

## HANWHA AZDEL PRIVACY POLICY

This privacy policy explains how Hanwha Azdel, Inc. (the “COMPANY”) uses the personal data we collect from you when you access our website or provide information to the COMPANY by other portals. Such data may be collected by Hanwha Azdel, Inc. through various websites including, but not limited to, <http://www.hanwhaazdel.com>, <http://www.azdel.com>, <http://www.azdelonboard.com>, and other websites and portals provided by the COMPANY.

This Privacy Policy is effective as of January 1, 2023 and is subject to change and modification as noted below.

Should you have a separate confidentiality agreement or non-disclosure agreement with the COMPANY that is still effective, then the terms in that confidentiality agreement or non-disclosure agreement shall control over any terms in this Privacy Policy. Subsequent to expiration of any terms of a confidentiality agreement or non-disclosure agreement between you and the COMPANY, the terms in this Privacy Policy shall control if applicable.

This Privacy Policy is applicable to all means of entry when you access any website or information of the COMPANY or use any product sold or provided by the COMPANY.

### Topics:

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3. How will we use your data?
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## **1. What do we collect?**

The COMPANY collects the following data:

**Information you give us:** The COMPANY collects any information that you enter on our website or other COMPANY portals. This information is normally provided when you search, buy, participate in a contest, sweepstakes or on-line survey, or when you communicate with any of our departments such as customer service, sales or technical services through our website, telephone, mail or fax. You also provide information if you establish an account with us. Examples of the type of information you may supply us with include your name, address, telephone number, and e-mail addresses.

**Automatic Information from website collected by us:** Whenever you visit our website we collect and store information such as “cookies” which remember information about a visitor from one page to the next and from one visit to the next. We collect and analyze the IP address used to connect your computer to the Internet; login; password; computer and connection information such as your browser type and version; operating system and platform; purchase history; confirmation when you open e-mail that we send you; the URLs which lead you to and around our website and other sites on the World Wide Web, including the date and time; the pages and or products you viewed or searched for and the phone number used to call our voice telephone numbers. Your browser allows you to reject cookies, and software is available from third parties that can allow you to visit our website without providing this information. You are welcome to access our website if you use this software, but we may not be able to offer you our personalized services.

**Orders:** If you place an order we use a secure order form, which requires you to provide contact, billing, and financial information. This information may be transmitted to various third party entities to authorize your purchase. All orders placed on the website or through other portals provided by the COMPANY are governed by COMPANY’s Standard Terms and Conditions which can be found on the website.

## **2. How do we collect your data?**

You directly provide the COMPANY with most of the data we collect. We collect data and process data when you:

- a. Register online or place an order for any of our products or services.
- b. Voluntarily complete a customer survey or provide feedback on any of our message boards or via email.
- c. Use or view our website via your browser's cookies.

The COMPANY does not receive your data indirectly from any third party source.

### **3. How will we use your data?**

The COMPANY collects your data so that we may:

- a. Process your order;
- b. Manage your account; and/or
- c. Email you with special offers on other products and services we think you might like.

If you agree, the COMPANY may share your data with our partner companies so that they may offer you their products and services.

The COMPANY may share information, including personal data, with our third party service providers that we engage for providing hosting, for maintenance of our websites, applications, backup, storage, payment processing, analytics, and other services. We do not allow our service providers with whom we share personal data to use that information for marketing or any other purpose other than in connection with the services they provide to the COMPANY. See Exhibit A below for more information.

When the COMPANY processes your order, it may send your data to, and also use the resulting information from, credit reference agencies to prevent fraudulent purchases.

Independent Contractors: The COMPANY employs other companies or individuals to provide certain services to us such as sending e-mail, providing click to call telephone-calling services, analyzing customer lists and data, providing marketing assistance, or consulting services. These third parties will have access to the information needed to perform their functions but cannot use that information for any direct marketing purpose.

Aggregate information: The COMPANY may provide aggregate information to some of our business partners. This information does not allow them to identify you individually.

Vendors: The COMPANY may provide some of our vendors with your contact information so that they may contact you directly with product support information. For example, we may supply your contact information to a Vendor if they request it in order to provide you with product support or recall information about a product you have purchased from us.

Banking Information, credit card companies, other Payors and shippers: When you buy something from us we may send your banking information, credit card information, name, billing address and the amount of your purchase to third parties to verify and authorize the purchase. We will also send the same information (name, billing address and amount of your purchase) for other payment types which we may offer. Your name, telephone number and shipping information must be provided to third party shippers such as UPS, Freight companies, Federal Express and the United States Postal Service to deliver your purchase.

