

# Privacy Statement



Last updated: June 17<sup>th</sup> 2020

Protection of your personal data is important to us. In this Privacy Statement we (“AkzoNobel” or “we” or “us”) explain how we process your personal data online and offline:

- through our websites (“Websites”);
- through our apps (“Apps”);
- through our social media channels (“Our Social Media”);
- through email messages that we send to you that link to this Privacy Policy (“Emails”);
- through services we provide to you (“Services”).

Collectively, we refer to the Websites, the Apps, Our Social Media, Emails, and Services as the “Services.”

## 1. Why do we process your personal data?

We may process your personal data for the purposes described below.



### To respond to your queries or communicate with you

We may process your personal data to respond to your inquiries and fulfill your requests, when you contact us via one of our online contact forms or otherwise (e.g., when you send us questions, suggestions, compliments or complaints, or when you request other information about our Services). We may process your name, title, (business or private) contact details (including your email address, telephone number, name of your company) and any other information that you may provide to us in the open field entry of the contact form.

We process this information based on your consent, which can be withdrawn by you at any time.



### For surveys or other (marketing) communication

With your consent, we may process your personal data to send you surveys on our products or Services, marketing communication, or to keep you updated on events, special offers, products and Services of AkzoNobel that may be of interest to you.

We may create profiles and analyze your interactions with our Services. This way we learn about your interests and can customize our communication to meet your personal interests.

We process your name, your email address and other (personal) data you may have shared with us.

We will engage in this activity with your consent, which can be withdrawn by you at any time.



**For the development and improvement of products and services**

We process aggregated personal data for various AkzoNobel business-related purposes, such as developing new products and Services, for enhancing, improving or modifying our Websites, Apps and other digital channels, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

We engage in these activities to manage our contractual relationship with you and/or because we have a legitimate interest.

When possible, we use aggregated data. Sometimes we process personal data such as your name, your email address, your IP address, gender, place of residence, digits of your zip code and any other information mentioned in this Statement or otherwise provided to us by you.



**For the technical and functional management of our Apps or Websites**

When you use our Services, we may collect certain information automatically from your device. We process this information to help you find information in a quick and easy way and to improve access to and functionality of our Websites, Apps or other digital channels.

We process this information for our legitimate business purposes.

The information we collect automatically may include information such as your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g., country or city-level location), and other technical information. We may also collect information about how you interacted with our Services, including webpages you accessed, and links clicked.



**When you create an account with us, to administer the account**

Upon your request, we can create a personal account for you to make the purchasing process easier for you.

We process this information based on your consent, which can be withdrawn by you at any time.

In that case we need to process your name, email address and any other information that is required for account creation. We also process your display name and your login data.



**When you purchase products, to process your order and manage our relationship with you**

We use personal data to process your purchase and to deliver your order, to report the status of your order and to contact you about the transaction.

We process your personal data to carry out our purchase agreement with you and to deliver your order to you.

For this purpose, we may process your name and address, contact details such as telephone number or e-mail address, credit card or other payment information, your acceptance of our applicable terms and conditions, and whether you want to receive our newsletter. We will also process information about what you have purchased from us and information through your

registered interactions with AkzoNobel websites and apps (for which we may use cookies), your shopping history, both online and offline (when making a purchase from a store).



**If you participate in prize contests, events, competitions, promotions and/or games of chance, to administer your participation**

With your consent, we can send you emails with promotions and invitations to participate in prize contests, events, competitions or games of chance. If you choose to participate in one of these activities, we need your personal data to be able to organize this.

We process this information based on your consent, which can be withdrawn by you at any time.

If you participate in any of these activities, we need your personal data to announce when you are a winner, to distribute the prizes and to measure the response to prize contests, events, competitions, promotions and or games of chance.



**Compliance with laws and legal obligations and protection of AkzoNobel assets and interests**

We will process your personal data as appropriate or necessary (a) under applicable law, including laws outside your country of residence and including e.g. counterparty due diligence, money laundering, financing of terrorism and other crimes; (b) to comply with legal obligations; (c) to respond to requests from public and government authorities; (d) to enforce our terms and conditions and other applicable policies; (e) to protect our assets and/or operations; (f) to protect our rights, privacy, safety or property, and/or that of yours or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain. We may also process aggregated data for audits, to verify that our internal processes function as intended and are compliant with legal, regulatory or contractual requirements, for fraud and security monitoring purposes, for example, to detect and prevent cyberattacks or attempts to commit identity theft.

