

## U.S. Privacy Policy

Last updated: August 2023

SysPro™ (also referred to herein as “we” or “us”) is a brand of products marketed and sold exclusively to U.S. consumers by MacDermid, Inc. This Privacy Policy (the “**Policy**”) details how MacDermid, Inc. processes personal data received about consumers (referred to herein as “**you**”) in connection with your use of [www.sysproproducts.com](http://www.sysproproducts.com) (the “Site”) and your rights and obligations in relation to your personal data. This Policy only governs personal data processed and collected for the Site, and does not cover any other MacDermid, Inc. websites, digital properties, products, services, or other privacy practices unaffiliated with this website and communications about this website.

SysPro considers privacy to be fundamental to our relationship with consumers.

This Policy also describes the measures we take to protect the confidentiality, integrity, and security of your personal data, our purposes for collecting such information, your rights regarding your personal data and the way to contact SysPro to exercise those rights. It also describes when we may disclose that information to affiliates and non-affiliated third parties.

This Policy and the policies described herein are subject to change at any time. If we make changes to this Policy, we will update the date it was last changed.

### **Children under the Age of 16**

Neither our website (the “Site”) nor any of the services we offer are intended for children under 16 years of age. No one under age 16 may provide any personal data to or on the Site. We do not knowingly collect personal data from children under 16. If you are under 16, do not use this Site. If we learn we have collected or received personal data from a child under 16 without parental consent, we will delete that information.

### **Collection of Information**

Depending on your relationship with us, we may collect and process data:

- By which you may be personally identified, such as name, postal address, e-mail address, telephone number, or any other information the Site collects or you submit to us that is defined as personal information or personally identifiable information under an applicable law or any other identifier by which you may be contacted online or offline (“personal data”);
- About your Internet connection, the equipment you use to access our Site, and usage details.

We may collect this information:

- Directly from you when you provide it to us;
- Automatically as you navigate through the Site. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.

We do not intentionally collect or process any **sensitive personal data** as that term is defined under any applicable state privacy law.

### **Retention of Information**

Your personal data will be retained only for as long as the information is needed to fulfill the purposes for which it is collected and processed. SysPro reserves the right to retain and use personal data for as long as necessary to comply with our legal and regulatory obligations and business requirements and/or to resolve any ongoing disputes and enforce our agreements. For the avoidance of doubt, data will not be destroyed before any regulatory retention period expires, or during a pending investigation, whether legal or regulatory.

To support us in managing how long we hold personal data and our record management, we maintain a data retention policy which includes clear guidelines on retention and deletion.

We consider the following criteria when determining how long a particular record will be retained, including any personal data contained in that record:

- How long the record is needed to provide you with the products and services you request
- How long the record is needed to support and enhance our operational processes
- How long the record is needed to protect our rights and legal interests
- How long the record must be retained to comply with applicable laws and regulations

The same personal data about you may be included in more than one record and used for more than one purpose, each of which may be subject to different retention periods based on the factors listed above.

### **Disclosure of Information to Third Parties**

We only disclose personal data in accordance with our Policy described herein and as permitted or required by applicable law.

We may disclose personal data to third parties under one or more of the following circumstances:

- To our subsidiaries and affiliates. We may disclose personal data to our affiliates in order to fulfill your requests or to provide you with information about other products and services that may be of interest to you.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal data confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of SysPro's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal data held by SysPro about our Site users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal data:

- To comply with any court order, law, or legal process, including a response for a government or regulatory request.
- To enforce or apply our terms of use and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of our customers, or others. (This includes exchanging information with other companies and organizations for the purposes of fraud protection.)

We do not sell your personal data or share your personal data for “cross-contextual behavioral advertising,” as those terms are defined under state privacy laws.

### **Notice for Overseas Users**

All of your personal data will be accessible from the United States and may be transferred within SysPro in order to present you the Site and offer you our products and services.

### **Protection of Information**

We maintain physical, electronic, and procedural safeguards designed to protect your personal data. We use reasonable best efforts to require that any person or institution to which we disclose personal data will protect the confidentiality of that information and use the information only for the purposes for which we disclose the information to them. In addition, we restrict access to nonpublic personal data to those employees who need to know that information in the course of their job responsibilities.