Third Party Checkout Links: If you use a third party checkout link on our site, your name, billing and shipping addresses and other information requested by that payment service may be transferred to us from your account with the third party to enable you to check out of our site without having to re-enter certain information. You should review the third party's privacy policy, which is separate from the Privacy Policy described here.

#### **4. How do we store your data?**

The COMPANY does not currently store any website data.

#### **5. Marketing**

The COMPANY does not currently use any of your information for marketing purposes.

#### **6. What are your data protection rights?**

The COMPANY would like to make sure you are fully aware of all of your data protection rights.

Every user is entitled to the following:

- a. The right to access - You have the right to request from the COMPANY copies of your personal data. We may charge you a small fee for this service.
- b. The right to rectification - You have the right to request that the COMPANY correct any information that you believe is inaccurate. You also have the right to request the COMPANY to complete information that you believe is incomplete.
- c. The right to erasure — You have the right to request that the COMPANY erase or delete your personal data, under certain conditions.
- d. The right to restrict processing - You have the right to request that the COMPANY restrict the processing of your personal data, under certain conditions.
- e. The right to object to processing - You have the right to object to the COMPANY's processing of your personal data, under certain conditions,

- f. The right to data portability - You have the right to request that the COMPANY transfer the data that we have collected to another organization, or directly to you, under certain conditions.
- g. The right to be notified of any data breach – You have the right to be notified within 72 hours of any data breach that may affect your information.

Except for the time period noted in Section 6g above, if you make a request under this section 6, we have no less than one month to respond to you.

If you would like to exercise any of these rights, please contact us at our email:

[webmaster@azdel.com](mailto:webmaster@azdel.com)

Call us at: (800) 635-7021

Or write to us:            HANWHA AZDEL, INC.  
                                    Legal Department (Privacy Policy)  
                                    2000 Enterprise Drive  
                                    Forest, VA 24551 US

## **7. What are cookies?**

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit our websites, we may collect information from you automatically through cookies or similar technology

For further information, visit [allaboutcookies.com](http://allaboutcookies.com)

## **8. How do we use cookies?**

The COMPANY uses cookies in a range of ways to improve your experience on our website, including:

- a. Keeping you signed in
- b. Understanding how you use our website

## **9. What types of cookies do we use?**

There are a number of different types of cookies, however, our website uses:

- a. Functionality - The COMPANY uses these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.

b. Advertising and related company sharing — The COMPANY uses these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device, and your IP address. The COMPANY does not currently share any information with third parties for advertising purposes. We may share online data collected through cookies with our affiliates or related companies.

## **10. How to manage your cookies**

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser, However, in a few cases, some of our website features may not function as a result.

## **11. Privacy policies of other websites**

The COMPANY website may contain links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, then you should read their privacy policy.

## **12. Changes to our privacy policy**

The COMPANY keeps its privacy policy under regular review and places any updates on this web Page. This Privacy Policy was last updated on July 14, 2023. The COMPANY retains all right and ability to update this Privacy Policy as needed without prior notice.

## **13. How to contact us**

If you have any questions about the COMPANY's privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

[webmaster@azdel.com](mailto:webmaster@azdel.com)

Call us at: (800) 635-7021

Or write to us: HANWHA AZDEL, INC.  
Legal Department (Privacy Policy)  
2000 Enterprise Drive  
Forest, VA 24551 US

## **14. How to contact the appropriate authority**

Should you wish to report a complaint or if you feel that the COMPANY has not addressed your

concern in a satisfactory manner, you may contact the Information Commissioner's Office (in the European Union), the Federal Trade Commission (in the United States), your state Attorney General's office or other designated state or country authority.

## **15. Law Enforcement and Protection of Users**

We will release personally identifiable information to third parties and organizations when we believe it is appropriate for us to do so to comply with the law. We will also do so to cooperate with law enforcement investigations, comply with court orders or subpoenas, protect the legal rights of our users, and us or when we believe it is needed for fraud protection and/ or credit risk reduction.

## **16. Business Transfer**

The COMPANY has been in business for years and our intent is to continue in this manner. However, in the unlikely event that the COMPANY is sold, has substantially all of its assets acquired or merges or becomes affiliated with any other individual or entity, then any customer information owned or under the control of the COMPANY may be one of the transferred assets.

## **17. No Guarantee of Continued Availability**

The COMPANY provides access to certain URL and web pages. The COMPANY does not guarantee that any of its URL's or web pages will be available during any particular time, for any period or on a continuing basis. The COMPANY reserves the right to remove or limit access to anything on its website.

