

Online Privacy Notice



Privacy Policy

§ 1 Information on the collection of personal data

- (1) Information is provided below on the collection of personal data while using our website. Personal data is any data that can be personally associated with you, for example name, address, e-mail addresses, user behaviour.
- (2) The controller pursuant to Article 4 (7) of the EU General Data Protection Regulation (GDPR) is EuroChem AG, Baarerstrasse 37, CH-6300 Zug (see our legal notice). You can contact our data protection officer Aleksander Puzanov at Aleksander.Puzanov@eurochem.ru or via our postal address, adding the wording "data protection officer".
- (3) When you contact us by e-mail or using a contact form, the data you give us (your e-mail address, and if applicable your name and phone number) is stored by us in order to answer your question. When storage is no longer necessary, we will delete the data collected in this way, or we will restrict the processing thereof, if statutory retention requirements apply.
- (4) If we make use of contracted service providers for individual functions of our web-based services or would like to use your data for advertising purposes, we will inform you in detail about the respective processes below. We also specify the defined criteria for the storage period.

§ 2 Your rights

- (1) We are required to recognise the following rights which you enjoy with respect to your personal data:
- right of access;
- right to rectification or erasure;
- right to restriction of processing;
- right to object to processing;
- right to data portability.
- (2) You also have the right to lodge a complaint about our processing of your personal data with a data protection supervisory authority.

§ 3 Collection of personal data when you visit our website

- (1) If you are using the website purely for informational purposes and do not register or transmit data to us in any other way, we only collect the personal data transmitted to our server by your browser. If you wish to view our website, we collect the following data that is technically necessary for us to display our website to you and ensure its stability and security:
- IP address
- date and time of the request
- time zone offset from Greenwich Mean Time (GMT)
- content of the request (specific page)
- HTTP status code



- transferred data volume
- the website from which the request comes
- browser
- operating system and its interface
- language and version of the browser software.
- (2) In addition to the data mentioned above, cookies are stored on your computer when you use our website. Cookies are small text files stored on your hard drive in association with the browser you use, through which particular data is transmitted to the location setting the cookie (in this case, by us). Cookies cannot run programs or transmit viruses to your computer. They serve to make the website more user-friendly and effective in general.

(3) Use of cookies:

- a) This website uses the following kinds of cookies, the scope and function of which are explained below:
- transient cookies (see b)
- persistent cookies (see c).
- b) Transient cookies are automatically deleted when you close the browser. These include session cookies in particular. They save a so-called session ID that links different requests from your browser to a common session. This means that your computer can be recognised when you return to our website. The session cookies are deleted when you log out or close the browser.
- c) Persistent cookies are automatically deleted after a set period, which can vary according to the cookie. You can delete the cookies at any time in the security settings of your browser.
- d) You can configure your browser settings according to your preferences and, for example, refuse to accept third-party cookies or all cookies. Please note that you may not be able to use all the functions of this website.
- e) We use cookies to identify you the next time you visit us, if you have an account with us. Otherwise you would have to log in each time you visit the site.
- f) The Flash cookies used are not captured by your browser but by your Flash plug-in. We also use HTML5 storage objects, which are stored on your device. These objects save the necessary data independently of the browser you use, and have no automatic expiry date. If you do not wish the Flash cookies to be processed, you must install a corresponding add-on, e.g.

https://support.google.com/chrome/answer/114836?hl=en&co=GENIE.Platform%3DDesktop (google)

https://support.mozilla.org/en-US/kb/settings-privacy-browsing-history-do-not-track (firefox)

https://support.microsoft.com/en-us/help/17479/windows-internet-explorer-11-change-security-privacy-settings (IE 11)

https://support.apple.com/en-gb/guide/safari/sfri35610/mac

You can prevent the use of HTML5 storage objects by setting your browser to the private mode. We also recommend that you regularly manually delete your cookies and browser history.



