

## Privacy Policy

PQ Corporation, including its affiliates and subsidiaries, (collectively “**PQ Corporation**” or “**PQ**” or “**We**”) is committed to protecting your privacy. The purpose of this Privacy Policy (“**Policy**”) is to notify you of the types of personal information that we may collect from you or that you may provide to PQ Corporation and the practices that will govern the processing of such personal information.

Please read this Policy carefully to understand PQ Corporation’s policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, it is your choice not to use our website(s) ([www.pqcorp.com](http://www.pqcorp.com) or “**Website**”) or not to provide your information to PQ Corporation. By accessing and using the Website or otherwise providing your personal information to PQ Corporation, you agree to this Policy and consent to the personal data collection, use, and disclosure practices described herein. This Policy may change from time to time, your continued use of PQ Corporation’s Website or services after we make changes is deemed to be acceptance of those changes, please check the Policy periodically for updates.

### **Scope**

This Policy applies to personal information that is collected from customers, employees, Website visitors, and job applicants through PQ Corporation’s Website or other electronic means.

This Policy does not apply to personal information collected by any third party, including through any application or content (including advertising) that may link to or be accessible from or on the Website.

### **Information we collect**

PQ Corporation collects and uses personal information differently depending on whether you are an employee, job applicant, business partner, or visitor to PQ’s Website. Please review the section below consistent with your relationship with PQ Corporation and use of our Website.

### **Business Partners**

PQ Corporation may collect personal information of current or prospective business partners including customers, suppliers, vendors, service providers, and visitors to a Website.

### *Information We Collect*

- Your name and contact information including your name, email address, mailing or physical address, company, and telephone number may be collected through forms that you submit to PQ Corporation through our Website or other electronic means. This contact information is used to establish and maintain business communications needed to provide or receive goods or services. For customers, the communications may also include offering products or services that may be of interest to you. Depending on your

relationship with PQ, your tax identification may be collected as needed for tax reporting purposes.

- Your interest in PQ Corporation's products or services may also be collected based on forms or survey responses you submit to PQ Corporation through our Website or other electronic means, including products or services previously purchased or considered. Product interests may also be collected through interactions with a representative of PQ Corporation including a sales person, technical service person, customer service, or other. Your product interest is used to provide you with information concerning products or services that We believe may be of interest to you.
- Information about your access device and access will be collected and logged when you access or interact with a public PQ Corporation system, including our Website. This information may be used as needed for troubleshooting and maintaining reliable operation of the systems. It is also available for security purposes or forensics investigations if needed.
- Depending on the services being provided and access granted to PQ Corporation systems, resources, or property, your personal information may be used to conduct a background check for security purposes. Background checks utilize publicly available information including information you voluntarily made public. For example, information you have shared on social media platforms, specifically publicly visible accounts (i.e. LinkedIn). Backgrounds checks are typically conducted by third-party service providers and subject to the standard terms of such providers.

### **Employees and Prospective Employees**

PQ Corporation collects the personal information of job applicants, current employees and former employees.

We collect personal information using various methods and sources. The personal information may be collected directly from you when you voluntarily provide us with your personal information by submitting the information on forms or by contacting PQ Corporation through email, phone, our Website or a similar method. We may also receive your personal information from an employment agency, payroll or job recruiting service provider.

#### *Information we collect*

- Your name and contact information including your email address, mailing or residential address, and telephone number may be collected as needed in order to establish and maintain business communications needed to process an application or manage the employment relationship.

- Starting with the job application and throughout an individual’s pre-employment and employment lifecycle, additional personal information may be collected from job candidates or employees, which may include, among other things, government issued tax id, driver’s license numbers, education history, certificates, employment history, skills inventory, and performance reviews.
- Personal information, may be collected from job applicants to evaluate the job applicant’s viability for the job and process the application throughout the recruitment process. Personal information collected from employees is used to manage their employment, compensation, benefits, payroll, training, career development, and comply with all applicable legal obligations including required regulatory reporting to appropriate authorities. For more detailed information on the personal information collected and collection method, employees, previous employees and applicants should consult with their local or respective Human Resources department.
- With an individual’s authorization, the individual’s personal information may be used to conduct a background check for security purposes. Background checks utilize publicly available information including information you voluntarily made public. For example, information you have shared on social media platforms, specifically publicly visible accounts (i.e. LinkedIn). Backgrounds checks are typically conducted by third-party service providers and subject to the standard terms of such providers. You should review the privacy policies of such service providers before consenting to a background check.