## **18. Children's Online Policy**

The COMPANY is committed to the preservation of online privacy for all of its website visitors, including children. Consistent with the Children's Online Privacy Protection Act, we will not knowingly collect any personally identifiable information from children under the age of 13. The COMPANY sells products intended for purchase by adults. If you are a child under the age of 13, you must ask your parent or guardian to assist you in using the COMPANY's website.

## **19. Governing Law**

This privacy policy is governed by the laws of the Commonwealth of Virginia.

## **20. Security**

Our website protects the security of personal information you transmit to us by using Secure Sockets Layer (SSL) software, which encrypts the information you input during the transmission

to us. If applicable, in order to protect against unauthorized access to your account you should sign off when you finish visiting our site.

## **21. Grant of Non-Exclusive License to IP Rights**

By posting messages, uploading files, inputting data or engaging in any other form of communication with the COMPANY, you hereby grant to the COMPANY a non-exclusive, royalty free, fully paid up, worldwide, irrevocable, unrestricted license, to use, copy, license, sublicense, adapt, distribute, display, publicly perform, reproduce, transmit, modify, edit and otherwise exploit any information that you provide to the COMPANY.

## **22. European Economic Area Provisions**

If you are located in the European Economic Area (EEA), the COMPANY's legal basis for processing the personal data we receive depends on the context in which it is provided to us. In our normal course of business, we will only process personal data that has been sent to us by you or our Customer through: our website and information by other portals provided by the COMPANY. We will process the personal data sent to us where you have provided your consent (based on Art. 6 of the General Data Protection Regulations (GDPR)) to your data controller or where the processing of the information is necessary for the purposes of the legitimate interests pursued by the controller or by a third party and not overridden by your data protection interests or fundamental rights and freedoms (based on Art. 6 of the GDPR). We may also process your personal data where we have a legal obligation to collect and process personal data and are the controller in respect of such data (based on Art. 6 of the GDPR), or where the processing is necessary to protect your vital interests or that of another natural person (based on Art. 6 of the GDPR).

In circumstances where we rely on your consent to process the personal data, you have the right to withdraw your consent at any time. However, this may not affect the lawfulness of the processing based on the consent the COMPANY has received prior to the withdrawal of consent.

If you provide the COMPANY your personal data to comply with a legal requirement (e.g. Hours of Service) or to perform a contract (e.g. End User Agreement), we will make this clear to you at the relevant time. The COMPANY recommends that users take steps to minimize the personal data they ask the COMPANY to process.

To the extent the COMPANY is a controller of your personal data and you reside in the EEA, please note the following provisions:

We may transmit some of your personal data to an international organization or a country where the data protection laws may not provide a level of protection equivalent to the laws in your jurisdiction. As required by applicable law, we will provide an adequate level of protection for your personal data using various means, including, where appropriate:



- relying on a formal decision by the European Commission that a certain country ensures an adequate level of protection for personal data (a full list of such decisions may be accessed online here);
- entering into appropriate data transfer agreements based on language approved by the European Commission, such as the Standard Contractual Clauses (2010/87/EC and/or 2004/915/EC);
- implementing appropriate physical, technical and organizational security measures to protect Personal Data against accidental or unlawful destruction, accidental loss or alteration, unauthorized disclosure or access, and against all other unlawful forms of processing; and
- taking other measures to provide an adequate level of data protection in accordance with applicable law.

Any onward transfer is subject to appropriate onward transfer requirements as required by applicable law.

If you reside in the EEA or certain other jurisdictions, you have the right to exercise additional rights available to you under the local law that applies to you:

- Right of erasure: you may have a broader right to have personal data that we hold about you erased or deleted.
- Right to object to processing: you may have the right to request that the COMPANY stop processing your personal data.
- Right to restrict processing: you may have the right to request that the COMPANY limit the processing of your personal data in some circumstances (e.g. where you believe that the personal data we hold about you is inaccurate or was obtained unlawfully).
- Right to data portability: in some limited circumstances, you may have the right to receive a copy of your data in machine readable, commonly used format and to request that we transfer personal data to another controller.

Please contact us at [webmaster@azdel.com](mailto:webmaster@azdel.com) or write to us under the address listed in Section 13 to exercise any of these rights.

### **23. California Consumer Privacy Acts Disclosures**

If you are a resident of California, please review the Supplemental California Consumer Privacy Act Disclosures listed in Exhibit B.

### **24. Virginia Consumer Data Protection Act Disclosures**

If you are a resident of Virginia, please review the Supplemental Virginia Consumer Data Protection Act Disclosures listed in Exhibit C.