§ 4 Other functions and offers on our website

- (1) In addition to using our website purely for informational purposes, you may be interested in using a number of services we offer. To do so, you must generally provide further personal data, which we use to provide the respective service. The principles set out above apply for processing such data.
- (2) We sometimes use external service providers to process your data. They have been carefully selected and commissioned by us, are bound to our instructions and regularly monitored.
- (3) We may also transfer your personal data to third parties if we offer participation in promotions, prize draws, conclusion of contracts or similar services together with partners. You can find more information about this when you provide your personal data or below in the description of the offer.
- (4) If our service providers or partners are based in a country outside the European Economic Area (EEA), we will inform you of the consequences of such a situation in the description of the offer.

§ 5 Objection to or revocation of consent to the processing of your data

- (1) If you have given consent to the processing of your data, you may revoke it at any time. Once you have notified us of such revocation of consent, this will affect the lawfulness of processing your personal data.
- (2) If we base the processing of your personal data on a balancing of interests, you may lodge an objection to it being processed. This is the case, in particular, if processing is not necessary for the performance of a contract with you, which is always outlined by us in the subsequent description of the functions. If you lodge such an objection, we will ask you to cite the reasons why we should not process your personal data as we have previously done. If you submit a reasoned objection, we will review the facts of the situation and either stop processing your data, adjust the way in which we process it, or demonstrate our compelling legitimate grounds for continuing to process it.
- (3) You may of course object to the processing of your personal data for the purposes of advertising and data analysis at any time. You can notify us of your objection to the use of your data for advertising purposes by contacting the following department: Olivier Harvey, olivier.harvey@eurochemgroup.com, Marketing Department, EuroChem Group AG.

§ 6 Newsletter

- (1) With your consent, you can subscribe to our newsletter containing news and information about our latest offers. The promoted goods and services are named in the declaration of consent.
- (2) We use the double opt-in process for subscriptions to our newsletter. This means that after you subscribe, we send an e-mail to the e-mail address you provided asking for confirmation that you wish to be sent the newsletter. If you do not confirm your subscription within [24 hours], your data is made unavailable and automatically erased after a month. We also save the IP addresses you used and times of your subscription and confirmation. The purpose of the process is to verify your subscription and, if necessary, to investigate possible misuse of your personal data.
- (3) Only your e-mail address has to be disclosed for sending the newsletter. Other data indicated separately may be voluntarily disclosed and is used to contact you personally. Once we receive your confirmation, we store your e-mail address for the purpose of sending the newsletter. The legal basis for storing this data is Article 6 (1) (a) GDPR.



(4) You may revoke your consent to receiving the newsletter and unsubscribe to the newsletter at any time. To revoke your consent, click on the link provided in any newsletter e-mail, or send a message to the contact point specified in the legal notice.

§ 7 Google Analytics

- This website uses Google Analytics, a web analysis service provided by Google Inc. ("Google"). Google Analytics uses "cookies", i.e., text files stored on your computer, which enable an analysis of your use of the website. Data generated by the cookie about your use of this website is usually transmitted to a Google server in the U.S. and stored there. However, if IP anonymisation is activated on this website, Google will truncate your IP address within Member States of the European Union or other signatory states to the Agreement on the European Economic Area beforehand. Only in exceptional cases will the full IP address be transmitted to a Google server in the U.S. and truncated there. On behalf this operator of this website, Google will use this data to analyse your use of the website, compile reports about website activities, and provide the website operator with further services connected with website and Internet usage.
- (2) The IP address transmitted from your browser within Google Analytics is not merged with other data from Google.
- You can prevent the storage of cookies by configuring your browser software accordingly; please note, however, that in this case you may not be able to fully use all the functions of this website. In addition, you can prevent Google from collecting and processing the data generated by the cookie relating to your use of the website (including your IP address) by downloading and installing the browser plug-in available at the following link: https://tools.google.com/dlpage/gaoptout?hl=en-GB.
- (4) This website may use Google Analytics with the extension "_anonymizelp()". This ensures that the IP addresses are further processed in truncated form, which excludes the possibility of personal association. Any personal connection to the data collected about you will therefore be immediately excluded and the personal data will be immediately deleted.
- (5) We use Google Analytics to analyse use of our website and regularly improve it. We use the statistics obtained to improve our products and make them more interesting for you as a user. For the exceptional cases in which personal data is transmitted to the U.S., Google has committed itself to the EU-US Privacy Shield, https://www.privacyshield.gov/EU-US-Framework. The legal basis for the use of Google Analytics is Article 6 (1) (f) GDPR.
- (6) Information about the third-party provider: Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001.