Information about your access device and access will be collected and logged when you access or interact with a PQ Corporation system such as the Website. This information is used as needed for troubleshooting and maintaining reliable operation of the systems. It is also available for security purposes and forensics if needed.

### **Other Potential Information Collection**

While generally not collected by PQ Corporation, the following information may be collected and used in certain circumstances:

- **Cookies:** By accessing our Website, you consent to us using cookies in accordance with our Cookie Policy, available at [PQ Cookie Policy](#).
- **Protected Classifications under California or federal law:** Examples include age, date of birth, gender, military or veteran status, marital status, nationality, citizenship, pregnancy and related medical conditions, genetic information or other similar identifiers. This data may be collected in the course of providing services or products,

background checks, human resources purposes, security, or to comply with all applicable legal obligations.

- **Internet or other electronic network activity information:** Examples include information including (but not limited to) browsing history and search history. This information may be used for Security purposes, including to prevent unauthorized access or disclosure, to maintain data accuracy, to protect the confidentiality, integrity and availability of your personal information and to allow only the appropriate use of your personal information or to improve our website, services and products, through testing, research, analysis and product development.
- **Inferences drawn from any of the information identified in the above categories used to create a profile about a customer.** This information may be used to provide the services or products or customer service.

### **Data Sources**

In addition to the avenues described above, PQ Corporation may obtain your personal information from the following sources:

1. Directly from you (whether you are a customer, employee, applicant or prospective employee), when you voluntarily provide us with your personal information. For example:
  - a. When you submit information on forms.
  - b. When you contact PQ Corporation via our website, email, phone or other similar methods.
  - c. When you register your identity for authenticating to computerized system (i.e. timeclock, network, access control, submit information on forms). See vendor information.
2. Directly or indirectly from vendors, service providers or other third parties. For example:
  - a. Our business customers or our service providers (in the course of or as part of the provision of services).
  - b. Information you voluntarily made public (i.e. for our use in background checks).
  - c. Information you have shared on social media platforms, specifically publicly visible accounts (i.e. LinkedIn).
  - d. Information you have provided to a recruiting service provider.
3. From your use, visit or activity on any of our websites. For example:
  - a. Directly (through your submission of information).
  - b. Indirectly (through information disclosed by your device or browser, such as an IP address)

### **With Whom We Share Your Personal Information**

PQ Corporation may share your personal information, as described above, solely with the following third parties:

1. Service Providers (including, contractors, service providers, and other third parties) as needed in performing the contracted work.
2. Affiliates/Subsidiaries and Related Entities.
3. Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.
4. External advisors, such as auditors or outside legal counsel.
5. Governmental, legal, regulatory, or other similar authorities and/or local government agencies, upon request or where required.

***PQ Corporation does not sell personal information to anyone.***

### **Your Rights Regarding Your Personal Information**

This section applies to you if you are a natural person who lives in California, as defined in the California Consumer Privacy Act (CCPA), a natural person who resides in Canada or does business with PQ's Canadian facilities, as set forth in the Privacy Information and Electronic Documents Act (PIPEDA), or a natural person in the European Union, as defined in the General Data Protection Regulation (GDPR). The CCPA, PIPEDA and GDPR provide you various Privacy-Related Rights ("Rights") with respect to your personal information. This section provides you with general information regarding these Rights. The following resources include more specific information about the CCPA, PIPEDA and GDPR, and your respective rights thereunder (if applicable):

**CCPA:** <https://www.oag.ca.gov/privacy/ccpa>

**PIPEDA:** <https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/the-personal-information-protection-and-electronic-documents-act-pipeda/>

**GDPR:** [https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens_en)

**Right to Notice:** At or before the point of collection of personal information, customers, Employees, Job Applicants and other individuals residing in the State of California are entitled to a notice that provides the categories of personal information collected about them, and the purposes for that collection.

**Right to Know/Right to Access:** A customer has the right to request information regarding our collection, disclosure, sale and/or use of their personal information over the previous twelve (12) months. A customer may request that PQ Corporation disclose:

- Categories of personal information that We have collected about you;
- Categories of sources from which your personal information is collected;
- Categories of personal information about you that We have sold or disclosed for a business purpose;

- Categories of third parties to whom the personal information was sold or disclosed for a business purpose;
- The business or commercial purpose for collecting or selling personal information; and
- Specific pieces of personal information that We have collected about you.