Unfortunately, the transmission of information via the internet is never completely secure. Although we try to protect your personal data, we cannot guarantee the security of your personal data shared with us via our Site or via email.

### **Additional Information for the Residents of California and Certain U.S. States**

This section is meant to provide supplemental or specific information for consumers that reside in states with comprehensive privacy laws that require additional disclosures to their residents.

### **Collection of Information**

The personal data we collect about you includes data within the categories below. The categories listed below are defined by California law and represent the categories of personal data that we have collected about you. These categories, however, also cover the types of personal data we collect from residents of other states, depending on our relationship and interactions with that particular individual. Where we collect this data, the purposes for which we process it, and how we have disclosed personal data to third parties in the past 12 months are consistent with how we treat other data under this Policy as described above. We do not necessarily collect all data listed in a particular category, nor do we collect all categories of data for all individuals. Please note that if you voluntarily provide additional information to us via email, those categories of data may not be captured in this chart. This chart only covers information we intentionally collect.

We have also disclosed data in each of the following categories with our affiliates and service providers for our business purposes within the last 12 months. We may receive requests for data from regulatory

authorities, our auditors and/or our legal advisors. If requested from such parties, we would disclose your personal data as appropriate.

We do not sell your personal data or share your personal data for “cross-contextual behavioral advertising,” as those terms are defined under California or other state comprehensive privacy laws.

<b>Category of Personal Data</b>	<b>Source of Personal Data</b>	<b>Purpose of Processing</b>
<p><b>Personal identifiers</b> such as a real name, alias, postal address, unique personal identifier, online identifier Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.</p>	<p>This information is collected directly from you or our service providers.</p> <p>This information may also be collected automatically through our Site via cookies or similar technologies.</p>	<p>We process this information in order to respond to you and provide you the information you requested.</p> <p>This information is also used for marketing purposes, including offering you opportunities or services that may interest you through both direct and business partner marketing.</p> <p>We collect IP address information via cookies on our Site to enable us to ensure our website functions appropriately and to monitor and improve user experiences on our Site. This information is collected and processed via cookies and similar technologies. You can control your cookie settings <a href="#">here</a>.</p> <p>This information is also processed in order to help detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and for compliance management.</p>

<p><b>Internet or other electronic network activity information,</b> including, but not limited to, browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement.</p>	<p>This information is collected directly from you, typically through the use of cookies and similar technologies.</p>	<p>This information is processed in order to enable us to ensure our website functions appropriately and to monitor and improve user experiences on our Site. This information is collected and processed via cookies and similar technologies. You can control your cookie settings <a href="#">here</a>.</p> <p>It is also processed in order to help detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and for compliance management.</p> <p>This information is also used for marketing purposes, including offering you opportunities or services that may interest you through both direct and business partner marketing.</p>
<p><b>Geolocation data.</b></p>	<p>This information is collected directly from you, typically through the use of cookies and similar technologies.</p>	<p>This information is processed in order to administer your relationship with us, including meeting our legal and compliance obligations and pursuing the efficient management of our business.</p> <p>It is also processed in order to help detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and for compliance management.</p> <p>This information is also used for marketing purposes, including offering you opportunities or services that may interest you through both direct and business partner marketing.</p>

<p><b>Audio, electronic, visual, thermal, olfactory, or similar information</b> (e.g., recorded phone calls with our customer service representatives)</p>	<p>This information is collected directly from you or our service providers.</p>	<p>This information is processed in order to administer your relationship with us, including meeting our legal and compliance obligations and pursuing the efficient management of our business. For example, if you call the toll-free number provided below to exercise your rights, that phone call may be recorded to enable us to monitor the performance and compliance of our customer service representatives.</p> <p>It is also processed in order to help detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and for compliance management.</p>
<p><b>Inferences</b> drawn from any of the information identified in this section to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes</p>		<p>This information is processed in order to administer your relationship with us, including meeting our legal and compliance obligations, pursuing the efficient management of our business, and providing you with benefits and services, as applicable.</p> <p>This information is also used for marketing purposes, including offering you opportunities or services that may interest you through both direct and business partner marketing.</p>

We do not process any of your **sensitive personal data** as that term is defined under California or other state comprehensive privacy laws.

