

ECOLAB PRIVACY NOTICE



ECOLAB POLICY

Ecolab Inc. Global Privacy Policy

1.0 Purpose

Ecolab Commitment to Data Privacy Protection

The policy set forth below outlines the personal data that Ecolab may collect, how Ecolab uses and safeguards that data, and with whom we may share it. This policy is intended to provide notice to individuals regarding personal data in an effort to be compliant with the data privacy laws and regulations of the jurisdictions in which Ecolab operates.

Ecolab encourages our employees, independent contractors, customers, suppliers, commercial visitors, business associates, investors and other interested parties to read this policy. By using our website or submitting personal data to Ecolab by any other means, you acknowledge that you understand and agree to be bound by this policy, and agree that Ecolab may collect, process, transfer, use and disclose your personal data as described in this policy.

2.0 Personal Data

Ecolab is committed to maintaining all reasonable precautions to ensure the privacy and security of personal data gathered by Ecolab. During your use of our website or through other communications with Ecolab, personal data may be collected and processed by Ecolab. In general, Ecolab collects personal contact information (e.g. name, company, address, telephone number and e-mail address), which you knowingly provide either by registration, survey, answering questions or otherwise for use in our commercial relationship. At times we may collect additional personal data that you voluntarily provide, including, but not limited to, job title, additional contact information, date of birth, hobbies, areas of interest, and professional affiliations.

3.0 Use of Personal Data

Ecolab's website is intended to be used by Ecolab customers, commercial visitors, business associates, investors, and other interested parties for business purposes. Personal data collected by Ecolab through its website or by other means is used in support of our commercial relationship with you, including, but not limited to, the processing of customer orders, orders from vendors, managing accounts, learning about customers' needs, responding to inquiries, and providing access to information. Also, in compliance with the laws and regulations of the relevant jurisdiction to support our relationship with you:

- we may share personal data with our worldwide affiliates to better understand your business needs and how we can improve our products and services;
- we may use third party service providers to assist us in collecting, assembling or processing personal data in connection with services related to our business relationship;
- we (or a third party on our behalf) may use personal data to contact you about an Ecolab offer in support of your business needs or to conduct online surveys to understand better our customers' needs; and
- we may use personal data for marketing and promotional activities.

If you choose not to have your personal data used to support our customer relationship (especially direct marketing or market research), we will respect your choice. We do not sell your personal data to third parties, nor share it with third parties except as set forth in this policy. Ecolab will retain your personal data as long as you maintain a customer relationship with Ecolab and/or if you have registered to receive marketing or other communication from Ecolab, until such time as you request that we delete such personal data.

4.0 Third-Party Service Providers

Ecolab is the commercial operator of its website and uses service providers to assist in hosting or otherwise acting as data processors, to provide software and content for our sites and to provide other services. Ecolab may disclose personal data supplied by you to these third parties who provide such services under contract to protect your personal data. In addition, where consistent with the laws and regulations of the relevant jurisdiction, Ecolab may disclose personal data if such disclosure:

- is a use of the personal data for an additional purpose that is directly related to the original purpose for which the personal data was collected;
- is necessary to prepare, negotiate and perform a contract with you;
- is required by law or the competent governmental or judicial authorities;
- is necessary to establish or preserve a legal claim or defense;
- is part of a corporate restructuring, sale of assets, merger or divestiture; or,
- is necessary to prevent fraud or other illegal activities, such as willful attacks on Ecolab information technology systems.