When providing you with your information electronically, PQ Corporation will, to the extent possible, deliver the information in a portable manner that allows you to transfer the information to another entity.

PQ Corporation may reject your request to know if your identity cannot be verified (your request is not a verifiable customer request), or if the information has already been provided twice within a twelve (12) month period. PQ Corporation may also refuse to provide you with specific pieces of information that We have collected about you if disclosure creates a substantial, articulable, and unreasonable risk to the security of that personal information, your account with PQ Corporation or the security of our systems.

**Right of Deletion:** A customer has the right to request the deletion of any personal information that We have collected from them, or that We maintain about them. Following our receipt of your verifiable customer request, PQ Corporation will delete (and direct our Service Providers to delete) your personal information, subject to the exceptions permitted under the CCPA, PIPEDA, GDPR, or other applicable privacy law, and any legal obligations that We have to retain that information.

**Right to Opt-Out of the Sale of your Personal Information:** The CCPA provides a customer with the right to opt-out of the sale (as defined under the law) of his/her personal information. PQ Corporation does not sell personal information, and thus does not provide you with a mechanism for opting-out.

**Right to Non-Discrimination:** PQ Corporation will not discriminate against a customer in response to the decision to exercise any of the privacy rights granted to you under the CCPA.

**Asserting Your Rights - Submitting a Request to Know or Delete:** As previously stated, PQ Corporation may reject your request if We cannot verify your identity. Please follow the instructions below, and provide the requested information to allow us to adequately address your request.

1. If you are a current or former employee of PQ Corporation residing in the State of California, Canada or European Union, you may submit your request via email at [webenhance@pqcorp.com](mailto:webenhance@pqcorp.com). In the email, please indicate which Right you are exercising. In order to verify your identity, your request must include the following:
  - a. Your full name and email address associated with your profile;
  - b. Your preferred contact phone number; and
  - c. Your hire date. Where possible, we require your hire date to be provided in the MM/DD/YY format.

2. If you previously applied for employment with PQ Corporation (job applicants) and reside in the State of California, Canada or European Union, you may submit your request via email at [webenhance@pqcorp.com](mailto:webenhance@pqcorp.com). In the email, please indicate which Right you are exercising. In order to verify your identity, your request must include the following:
  - a. Your full name and email address associated with your profile;
  - b. Your preferred contact phone number; and
  - c. The number of employment opportunities you have applied for with PQ Corporation, as well as the Job Title and Job Code associated with each application, to the extent available.
  
3. If you have provided PQ Corporation with your information via our website and reside in the State of California, Canada or the European Union, you may submit your request via email at [webenhance@pqcorp.com](mailto:webenhance@pqcorp.com).
  - a. Your full name and email address, as provided by you to PQ Corporation via our website;
  - b. Your preferred contact phone number; and
  - c. A brief description of why you believe PQ has your personal information (i.e. you have submitted a “contact us” form through our website). Please note that any information you provide to PQ under this section will be used solely for verification purposes and deleted once verification is established.

**Authorized Agents:** You may exercise your right to know or your request for deletion of your personal information, through the use of an authorized agent. A request from an authorized agent on your behalf will only be accepted if the authorized agent provides us with written proof they are authorized to act on your behalf. We may also first require the authorized agent to verify their identity, before accepting the request. PQ Corporation may deny requests from authorized agents that fail to provide proof of their status as an authorized agent or verification of their identity.

### **Disclosure of your Personal Information when Required by Law**

PQ Corporation may also disclose your personal data as required by law, with or without notice, when PQ Corporation believes that disclosure is necessary to:

- Comply with the law, including a regulatory requirement, legal process served on PQ Corporation or the PQ Corporation Website, government request, or other court order.
- Protect and defend the rights or property of PQ Corporation and its users.
- Protect the personal safety of users of PQ Corporation, or the public.

PQ Corporation may also disclose aggregate information about users of the Website that is not personally identifiable to third parties without restriction.

## **Data Integrity**

As to its website visitors, its own employees or its own job applicants, PQ Corporation will take reasonable steps to provide that your PI is accurate, complete, and current, to its intended use. We provide individuals with reasonable access to the PI that they provide to us, as well as the ability to review and correct such information. For access requests please contact us in accordance with the procedure above under “Your Rights Regarding Your Information.”