### **25. Indiana Consumer Data Protection Act Disclosures**

If you are a resident of Indiana, please review the Supplemental Indiana Consumer Data Protection Act Disclosures listed in Exhibit D.

### **26. Reservation to Include Additional State and Country Disclosures**

The COMPANY reserves the right to include additional supplemental disclosures specific to states and countries as those states or countries adopt their respective privacy policies.



## **EXHIBIT A – Sub-Processors**

Sub-Processors used by the COMPANY include:

1. The COMPANY does not currently use any Sub-Processors (as defined in the GDPR) or third parties in processing any personal information collected from the website.

## **Exhibit B – Supplemental California Consumer Privacy Act Disclosures**

The following California Consumer Privacy Act Disclosures ("CCPA Disclosures") supplement the COMPANY Privacy Policy in order to disclose information about our data processing practices as required by the California Consumer Privacy Act of 2018 ("CCPA"). These CCPA Disclosures are effective January 1, 2023.

### **I. Who We Are and Scope of this Privacy Policy**

California residents are protected as "consumers" by the California Consumer Privacy Act of 2018, as amended by way of Proposition 24, the CPRA, effective in 2023, with respect to personal information.

Certain categories of personal data are statutorily excluded from the CCPA and these CCPA Disclosures, including the following:

- (1) personal information reflecting a written or verbal communication or a transaction between a business and a consumer, where the consumer is a natural person who is acting as an employee, owner, director, officer, or contractor of a company, partnership, sole proprietorship, non-profit, or government agency and whose communications or transaction with the business occur solely within the context of the business conducting due diligence regarding, or providing or receiving a product or service to or from such company, partnership, sole proprietorship, non-profit, or government agency;
- (2) personal information that is collected by a business about a natural person in the course of the natural person acting as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or contractor of that business to the extent that the natural person's personal information is collected and used by the business solely within the context of the natural person's role or former role as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or a contractor of that business;
- (3) personal information that is collected by a business that is emergency contact information of the natural person acting as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or contractor of that business to the extent that the personal information is collected and used solely within the context of having an emergency contact on file; and
- (4) personal information that is necessary for the business to retain to administer benefits for another natural person relating to the natural person acting as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or contractor of

that business to the extent that the personal information is collected and used solely within the context of administering those benefits.

## **II. How can a consumer with a disability access these CCPA Disclosures?**

Consumers who have a visual disability may be able to use a screen reader or other text-to-speech or text-to-Braille tool to review the contents of this notice. You may also contact [webmaster@azdel.com](mailto:webmaster@azdel.com) if you wish to obtain a copy of these CCPA Disclosures in an alternative format.

## **III. CCPA Notice at Collection Online**

The COMPANY addresses "at collection" disclosure requirements in our Privacy Notice (see Section I., "Who and what information is subject to these CCPA Disclosures").

## **IV. CCPA Privacy Policy**

Beyond the disclosures in the preceding "CCPA Notice At Collection Online" section, the COMPANY is providing additional disclosures about consumer rights and our personal information handling practices in the preceding twelve (12) months, as required by the CCPA.

### **1. Right to Know About Personal Information Collected, Used, or Disclosed**

This CCPA Privacy Policy describes the personal information we may collect, use, and disclose about California residents. You have the right to request that we disclose what personal information we collect, use, and disclose about you specifically ("right to know"). To submit a request to exercise the right to know or for information on self-service procedures (where available), please visit us at [www.COMPANYsafedriver.com](http://www.COMPANYsafedriver.com), call our phone number at 540-685-2282 or submit an email request to [webmaster@azdel.com](mailto:webmaster@azdel.com) and include "California Request to Know" in the subject line. Please specify in your request the details you would like to know, including any specific pieces of personal information you would like to access.

We may ask that you provide certain information to verify your identity. If you have a password-protected account with us, we may verify your identity through our existing authentication practices for your account. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue. We will respond to your request in accordance with the CCPA. If we deny requests, we will explain why.

## **2. Our Personal Information Handling Practices in the Past 12 Months**

The COMPANY has not collected personal information about California residents in the preceding twelve (12) months.

## **3. Disclosures of Personal Information; No Sale**

Over the preceding twelve (12) months, the COMPANY has not collected or disclosed California residents' personal information to any third parties. We do not sell and will not sell California residents' personal information. This includes the personal information of minors under sixteen (16) years of age.