5.0 International Data Transfer

For our customers in Switzerland and the European Union (EU), please note that Ecolab (as a US based company) operates also through its direct and indirect subsidiaries in countries outside of Switzerland and the EU (including the US) and may involve certain third parties (as described above). If you use our websites or web portals, all information, including personal information, may be transferred to Ecolab (including subcontractors that may be maintaining and/or operating our website) in the United States and elsewhere and may be transferred to third parties that may be located anywhere in the world. Although this may include recipients of information located in countries where there may be a lower level of legal protection for your personal information than in your location country, we will protect your information in accordance with requirements applicable to your information and/or location. Specifically, for data transfers out of the EU, Ecolab will utilize data transfer agreements containing the Standard Contractual Clauses. Further, as described below, Ecolab is certified via the EU-US Privacy Shield Framework. By using our websites or web portals, you unambiguously consent to the transfer of your personal information and other information to the United States and elsewhere for the purposes and uses described herein.

6.0 Non-Personal Data Collected Automatically

When you access Ecolab's our websites or web portals, we may automatically (i.e., not by registration) collect non-personal data (e.g. type of Internet browser and operating system used, domain name of the website from which you came, number of visits, average time spent on the site, pages viewed). We may use this data and share it with our worldwide affiliates and related service providers to monitor the attractiveness of our websites and improve their performance or content. In this case, processing is performed on an anonymous basis and at Ecolab's discretion.

7.0 Other Online Data

In addition, certain online technical applications or other interactions you have with Ecolab may require the entry of business and technical data. By providing the requested information, you are consenting to the processing and storage of such information by Ecolab. Unless Ecolab is advised that you want this information removed from Ecolab's server, such information may be retained by Ecolab and used for future commercial communications. A request for removal of this information can be made at the contact information provided below. Ecolab will take all reasonable precautions to assure that no such information will be provided or divulged to other third parties, except, if applicable, those third parties performing site hosting, maintenance, and related site service activities.

8.0 "Cookies" – Information Stored Automatically on Your Computer

Cookies are information stored automatically on a website user's computer. When a user views Ecolab's website(s), Ecolab may store some data on the user's computer in the form of a "cookie" to automatically recognize the user upon future visits to Ecolab's website(s). Ecolab will make reasonable efforts to ensure compliance with the laws and regulations of relevant jurisdictions with regard to cookies.

9.0 Children

Ecolab will not knowingly collect personal data from children under the age of 18. Ecolab's website(s) is not intended for individuals under 18 years of age.

10.0 Security and Data Integrity

Ecolab will take reasonable precautions to protect personal data in its possession secure against the risk of loss, misuse, unauthorized access, disclosure, alteration and destruction. Ecolab periodically reviews its security measures in an effort to ensure the privacy of personal data.

Ecolab will use personal data only in ways that are compatible with the purposes for which it was collected or subsequently authorized by you. While Ecolab will take reasonable steps to ensure that personal data is relevant to its intended use, accurate, complete, and current, Ecolab is also relying upon each individual to assist in providing accurate updates of his or her personal data.

11.0 Links to Other Websites

Ecolab website(s) may contain "links" to websites owned and operated by third parties. By accessing these links, which are provided for your convenience, you will leave our site and will be subject to the privacy practices of the other website. This policy does not apply to any personal information you provide to unrelated third parties.

12.0 Data Retention

In general, Ecolab will only retain personal data for as long as needed for the specific purpose of processing and in accordance with Ecolab's records management policy or as otherwise required by the laws and regulations of a particular jurisdiction. For example, data will be retained during the time period that you are authorized to use Ecolab website(s), including any Ecolab tools accessible through our website(s). Upon termination of such authorization, your personal data related to use of Ecolab website(s) will be removed.

13.0 Data Access and Correction

Upon request, Ecolab will grant individuals reasonable access to personal data that it holds about them. In addition, Ecolab will take reasonable steps to permit individuals to correct, amend, or delete information that is demonstrated to be inaccurate or incomplete. Ecolab also relies upon each individual to assist in providing accurate updates of his or her personal data. In order to access, correct, amend, or delete the personal data Ecolab holds about an individual, the individual should contact the following:

PHONE: +1-844-880-8355 | **EMAIL:** dataprivacy@ecolab.com

14.0 EU Data Privacy Rights

If your personal data is processed in the EU or you are a resident of the EU, the EU General Data Protection Regulation grants you certain rights under the law. In particular, the right to access, correct, or delete the personal data Ecolab holds about you.