As to its own employees and its own job applicants, PQ Corporation will take reasonable steps to provide that personal information is accurate, complete, and current, to its intended use. PQ Corporation will only use personal information in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual.

## **How We Store and Protect Your Information**

To prevent unauthorized access or disclosure, to maintain data accuracy, and to allow only the appropriate use of your personal information, we utilize physical, technical, and administrative controls and procedures to safeguard the information we collect.

To protect the confidentiality, integrity, and availability of your personal information, PQ Corporation utilizes a variety of physical and logical access controls, firewalls, intrusion detection/prevention systems, network and database monitoring, anti-virus, and backup systems. We use encrypted sessions when collecting or transferring sensitive data through our websites.

We limit access to your personal information and data to those persons who have a specific business purpose for maintaining and processing such information. PQ Corporation’s employees who have been granted physical access to your personal information are made aware of their responsibilities to protect the confidentiality, integrity, and availability of that information and have been provided training and instruction on how to do so.

PQ Corporation will retain your personal data so long as your account is active or it is reasonably needed for the purposes described in this policy or to comply with our legal obligations, resolve disputes, and as applicable to agreements with our customers.

## **Privacy Policies of Other Websites**

PQ Corporation’s websites may contain links to third-party sites for your convenience and/or information. If you access those links, you will leave PQ Corporation’s website and be re-directed to a third-party site. PQ Corporation does not control those sites or the privacy practices of those third-party sites, which may differ from PQ Corporation’s privacy practices. We do not endorse or make any representations about third-party websites, and the personal data you choose to provide to third-party websites is not covered by this Privacy Notice. We encourage you to review the privacy policy of any website or company before submitting your personal information to them.

## **International Information Transfers**

PQ Corporation is a global organization with its corporate headquarters in the United States. Our servers, databases, and service providers are located in the United States, the EU, Canada and other jurisdictions around the world. Different countries have different privacy laws and requirements, and some, including the United States, may provide less legal protection for your personal information than others. If you object to the transfer of your information to the United States or other jurisdictions, please do not use PQ Corporation's website or provide PQ Corporation with that information.

## **Children Under the Age of 16**

PQ Corporation's website is not intended for children under 16 years of age, and PQ Corporation does not knowingly collect information from children to sell or promote our products or services. No one under the age of 16 may provide information to PQ Corporation on or through our website, and if we learn that we have received information from a child under the age of 16, we will delete that information. If you believe a child under the age of 16 has sent personal contact information to PQ Corporation, please contact us immediately and we will use reasonable efforts to promptly remove that information from our systems.

This section does not apply to jurisdictions where PQ Corporation may have a presence, which permit children under the age of 16 to work for or apprentice with PQ Corporation, subject to applicable parental consent requirements. In such cases, PQ Corporation will comply with the laws of the applicable jurisdiction.

## **Changes to this Policy**

PQ Corporation will occasionally update this Policy to reflect company and customer feedback. Any changes will be posted on this page and effective upon updating this Website. ***This Privacy Policy was last updated on September 28, 2020.***

By continuing to use the Website and services provided by PQ Corporation, you indicate you consent to the data collection, use, and disclosure practices described in the updated Policy. You are responsible for periodically reviewing this Policy to be informed of how PQ Corporation is treating your personal information.

## **Dispute Resolution**

PQ Corporation will investigate and attempt to resolve complaints and disputes regarding the use and disclosure of personal information in accordance with the principles contained in this Notice. PQ Corporation agrees to cooperate with Data Protection Authorities located in the European Union. We strongly encourage you to raise any complaints you may have with regard to this Privacy Notice and/or our activation of this Notice to us prior to proceeding to the dispute resolution procedure described in this paragraph.

If you think your data protection rights have been breached and you are located in the European Union, you may file a complaint with your national Data Protection Authority, found here: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en).

If you think your data protection rights have been breached and you are located in Canada, you may file a complaint related to Canadian Human Rights, found here: <https://www.chrc.gc.ca>.

### **Contact Information**

If you have any questions, comments, or requests regarding this Policy, please contact us by emailing [webenhance@pgcorp.com](mailto:webenhance@pgcorp.com), or write to the following address:

PQ Corporation  
Data Protection Compliance Team  
300 Lindenwood Drive  
Malvern, PA 19355