Terms of service: https://www.google.com/analytics/terms/gb.html,

Overview of data privacy: https://support.google.com/analytics/answer/6004245?hl=en, and Privacy Policy: https://policies.google.com/privacy?hl=en-GB&gl=de.

(7) This website also uses Google Analytics for a cross-device analysis of visitor flows, which is carried out by means of a user ID. You can deactivate the cross-device analysis of your use in your customer account under "My data" - "Personal data".



§ 8 Social media

- 1. Social media plug-ins
- (1) We currently use the following social media plug-ins: Google+, LinkedIn, facebook, Twitter. We use the two-click solution for this. This means that when you visit our site, no personal data whatsoever will be initially transmitted to the plug-in providers. You can recognise the plug-in provider via the label on the box above its initial letters or the logo. We offer you the possibility of communicating with the plug-in provider directly via the button. The plug-in provider will only receive the information that you have visited the given page on our website, if you click on the demarcated field to activate it. The data specified in § 3 of this Policy is also transmitted. In the case of Facebook and Xing, according to the respective providers in Germany, the IP address is anonymised immediately after collection. When the plug-in is activated, your personal data is therefore transmitted to the respective plug-in provider and stored there (in the U.S., in the case of U.S. providers). Since the plug-in provider collects data using cookies in particular, we recommend that you delete all cookies before clicking on the greyed-out box above the security settings of your browser.
- (2) We have no control over the data collected or the data processing procedures, nor do we know the entire scope of data collection, the purpose of processing or the storage periods. We also have no information about the erasure of the collected data by the plug-in provider.
- The plug-in provider stores the data collected about you as user profiles and uses these profiles for the purposes of advertising, market research and/or the customised design of their website. Such an analysis takes place, in particular (even for users who are not logged in) to provide customised advertising and in order to inform other users in the social network about your activities on our website. You have the right to object to the creation of these user profiles, although you must contact the respective plug-in provider to exercise this right. Via the plug-ins, we offer you the opportunity to interact with social networks and other users so that we can improve our website and make it more interesting for you as a user. The legal basis for the use of plug-ins is Article 6 (1) (f) GDPR.
- (4) Data transmission takes place regardless of whether you have an account with the plug-in provider and are logged on there. If you are logged on to a plug-in provider, your data collected by us is directly associated with the account you have with the plug-in provider. If you click on the activated button and, for example, link the page, the plug-in provider also stores this data in your user account and communicates it publicly to your contacts. We recommend that after using a social network you regularly log out, but in particular before activating the button, since this enables you to avoid association with your profile by the plug-in provider.
- (5) You can find more information about the purpose and scope of data collection and processing by the plug-in provider in their privacy policies, which are given below. You can also find further information there on your rights in this regard and options for setting your privacy preferences.
- (6) Addresses of the respective plug-in providers and URLs with their privacy notices:
- a) Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, U.S.A.; https://policies.google.com/technologies/partner-sites?hl=en. Google has committed to the EU-US Privacy Shield, https://www.privacyshield.gov/EU-US-Framework.
- b) Twitter, Inc., 1355 Market St, Suite 900, San Francisco, CA 94103, U.S.A.; https://twitter.com/privacy. Twitter has committed to the EU-US Privacy Shield, https://www.privacyshield.gov/EU-US-Framework.



- c) LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, U.S.A.; http://www.linkedin.com/legal/privacy-policy. LinkedIn has committed to the EU-US Privacy Shield, https://www.privacyshield.gov/EU-US-Framework.
- d) Facebook Corporate Office Headquarters HQ. **Address**: 1 Hacker Way. Menlo Park, California 94025 USA. Corporate Phone Number: 1-650-308-7300. https://www.facebook.com