## **4. Right to Request Deletion or Correction of Personal Information**

In the event we collect information of any California resident, you have a right to request the deletion of personal information that we collect or maintain about you. To submit a request to delete personal information or for information on our self-service data deletion procedures (where available), please visit our COMPANY Support portal or submit an email request to [webmaster@azdel.com](mailto:webmaster@azdel.com) (or in writing to the address listed in Section 13 of this Privacy Policy) and include "California Request to Delete" or "California Request to Correct" in the subject line. Please specify in your request the personal information about you that you would like to have deleted, which can be all of your personal information as required by the CCPA. This request may also be made in writing to the address listed at the end of this Supplemental Disclosure.

You also have a right to request that we correct inaccurate personal information that the COMPANY may have about you.

The COMPANY must respond within 45 days of the receipt of the request submitted by the consumer. The COMPANY can request an extension of an additional 45 days to respond.

The COMPANY will either grant the consumer's request or decline it by providing the justification for declining it. The COMPANY can also request that additional information be provided by the consumer in order to both authenticate the consumer and the consumer's request.

We may ask that you provide certain information to verify your identity. If you have a password-protected account with us, we may verify your identity through our existing authentication practices for your account. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue. Once we have verified your identity, we will ask you to confirm that you wish to have your personal information deleted or corrected. Once confirmed, we will respond to your request in accordance with the CCPA. If we deny your request, we will explain why.

## **5. Right to Opt-Out of the Sale of Personal Information**

You have the right to opt-out of the sale of your personal information by a business. We have not and do not sell your personal information.

## **6. Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights**

You may not be discriminated against because you exercise any of your rights under the CCPA in violation of Cal. Civ. Code §1798.125.

## **7. Authorized Agent**

You can designate an authorized agent to make a request under the CCPA on your behalf if:

- The authorized agent is a natural person or a business entity registered with the Secretary of State of California; and
- You sign a written declaration that you authorize the authorized agent to act on your behalf.

If you use an authorized agent to submit a request to exercise your right to know or your right to request deletion, please have the authorized agent take the following steps in addition to the steps described above:

- Mail your written declaration authorizing the authorized agent to act on your behalf, certified by a California notary public, to Attn: HANWHA AZDEL, INC. Legal Department (Privacy Team), 2000 Enterprise Dr., Forest, VA 24551 US with an e-mail cc: to [webmaster@azdel.com](mailto:webmaster@azdel.com); and
- Provide any information we request in our response to your email to verify your identity. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue.

If you provide an authorized agent with power of attorney pursuant to Probate Code sections 4000 to 4465, it may not be necessary to perform these steps and we will respond to any request from such authorized agent in accordance with the CCPA.

## **8. Contact for More Information**

If you have questions or concerns regarding these CCPA Disclosures, our Privacy Policy or practices, you may contact us using the following details: Email address: [webmaster@azdel.com](mailto:webmaster@azdel.com); Postal address: HANWHA AZDEL, INC (Attn: Privacy Policy), 2000 Enterprise Dr., Forest, VA 24551 US.

## **Exhibit C – Supplemental Virginia Consumer Data Protection Act Disclosures**

### **1. The Virginia Consumer Data Protection Act**

The Virginia Consumer Data Protection Act (“VCDPA”) went into effect on January 1, 2023. This new law provides Virginia residents certain rights for personal data collected by businesses under conditions outlined in the VCDPA.

### **2. What is personal data under the VCDPA?**

“Personal data” means any information that is linked or reasonably linkable to a Virginia resident. “Personal data” does not include publicly available information such as public records held by the government or de-identified data.

### **3. What data is exempt from the VCDPA?**

The following types of data are not covered by the VCDPA: protected health information under the Health Insurance Portability and Accountability Act (“HIPAA”), health records, patient identifying information, and other sets of data identified in Va. Code §59.1-576 that relate to compliance with various federal laws.

### **4. What rights do Virginia consumers have with their personal data?**

The VCDPA allows for consumers to request that the COMPANY:

- a. Confirm if the COMPANY is actually processing their personal data.
- b. Correct inaccuracies in the consumer’s personal data that is collected by the COMPANY.
- c. Delete personal data provided by or obtained about the consumer.
- d. Obtain copies of the personal data collected by the COMPANY.
- e. Opt out of the processing of personal data for purposes of targeted advertising, the sale of personal data, or further profiling.

### **5. What should Virginia residents do to ensure that the COMPANY honors their rights regarding their personal data?**

Virginia consumers can invoke their rights by submitting a request to the COMPANY of their personal data specifying the rights they want to invoke. Any such request can be submitted at:

HANWHA AZDEL, INC. Legal Department (Privacy Team), 2000 Enterprise Dr., Forest, VA 24551 US with an e-mail cc: to [webmaster@azdel.com](mailto:webmaster@azdel.com).