We may process this information to comply with a legal obligation (a, b and c).

We may process this information for our legitimate business purposes (d, e, f and g)

If so required, we may process your name, your contact information, your correspondence with AkzoNobel, your use of any of our products and/or services and any other information mentioned in this Statement or otherwise provided to us by you, if such is required for one of the purposes mentioned in the previous paragraph.



**If you use our Apps, to share your content**

We may process your personal data if you use our Apps or Services, to save and share images, videos or other user generated content to enable you to share the data. In this instance we may process metadata within these images, videos or other user generated content (which may include

We process this information based on your consent, which can be withdrawn by

GPS location data and device identifiers (depending on your device's privacy settings) and such personal data as is included within the content of the images, videos or other user generated content. This may even include special category personal data (such as may be determined from a person's appearance on a photo or video, if voluntarily uploaded by you through our App). We may also process data that you provide to us via your social media accounts.

Should you wish to share any personal data concerning other persons than yourself through one of our Apps (e.g. through a photo or video), you should ensure that those other persons also consent to their data being uploaded to the App for the purpose of being shared. If you share a link through the App, this link may also be visible to others.

you at any time. We may also process the content you share through the App to improve our products, websites and apps. If we do so, we process this information based on our legitimate interest – i.e. to improve our products and to improve customer engagement.

In general, we will use the personal data we collect from you only for the purposes described in this Privacy Statement or for purposes that we explain to you at the time we collect your personal data. However, if permitted by applicable data protection laws, we may also use your personal data for other purposes, provided they are not incompatible with the purposes we have disclosed to you.

If you provide us with information about someone else, please ensure you have that person's permission to do so for the purposes detailed in this Privacy Statement. By providing personal data relating to another person, you confirm that you have their consent to do so or are entitled to consent to the processing on their behalf (for example for children for whom you have parental or guardian responsibility).



## 2. Cookies and similar tracking technology

On our Websites, Apps and Social Media channels, we may use cookies and other technology for our internal analytics purposes and to improve the quality and relevance of our products and our Services and to make our content and advertising more relevant to you.

We only use tracking cookies (cookies to provide you with relevant advertising, or technology that tracks your behavior), with your consent. For further information about the type of cookies we use, the reason why we use them, and how you can control your cookies, please see our [Cookie Statement](#).



## 3. With whom do we share your personal data?

We may share your personal data with:

- Our group companies, our third-party partners and suppliers, professional advisers (such as banks, insurance companies, auditors, lawyers, accountants or other professional advisers), and other parties (such as ICT, service providers, consulting or shipping providers), that process personal data on our behalf for purposes that are described in this Privacy Statement, in our Cookie Statement, or for the purposes notified to you when we collect your personal data. To ensure that your personal data is treated with a high level of protection, AkzoNobel has implemented the AkzoNobel Binding Corporate Rules ('[Privacy Rules for Customer, Supplier and Business Partner Data](#)'), which ensure that every AkzoNobel legal entity applies the same level of protection to personal data. We have also agreed technical, organizational

and contractual measures (such as data processing agreements) with third party suppliers to ensure that your personal data is exclusively processed for the purposes mentioned above and to ensure that your personal data is well secured;

- Any competent law enforcement body, regulatory, government agency, court, or other third party if we believe disclosure is necessary: (i) as a matter of applicable law or regulation; (ii) to exercise, establish or defend our legal rights; or (iii) to protect your vital interests or those of any other person;
- Other parties in connection with corporate transactions: we may also, from time to time, share your data in the course of corporate transactions, such as during a sale of a business or a part of a business to another company, or any reorganization, merger, joint venture, or other disposition of our business, assets, or stock, provided that we inform those parties that they can only process your personal data for the purposes disclosed in this Privacy Statement;
- Other parties, but only if you have consented to, or if you have instructed us to make such disclosure to such parties.



