner: Eric Blanchard, VP General Counsel & Secretary

Reviewed: June 29, 2020

Effective:

Supersedes: New

Information on the Processing of Personal Data Related to the Below Olin Entities as Subject to the LGPD:

- **Olin Corporation**
- **Blue Cube Brasil Comercio de Produtos Químicos Ltda.**
- **Sao Paulo Branch of Blue Cube Brasil Comercio de Produtos Químicos Ltda.**
- **Bahia Branch of Blue Cube Brasil Comercio de Produtos Químicos Ltda.**
- **Parana Branch of Blue Cube Brasil Comercio de Produtos Químicos Ltda.**

This communication is to provide you important information about the processing of your personal data in the course of the contractual relationship with one of the Olin entities of Olin Brazil, which includes the transfer to and processing by and among Olin Corporation and its subsidiaries (collectively, referred to as “**Olin**”).

Controller. The respective Olin Brazil company that you contract with from the above list, which will be represented hereto by Blue Cube Brasil Comércio de Produtos Químicos Ltda., Headquartered at Av. Engenheiro Luiz Carlos Berrini, 550 - Cidade Monções - São Paulo/SP, ZIPCODE 04571-000, together with Olin Corporation, 190 Carondelet Plaza, Suite 1530, Clayton, MO 63105, United States of America will act as the joint controllers of the processing of your personal data. Olin will be responsible for any requests in relation to the data processing and will provide you with the relevant information in this regard. However, you may exercise your rights described at the end of this Information also towards Olin.

Data Protection Officer. Olin has appointed Megan Rosenberg, dpo@olin.com or +1.314.355.8285 as the Olin Global Data Protection Officer.

Purpose of use and legal basis for processing the data

Your personal data may be processed for the purpose of

- execution and administration of the contractual relationship with you and/or your company, in particular administration of procurement, contracting and deliveries, accounting, billing, and payment processing;
- granting you access to our facilities by issuing entry cards or by other means, if applicable;
- granting you access to our onsite infrastructure, such as machinery and laboratories, which entails processing of your access information and/or documentation of your data by Olin’s systems, and may include processing your personal data for work place safety reasons, such as incident reporting for future prevention, if applicable;
- granting you access to our IT infrastructure, if applicable, which also entails any services provided to you with regard to software, hardware and/or file management support through our help desks, IT services, and/or competent departments;

- administration of supplier relationships, i.e. enhancing the relationship through marketing activities, including but not limited to sending of product information and event invitations;
- listing you in our supplier databases, if applicable;
- environmental, health and safety legal and regulatory compliance, which may include processing data for the security of the working environment, maintenance of medical and sickness records, installing occupational health programs, keeping emergency contacts, among other related activities;
- audits, which may require that Olin processes your personal data for background checks, including credit checks, corporate compliance, regulatory and/or export compliance, which entails the fulfillment of legal tasks including investigating and responding to claims against the company and its customers and employees, handling complaints, internal audits, third party audits, including anticorruption screening, if applicable, as well as third party due diligence.

Legal Basis for Processing. Your personal data is processed in accordance with Art. 7 of the LGPD for (i) the performance of the contractual relationship; (ii) to the extent we are required to process your personal data in order to comply with a legal obligation; (iii) or for the purposes of the legitimate interests pursued by us or by a third party. In exceptional cases, to the extent the processing of your personal data is not strictly required to execute the contractual relationship with you, to comply with legal obligations or to pursue our legitimate interests, we may ask you for your consent to process your personal data. Finally, we may need to transfer your personal data, for the same purposes mentioned in the previous section, to another group company or to other recipients based on one of the three legal hypothesis listed above or under your free, informed and unambiguous manifestation.

Source of data. We have received your personal data mainly because you provided it to us or we have been collecting it or supplemented the data during the course of the contractual relationship with our contractor for whom you are acting as an employee, sales representative or in a comparable function. We may also receive personal data from industry associations, business networks or publicly available sources, such as the Internet.

Recipients. Your personal data will only be accessible to Olin, its subsidiaries, and competent employees, as well as external representatives that Olin engages, who are responsible for technical service and maintenance, legal, strategic business lead and database administration, as well as payroll, accounting and billing services. In addition, employees of Olin who are responsible for providing and maintaining our IT infrastructure and external IT service providers who are engaged to assist with hosting, software services or any kind of IT services may have access to your personal data.

International Transfer. Olin will transfer your personal data to Olin in the US, the European Union and other countries outside of Brazil where Olin's subsidiaries or external service providers are located. The transfer is based on intragroup processing agreements, specific contractual clauses and global corporate policies or on a service providers approved binding corporate rules.

Categories of data. We may process the following categories of personal data:

- First name, middle name, last name;
- Employing company, position, job title;
- Business contact details including mobile phone number and email address;

- Personal contact details, including your home address, mobile phone number, and email address;
- Work location, previous positions, career history, background check information;
- Time keeping information, attendance records, pictures;
- Work place safety incidents;
- Professional expertise.

Data Retention. Olin will retain your personal data for the time of the contractual relationship and an additional period after in order to comply with statutory storage periods. You may also contact Olin's Data Protection Officer in this regard.

Your rights. You are entitled to obtain from us, in relation to their personal data being processed by us, at any time and upon request either in writing or by e-mail to dpo@olin.com:

- A confirmation of the existence of the processing activity and access to your data:
 - immediately, in simplified form by safe electronic means or in printed format; or
 - by means of a clear and complete statement indicating the origin of the data, the inexistence of records, the criteria used and the purpose of the processing, subject to trade and industrial secrets, provided within up to fifteen (15) days as from the data subject's request by safe electronic means or in printed format.
- The correction of incomplete, inaccurate or outdated data;
- The anonymization, blockage or elimination of unnecessary or excessive data or of data processed in non-compliance with the provisions of the LGPD;
- The portability of your data to another controller provided that the processing is based on your respective consent or to execute a contractual relationship or a relationship prior to entering into contract with you and observing the business and industrial secrets, in accordance with the regulation of the ANPD;
- The elimination of the personal data processed with your consent;
- The information of the public and private entities with which we carry out the shared use of your data;
- The information on the possibility of not providing consent and on the consequences of the denial;
- The review of decisions taken solely on the basis of automated processing of personal data which affect your interests, including decisions designed to define your personal, professional, consumption and credit profile or aspects of your personality:
- The withdrawal of consent.

You have the right to lodge a complaint with the ANPD in relation to the processing of your personal data.

Statutory/contractual requirement. You may choose not to provide your personal data or provide incomplete personal data. However, you should be aware that we may not be able to engage in or continue a contractual relationship with you or your employer or provide information to you or your employer since your personal data is required for our administrative purposes or to fulfil statutory requirements.

Automated decision-making and profiling. Your personal data will not be used for automated-decision making. Olin is creating profiles in order to analyze details of the (pre-)contractual relationship.

Intention of processing for other purposes. Please note that we may use your personal data for other purposes than it was collected for. In case we decide to start such use, we will provide you with the relevant information on that purpose and other relevant information, prior to the use under a different purpose.