Information provided in response to a consumer request shall be provided by the COMPANY free of charge, up to twice annually per consumer.

The COMPANY must respond within 45 days of the receipt of the request submitted by the consumer. The COMPANY can request an extension of an additional 45 days to respond.

The COMPANY will either grant the consumer's request or decline it by providing the justification for declining it. The COMPANY can also request that additional information be provided by the consumer in order to authenticate the consumer and the consumer's request.

If the request invoking the consumer's rights is declined, the COMPANY must provide clear instructions for appealing the decision. Within 60 days of receipt of an appeal, the COMPANY must provide in writing an explanation of the reasons for its decision.

If the appeal is denied by the COMPANY, then the consumer may contact the Virginia Attorney General to submit a complaint at:

Attorney General of Virginia Office  
202 N 9th St.  
Richmond, VA 23219

or

<https://www.oag.state.va.us/consumer-protection/index.php/file-a-complaint>.

The Virginia Attorney General has exclusive authority to enforce the VCDPA.

## **6. What can Virginia consumers do to protect their sensitive data?**

Sensitive data is also considered as personal data under the VCDPA, but it is subject to additional requirements. For example, the COMPANY cannot process sensitive data concerning a consumer without obtaining the consumer's prior consent.

The VCDPA considers the following to be sensitive data:

- a. A person's racial or ethnic origin, religious beliefs, mental or physical health diagnosis, sexual orientation or citizenship or immigration status.
- b. The processing of genetic or biometric data for the purposes of uniquely identifying that person.
- c. The personal data collected from a known child, which is defined as someone younger than 13.
- d. Precise geolocation data.

The COMPANY does not collect any Sensitive data as defined in the VCDPA.

## **7. COMPANY's Responsibilities**

The COMPANY:

- a. Limits the collection of personal data to what is adequate, relevant, and reasonably necessary in relation to the purposes for which such data is processed, as disclosed to the consumer;
- b. Does not process personal data for purposes that are neither reasonably necessary nor compatible with the disclosed purposes for which such personal data is processed, as disclosed to the consumer, unless the COMPANY obtains the consumer's consent;
- c. Establishes implements, and maintains reasonable administrative, technical, and physical data security practices to protect the confidentiality, integrity, and accessibility of personal data. Such data security practices shall be appropriate to the volume and nature of the personal data at issue;
- d. Does not process personal data in violation of state and federal laws that prohibit unlawful discrimination against consumers. The COMPANY does not discriminate against a consumer for exercising any of the consumer rights contained in this chapter, including denying goods or services, charging different prices or rates for goods or services, or providing a different level of quality of goods and services to the consumer. Nothing, however, requires the COMPANY to provide a product or service that requires the personal data of a consumer that the COMPANY does not collect or maintain or to prohibit the COMPANY from offering a different price, rate, level, quality, or selection of goods or services to a consumer, including offering goods or services for no fee, if the consumer has exercised his right to opt out pursuant to Va. Code. § 59.1-577 or the offer is related to a consumer's voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program; and
- e. Does not process sensitive data concerning a consumer without obtaining the consumer's consent, or, in the case of the processing of sensitive data concerning a known child, without processing such data in accordance with the federal Children's Online Privacy Protection Act (15 U.S.C. § 6501 et seq.).

## **8. Sale of Personal Data to Third Parties**

The COMPANY does not sell Personal Data of any consumer to any third party.

## **9. De-Identified Data**

De-Identified Data means data that cannot reasonably be linked to an identified or identifiable natural person, or a device linked to such person.

If the COMPANY is in possession of de-identified data, then the COMPANY shall:

- a. Take reasonable measures to ensure that the data cannot be associated with a natural person;

- b. Publicly commit to maintaining and using de-identified data without attempting to re-identify the data; and
- c. Contractually obligate any recipients of the de-identified data to comply with all provisions of the VCDPA.

## 10. Limitations

Nothing in this Privacy Policy shall be construed to restrict the COMPANY's ability to:

- a. Comply with federal, state, or local laws, rules, or regulations;
- b. Comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, local, or other governmental authorities;
- c.. Cooperate with law-enforcement agencies concerning conduct or activity that the COMPANY reasonably and in good faith believes may violate federal, state, or local laws, rules, or regulations;
- e. Investigate, establish, exercise, prepare for, or defend legal claims;
- f. Provide a product or service specifically requested by a consumer, perform a contract to which the consumer is a party, including fulfilling the terms of a written warranty, or take steps at the request of the consumer prior to entering into a contract;
- g. Take immediate steps to protect an interest that is essential for the life or physical safety of the consumer or of another natural person, and where the processing cannot be manifestly based on another legal basis;
- h.. Prevent, detect, protect against, or respond to security incidents, identity theft, fraud, harassment, malicious or deceptive activities, or any illegal activity; preserve the integrity or security of systems; or investigate, report, or prosecute those responsible for any such action;
- i. Engage in public or peer-reviewed scientific or statistical research in the public interest that adheres to all other applicable ethics and privacy laws and is approved, monitored, and governed by an institutional review board, or similar independent oversight entities that determine: (i) if the deletion of the information is likely to provide substantial benefits that do not exclusively accrue to the controller; (ii) the expected benefits of the research outweigh the privacy risks; and (iii) if the COMPANY has implemented reasonable safeguards to mitigate privacy risks associated with research, including any risks associated with reidentification;
- j. Assist another company, controller, processor, or third party with any of the obligations under the VCDPA; or
- k. Alter this Privacy Policy to comply with any changes in the VCDPA.

## 11. Reservation to Update

The COMPANY hereby reserves all right to update this Supplemental disclosure based on changes in the Virginia Code any applicable Virginia case law.

## **Exhibit D – Supplemental Indiana Consumer Data Protection Act Disclosures**

### **1. The Indiana Consumer Data Protection Act**

The Indiana Consumer Data Protection Act (ICDPA) is scheduled to take effect January 1, 2026. This new law provides Indiana residents certain rights for personal data collected by businesses under conditions outlined in the ICDPA.

### **2. What is personal data under the ICDPA?**

“Personal data” means information that is linked or reasonably linkable to an identified or identifiable individual.

### **3. What data is exempt from the ICDPA?**

The following types of data are not covered by the ICDPA: protected health information under the Health Insurance Portability and Accountability Act (“HIPAA”), health records, patient identifying information, and other sets of data identified in the ICDPA that relate to compliance with various federal laws or regulations.

### **4. What rights do Indiana consumers have with their personal data?**

A consumer has the following rights:

- (1) To confirm whether or not the COMPANY is processing the consumer's personal data and, subject to the limitations set forth in subdivision (4), to access such personal data.
- (2) To correct inaccuracies in the consumer's personal data that the consumer previously provided to the COMPANY, taking into account the nature of the personal data and the purposes of the processing of the consumer's personal data. Upon receiving a request from a consumer under this subdivision, the COMPANY shall correct inaccurate information as requested by the consumer, taking into account the nature of the personal data and the purposes of the processing of the consumer's personal data.
- (3) To delete personal data provided by or obtained about the consumer.
- (4) To obtain either:
  - (A) a copy of; or
  - (B) a representative summary of;the consumer's personal data that the consumer previously provided to the controller. Information provided to a consumer under this subdivision must be in a portable and, to the extent technically practicable, readily usable format that allows the consumer to transmit the data or summary to

another company without hindrance, in any case in which the processing is carried out by automated means. The controller has the discretion to send either a copy or a representative summary of the consumer's personal data under this subdivision, taking into account the nature of the personal data and the purposes of the processing of the consumer's personal data. The COMPANY is not required to provide a copy or a representative summary of a consumer's personal data to the same consumer under this subdivision more than one (1) time in a twelve (12) month period.

- (5) To opt out of the processing of the consumer's personal data for purposes of:
- (A) targeted advertising;
  - (B) the sale of personal data; or
  - (C) profiling in furtherance of decisions that produce legal or similarly significant effects concerning the consumer

## **5. What should Indiana residents do to ensure that the COMPANY honors their rights regarding their personal data?**

Indiana consumers can invoke their rights by submitting a request to the COMPANY of their personal data specifying the rights they want to invoke. Any such request can be submitted at:

HANWHA AZDEL, INC. Legal Department (Privacy Team), 2000 Enterprise Dr., Forest, VA 24551 US with an e-mail cc: to [webmaster@azdel.com](mailto:webmaster@azdel.com); and

Information provided in response to a consumer request shall be provided by the COMPANY free of charge, up to once annually per consumer.

The COMPANY must respond within 45 days of the receipt of the request submitted by the consumer. The COMPANY can request an extension of an additional 45 days to respond.

If the COMPANY declines to take action regarding the consumer's request, the COMPANY shall inform the consumer without undue delay, but in any case not later than forty-five (45) days after receipt of the consumer's request, of the justification for declining to take action, and shall provide instructions for how to appeal the decision.

If the appeal is denied by the COMPANY, then the consumer may contact the Indiana Attorney General to submit a complaint. The Indiana Attorney General has exclusive authority to enforce the ICDPA.