#### 4. Where do we store your personal data?

Due to our global way of operating, data you provide to us may be transferred to or accessed by AkzoNobel's affiliates and trusted third parties from many countries around the world. As a result, your data may be processed outside the country where you live, if this is necessary for the fulfillment of the purposes described in this Statement. Our main servers are in the European Economic Area, but our group companies and third-party suppliers operate around the world. This means that when we process your personal data, we may process it in any of these countries, subject to the following paragraph.

If you are residing in the European Economic Area: countries outside the European Economic Area may have data protection laws that are different to the laws of your country (and, in some cases, not as protective). However, we will always take steps to ensure that your information is processed by third parties in accordance with this Statement and that we comply with applicable legal requirements to ensure adequate protection for your information. We will ensure that if your data is transferred to another country, it will continue to receive adequate protection, through AkzoNobel's Privacy Rules for Customer, Supplier and Business Partner Data or through contractual arrangements with third parties. This may include implementing the European Commission's Standard Contractual Clauses for transfers of personal information, which require the recipient of the personal data, to protect the personal data they process in accordance with European Union data protection law.



#### 5. How do we secure your personal data?

Your personal data are treated confidential, and we have taken technical and organizational security measures against loss or unlawful processing of this data. We use several security techniques including secure servers, firewalls and encryption, as well as physical safeguard of the locations where data is stored.

You should be aware that the transmission of information via the internet is not completely secure. Although we will do what we reasonably can to protect your personal data, we cannot guarantee the security of any personal data that you disclose online. You accept the inherent security implications of using the internet and we will not be responsible for any breach of security unless we have been in breach of applicable laws, and then only to the limits set out in any relevant terms and conditions.



## 6. How long do we retain personal data?

We will retain your personal data for the period necessary to fulfil the purposes outlined in this Statement, unless a longer retention period is required or permitted by applicable law. For example, to provide you with a service you have requested or to comply with applicable legal, tax, or accounting requirements.



## 7. What requests can you make in relation to your personal data?

You have the following rights in relation to your personal data:

- You have the right to access, correct, update, or request deletion of your personal data. In addition, you can object to the processing of your personal data, ask us to restrict processing of your personal data or request portability of your personal data. You can exercise these rights by contacting us using the contact details provided below.
- You have the right to withdraw consent (“opt-out”) of marketing communications we send you at any time. You can exercise this right by clicking the unsubscribe or opt-out link in the emails we send you. To opt-out of other forms of marketing, please contact us using the contact details provided below.
- Similarly, if we have collected and processed your personal data with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent.
- Whilst we would prefer you to come to us first with any complaints, you have the right to complain to a data protection authority about our collection and use of your personal data. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.



## 8. Links to third party websites and social media (such as Facebook, LinkedIn etc.)

Our services may contain links to and from the services of our partner networks, advertisers, affiliates and members of our corporate group. If you follow a link to any of these, please note that these third parties should have their own privacy policies/terms of use, and we do not accept any responsibility or liability for them. Please check the privacy notices of these third parties before you submit any personal data to them.

We also offer the opportunity to create an account with us through your social network accounts (such as Facebook). This will save you time in creating the account, as your sign-on credentials will be imported from your social network account. Please note that when you use this "social sign-on" option, we may receive certain information via the social network, such as your name, age, location, preferences, occupation, and your other publicly available personal data. This information is not requested by us but is provided automatically by the social network using the social sign-on option. After having created your account, you will have the opportunity to supplement it with any information you want to share with us.



## 9. Personal data of children who are below the age of 16

If you are below the age of 16, we urge you to ask one of your parents or legal guardians and have their written permission before submitting any of your personal data to us.

If you are a parent, we recommend you monitor your child's use of our Services and ensure that we do not receive any personal data from your child without your written permission. If you have any question regarding your child's personal data, please contact us.



## 10. How to contact us

If you have any questions or concerns about our use of your personal data, please contact us using our [contact us](#) form or the following details:

Through mail:

Corporate Privacy Officer  
Akzo Nobel N.V.  
AkzoNobel Center  
Christian Neefestraat 2  
1077 WW Amsterdam  
The Netherlands

The legal entity that is responsible for the processing of your personal data as set out in this Privacy Statement is AkzoNobel N.V.