



Ecolab's Commitment to Data Privacy Protection

As a B2B company, Ecolab and its various affiliates worldwide ("Ecolab") regularly receive data from commercial partners. Only very rarely do these data flows include any personal data concerning our commercial partners' employees. Nevertheless, please be assured that protection of the personal data of our commercial partners' employees is in compliance with applicable privacy laws, such as the General Data Protection Regulation ("GDPR"), and is a top priority at Ecolab. On those rare occasions when Ecolab does receive personal data from a commercial partner, Ecolab takes great care to use and safeguard such personal data in a compliant manner. The purpose of this communication is to outline relevant policies, processes and procedures that Ecolab utilizes to maintain such compliance.

If you have any questions about the personal data that Ecolab may process, how Ecolab uses and safeguards that data, and with whom we may share it, you can find that information in our posted Privacy Policy, available at www.ecolab.com/privacy-policy. Ecolab encourages our customers, suppliers, commercial visitors, business associates, investors and other interested parties to read this Privacy Policy. Please note that Ecolab continuously monitors legal developments and updates the Privacy Policy as necessary.

GDPR Compliance Efforts

Ecolab has engaged relevant experts, and a project team continuously works to maintain compliance with relevant privacy compliance laws and to implement key solutions around data subject notices, internal policies and procedures, and third-party engagement for processing. Ecolab's primary compliance efforts include, but are not limited to, the following:

- Continued investment in our security infrastructure and technical and organizational capabilities;
- Ongoing review of our processing activity to evaluate data privacy compliance across all activities;
- Evaluation of data protection-related contractual terms in agreements with relevant data processors, including the support of compliant internal and international data transfers by executing Standard Contractual Clauses and applying EU-US privacy shield procedures;
- Updating of legally required notices and internal procedures to provide appropriate data subject rights under privacy laws such as GDPR.

General Data Privacy Principles

Ecolab is committed to the goal of adhering to the following Privacy Principles in all processing of personal data.

- Processing data lawfully, fairly, and in a transparent manner.
- Processing data in a manner that is consistent with the purpose for which it was collected.
- Limiting collection of data to what is necessary for the purpose of collection.
- Keeping personal data accurate.
- Deleting data when it is no longer needed in accordance with applicable law and Ecolab's record management policy.
- Using appropriate security measures to protect against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical and organizational measures.

In an effort to be fully transparent with regard to our data processing, you can find more information about our processing of personal data on the following page.

Data protection information for Data Subjects

Consistent with Ecolab's Privacy Policy, Ecolab would like to provide the following information regarding the data subjects of our commercial partners.

1. *Responsibility for data processing*

Responsibility for your data processing lies with the local Ecolab-group entity to which your personal data was originally provided.

2. *Sources and data Ecolab uses*

In general, Ecolab processes personal contact information (e.g. name, company, address, telephone number, 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, and professional affiliations.

3. *Purpose of the processing and legal basis*

Personal data processed by Ecolab is used in support of our commercial relationship with our commercial partners, 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. We process the aforementioned personal data in compliance with the provisions of the GDPR as well as the data privacy laws and regulations of the jurisdictions in which Ecolab operates (e.g., for the performance of a contractual obligation (Art. 6 (1) b) GDPR).

4. *Data recipients*

In compliance with the laws and regulations of the relevant jurisdiction, we may share personal data with our worldwide affiliates to better understand the our commercial partners' business needs and how we can improve our products and services; we may use third party service providers to assist us in 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 our commercial partners' 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 commercial 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 statement.

5. *Data transfer to third countries*

Personal data provided to Ecolab may be transferred out of the EU, including to the United States. Such transfer takes place consistent with GDPR via use of the EU Standard Contractual Clauses and in line with Ecolab's Privacy Shield registration.

6. *Duration of storage*

In general, Ecolab will only retain personal data 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.

7. *Your rights*

Upon request, Ecolab will grant data subjects 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 primary commercial contact or use the contact information available at www.ecolab.com/privacy-policy. Finally, while we encourage you to contact Ecolab to resolve any questions or comments regarding your personal data, you may submit a complaint regarding the processing of your personal data to the EU data protection authorities.

8. *Obligation to provide data*

Generally, while you are under no obligation to provide personal data to Ecolab, we must have certain pieces of personal data in order to provide services to our commercial partners. If you do not provide Ecolab some personal data, it may be impossible for us to provide these services. The personal data needed in a relationship with an individual commercial partner may vary, and you may inquire with Ecolab at any time regarding the specific pieces of personal data needed for the commercial relationship.