To the extent required by applicable law, Ecolab will grant individuals reasonable access to personal data that Ecolab holds about them and will take reasonable steps to permit such individuals to correct, amend, or delete information that Ecolab holds about them. Ecolab also relies upon each individual to assist in providing accurate updates of his or her personal data. In order to access, correct, amend, or delete the personal data Ecolab holds about an individual, the individual should contact his or her Ecolab commercial contact or contact us at the following e-mail address: dataprivacy@ecolab.com

If you have a comment, question, or complaint about how Ecolab is handling your personal data, we invite you to contact us in order to allow us to resolve the matter. In addition, individuals located in the EU may submit a complaint regarding the processing of their personal data to the EU data protection authorities (DPAs). The following link may assist you in finding the appropriate DPA: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

15.0 EU - U.S. Privacy Shield

Ecolab complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. Ecolab has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

16.0 Privacy Shield Dispute Resolution and Arbitration

The Federal Trade Commission has jurisdiction regarding investigation and enforcement of Ecolab's compliance with the Privacy Shield. In compliance with the Privacy Shield Principles, Ecolab commits to resolve complaints about our collection or use of your personal information. Data subjects in the EU or EEA with inquiries or complaints regarding Ecolab's privacy policy and compliance with Privacy Shield should contact Ecolab's general data privacy contact at:

PHONE: 844-880-8355 | **EMAIL:** dataprivacy@ecolab.com

In addition, as a part of Privacy Shield compliance, personal data subjects may submit a complaint to an independent recourse mechanism. Ecolab commits to cooperate with the panel established by the EU data protection authorities (DPAs) and to comply with the advice given by the panel with regard to personal data transferred from the EU. The following link may assist you in finding the appropriate DPA:

http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm

Individuals located in the EU or EEA have the possibility, under certain conditions, to invoke binding arbitration for complaints regarding Privacy Shield compliance not resolved by any of the other Privacy Shield mechanisms. Information regarding arbitration can be found here: <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>

17.0 Changes to this Policy

Ecolab reserves the right to modify this policy from time to time in order that it accurately reflects the legal and regulatory environment and our data collection principles. When material changes are made to this policy, Ecolab will post the revised policy on our website.

18.0 Liability

In the event that Ecolab transfers personal data to a third-party service provider for processing on Ecolab's behalf and such third party processes the personal data in a manner inconsistent with the Privacy Shield Principles, then Ecolab will bear liability in accordance with applicable law and, if applicable, the terms of any relevant contract, unless Ecolab is not responsible for the event giving rise to related damages.

19.0 Ecolab Employee Data Privacy Compliance Manual

More information on the Ecolab Employee Data Privacy Policy can be found here: <http://www.ecolab.com/epp>.

20.0 Questions and Comments

If you have any questions or comments about this policy (e.g. to review and update, or remove your personal data from our database) please contact +1-844-880-8355 or dataprivacy@ecolab.com

21.0 EU – U.S. Privacy Shield Other Covered Entities

The following subsidiaries are also covered entities under the Privacy Shield listing of Ecolab Inc.:

Calgon LLC
E&M Bio-Chemicals, LLC
Ecolab Inc.
Ecolab USA Inc.
Fresno Energy LLC
Kay Chemical International Inc.
Microtek Medical Inc.
Nalco Cal Water LLC
Nalco Company LLC
Nalco Contract Operations, LLC
Nalco Crossbow Water LLC
Nalco Fab-Tech LLC
Nalco Industrial Outsourcing Company
Nalco Wastewater Contract Operations, Inc
Nanospecialties, LLC
Ones West Africa LLC
Process Water One
Quantum Technical Services, LLC
Res-Kem General Water LLC
RES-KEM LLC
Two LLC
Wabasha Leasing LLC