2. AddThis bookmarking service

- (1) Our websites also contain AddThis plug-ins. These plug-ins allow you to create bookmarks and share interesting content with other users. Via the plug-ins, we offer you the opportunity to interact with social networks and other users so that we can improve our website and make it more interesting for you as a user. The legal basis for the use of plug-ins is Article 6 (1) (f) GDPR.
- Via these plug-ins, your browser establishes a direct connection to the servers of AddThis and the selected social networking or bookmarking service, if applicable. The recipients receive the information that you have visited the given page on our website and the data specified under § 3 of this Policy. This data is processed on the servers of AddThis in the U.S. When you send content on our website to social networks or bookmarking services, a link can be established between visiting our website and your user profile on the relevant network. We have no control over the data collected or the data processing procedures, nor do we know the entire scope of data collection, the purpose of processing or the storage periods. We also have no information about the deletion of the collected data by the plug-in provider.
- (3) The plug-in provider stores this data as user profiles and uses these profiles for the purposes of advertising, market research and/or the customised design of their website. Such an analysis takes place, in particular (even for users who are not logged in) to provide customised advertising and in order to inform other users in the social network about your activities on our website. You have the right to object to the creation of these user profiles, although you must contact the respective plug-in provider to exercise this right.
- (4) If you do not wish to participate in this process, you can object to the collection and storage of data at any time by setting an opt-out cookie with future effect: http://www.addthis.com/privacy/opt-out. Alternatively, you can configure your browser to prevent the setting of a cookie.
- (5) For further information on the purpose and scope of data collection and its use by the plug-in provider as well as further information on your corresponding rights and options for setting your privacy preferences, contact: AddThis LLC, 1595 Spring Hill Road, Suite 300, Vienna, VA 22182, U.S.A., www.addthis.com/privacy.

3. YouTube videos

- (1) Our website includes YouTube videos, which are stored on http://www.YouTube.com and are directly playable from our website. These are all integrated in the "Extended Privacy Mode", i.e., no data about you as a user is transferred to YouTube if you do not play the videos. Only when you play the videos will the data referred to in paragraph 2 be transmitted. We have no control over this data transmission.
- (2) When you visit the website, YouTube receives the information that you have visited the given sub-page on our website. The data specified in § 3 of this Policy is also transmitted. This takes place regardless of whether YouTube makes a user account available, via which you are logged in, or no user account exists. If you are logged in to Google, your data will be directly associated with your account. If you do not wish to be associated with your profile when using YouTube, you must first log out before clicking the button.



YouTube stores your data as user profiles and uses these profiles for the purposes of advertising, market research and/or the customised design of their website. Such an analysis takes place, in particular (even for users who are not logged in) to provide customised advertising and in order to inform other users in the social network about your activities on our website. You have the right to object to the creation of these user profiles, although you must contact YouTube to exercise this right.

(3) Further information on the purpose and scope of data collection and processing by YouTube can be found in its privacy policy. You can also find further information there on your rights and options for setting your privacy preferences: https://policies.google.com/privacy?hl=en&gl=de. Google also processes your personal data in the U.S. and has committed to the EU-US Privacy Shield, https://www.privacyshield.gov/EU-US-Framework.

Use of Google reCAPTCHA

To protect user enquiries via our online contact form, LSW uses the reCAPTCHA service operated by Google, Inc. ("Google"). The prompts of reCAPTCHA are used to discern whether an entry is made by a human being or, improperly, via automated machine processing. The prompts include transferring IP addresses and any further data required by Google to provide the reCAPTCHA service. For this purpose, the data you enter will be transferred to Google, where it is further processed. By using reCAPTCHA, you agree that the recognition you have made will be incorporated in the digitalisation of old works. However, if IP anonymisation is activated on this website, Google will truncate your IP address within the Member States of the European Union or other signatory states to the Agreement on the European Economic Area beforehand. Only in exceptional cases will the full IP address be transmitted to a Google server in the U.S. and truncated there. On behalf of the operator of this website, Google will use such data to analyse the use of this service. The IP address transmitted by your browser as part of reCAPTCHA will not be merged with any other Google data. The data is subject to separate privacy regulations of Google. For further information on Google's privacy policies, please refer to: https://policies.google.com/privacy?hl=en&gl=de.

§ 9 Google Maps

This website uses the Google Maps API operated by Google, Inc. ("Google") to display geographical material visually. When using Google Maps, Google also collects, processes and uses data about the use of map functions by website visitors. Click on the following link for the terms of service for Google Maps: Google Maps Terms of Service. For further information on Googles's privacy policies, go to: https://policies.google.com/privacy?hl=en&gl=de.