**Consumer Privacy Rights**

Depending on your jurisdiction, subject to certain exceptions as set forth by law, you may have the following rights with respect to personal data about you:

- A. **Right of access/Right to know** – You may be entitled to request that we tell you the specific pieces of personal data we have collected about you, the categories of sources from which the information was collected, the purposes of collecting the information, the categories of third parties we have disclosed the information to, and the categories of personal data that have been

disclosed to third parties for a business purpose. Before providing any of this information, we must be able to verify your identity.

- B. **Right of data portability** – In some instances, you may have the right to receive the information about you in a portable and readily usable format.
- C. **Right to have personal data erased** – Subject to certain conditions, you may be entitled to request that we delete personal data about you. We will not delete personal data about you when the information is required to fulfill a legal obligation, is necessary to exercise or defend legal claims, or where we are required or permitted to retain the information by law.
- D. **Right to correct** – To the extent the personal data about you that we maintain is incorrect, you may be entitled to request that we correct that inaccurate personal data.
- E. **Right to appeal** – In the event we fail to respond to your request within the timeline specified below, or we deny your request, you have the right to appeal that decision.

If you chose to exercise any of these rights, we will not discriminate against you on the basis of choosing to exercise your privacy rights.

#### Verification of your request

Before providing you with the above rights, we must be able to verify your identity. In order to verify your identity, you will need submit information about yourself, including, to the extent applicable, providing your account login credentials or other account information, answers to security questions, your name, government identification number we already have on file, date of birth, contact information, or other personal identifying information. We will match this information against information we have previously collected about you to verify your identity and your request. To the extent you maintain an account with us, we will require you to login to that account as part of submitting your request. If we are unable to verify your identity as part of your request, we will not be able to satisfy your request. We are not obligated to collect additional information in order to enable you to verify your identity. For deletion requests, you will be required to submit a verifiable request for deletion and then to confirm separately that you want personal data about you deleted.

If you would like to appoint an authorized agent to make a request on your behalf, we require you to verify your identity with us directly before we provide any requested information to your approved agent. Alternatively, your authorized agent may provide evidence of having power of attorney or acting as a conservator for you. Note that we may require you to verify your identity with us directly before we provide any requested information to your authorized agent unless your authorized agent has power of attorney or acts as a conservator, in which case we will not contact you directly. We may also request that any authorized agents verify their identity and may reach out to you directly to confirm that you have provided the agent with your permission to submit the request on your behalf.

#### How to make your request

Consumers may be entitled to make up to two requests per calendar year, free of charge. You will be charged a fee for subsequent requests exceeding this limit. Under applicable privacy law, and for the protection of your personal data, we may be limited in what personal data we can disclose.

In your request, please attest to your state of residency and provide a current address for your response. You may request this information in writing by contacting us at [support@sysproducts.com](mailto:support@sysproducts.com) or calling our toll-free number at 1-888-411-1652. Requests to appeal previously submitted consumer rights requests can be submitted in the same way. Please indicate in your request that you are submitting an appeal request.

We will maintain a record of your privacy rights requests for at least 2 years. This information will not be used for any other purpose except to review compliance processes; it will not be shared except as necessary to comply with a legal obligation.

#### When can you expect to hear from us

We will confirm receipt of your request within 10 business days and provide information about how we will process the request, including the verification process and expected response time. Please allow up to forty-five (45) days for a response, from the day the request is received. We may require an additional forty-five (45) calendar day extension.

If you submit a request to appeal any decision we have made with regard to prior consumer rights request you submitted, we will respond to that appeal within sixty (60) days and inform you of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If we deny your request we will also provide you with instructions on how you may contact your state Attorney General to submit a complaint.

#### **Choices About How We Use and Disclose Your Information**

We strive to provide you with choices regarding the personal data you provide to us. We have created mechanisms to provide you with the following control over your information:

- Tracking Technologies and Advertising. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your cookie settings, visit the settings option on your browser. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.

We do not control third parties' collection or use of your information to serve interest-based advertising. However these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

#### **Contacting SysPro**

This Policy may be amended from time to time, at our discretion. The most up to date version of this Policy will be posted on our Site with the date the Policy was last updated indicated. Consumers may contact SysPro in order to exercise any of their rights set forth in this Policy by calling us at 1-888-411-1652 or by emailing [support@sysproproducts.com](mailto:support@sysproproducts.com).

You may also write to us at:

245 Freight St, Waterbury, CT 06072