You may contact the Indiana Attorney General's office at:

Office of the Indiana Attorney General  
Indiana Government Center South  
302 W. Washington St., 5th Floor  
Indianapolis, IN 46204  
Phone: (317) 232-6201  
Fax: (317) 232-7979

or

<https://inoag.my.salesforce-sites.com/ConsumerComplaintForm>

The Indiana Attorney General has exclusive authority to enforce the ICDPA.

## **6. What can Indiana consumers do to protect their sensitive data?**

Sensitive data is also considered as personal data under the ICDPA, but it is subject to additional requirements. For example, the COMPANY cannot process sensitive data concerning a consumer without obtaining the consumer's prior consent.

The ICDPA considers the following to be sensitive data:

- a. Personal data revealing racial or ethnic origin, religious beliefs, a mental or physical health diagnosis made by a health care provider, sexual orientation or citizenship or immigration status.
- b. Genetic or biometric data that is processed for the purpose of uniquely identifying a specific individual.
- c. Personal data collected from a known child.
- d. Precise geolocation data.

The COMPANY does not collect any Sensitive data as defined in the ICDPA.

## **7. COMPANY's Responsibilities**

The COMPANY:

- a. Limits the collection of personal data to what is adequate, relevant, and reasonably necessary in relation to the purposes for which such data is processed, as disclosed to the consumer;
- b. Does not process personal data for purposes that are neither reasonably necessary to nor compatible with the disclosed purposes for which such personal data is processed, as disclosed to the consumer, unless the COMPANY obtains the consumer's consent;
- c. Establishes implements, and maintains reasonable administrative, technical, and physical data security practices to protect the confidentiality, integrity, and accessibility of

personal data. Such data security practices shall be appropriate to the volume and nature of the personal data at issue;

d. Does not process personal data in violation of state and federal laws that prohibit unlawful discrimination against consumers. The COMPANY does not discriminate against a consumer for exercising any of the consumer rights contained in this chapter, including denying goods or services, charging different prices or rates for goods or services, or providing a different level of quality of goods and services to the consumer. Nothing, however, requires the COMPANY to provide a product or service that requires the personal data of a consumer that the COMPANY does not collect or maintain or to prohibit the COMPANY from offering a different price, rate, level, quality, or selection of goods or services to a consumer, including offering goods or services for no fee, if the consumer has exercised his right to opt out pursuant to IC 24-15-3-1(b)(5) or the offer is related to a consumer's voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program; and

e. Does not process sensitive data concerning a consumer without obtaining the consumer's consent, or, in the case of the processing of sensitive data concerning a known child, without processing such data in accordance with the federal Children's Online Privacy Protection Act (15 U.S.C. § 6501 et seq.).

## **8. Sale of Personal Data to Third Parties**

The COMPANY does not sell Personal Data of any consumer to any third party.

## **9. De-Identified Data**

De-Identified Data means data that cannot reasonably be linked to an identified or identifiable individual.

If the COMPANY is in possession of de-identified data, then the COMPANY shall:

- a. Take reasonable measures to ensure that the data cannot be associated with an individual;
- b. Publicly commit to maintaining and using de-identified data without attempting to re-identify the data; and
- c. Contractually obligate any recipients of the de-identified data to comply with all provisions of the ICDPA.

## **10. Limitations**

Nothing in this Privacy Policy shall be construed to restrict the COMPANY's ability to:

- a. Comply with federal, state, or local laws, rules, or regulations;

- b. Comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, local, or other governmental authorities;
- c.. Cooperate with law-enforcement agencies concerning conduct or activity that the COMPANY reasonably and in good faith believes may violate federal, state, or local laws, rules, or regulations;
- e. Investigate, establish, exercise, prepare for, or defend legal claims;
- f. Provide a product or service specifically requested by a consumer, perform a contract to which the consumer is a party, including fulfilling the terms of a written warranty, or take steps at the request of the consumer prior to entering into a contract;
- g. Take immediate steps to protect an interest that is essential for the life or physical safety of the consumer or of another natural person, and where the processing cannot be manifestly based on another legal basis;
- h.. Prevent, detect, protect against, or respond to security incidents, identity theft, fraud, harassment, malicious or deceptive activities, or any illegal activity; preserve the integrity or security of systems; or investigate, report, or prosecute those responsible for any such action;
- i. Engage in public or peer-reviewed scientific or statistical research in the public interest that adheres to all other applicable ethics and privacy laws and is approved, monitored, and governed by an institutional review board, or similar independent oversight entities that determine: (i) if the deletion of the information is likely to provide substantial benefits that do not exclusively accrue to the controller; (ii) the expected benefits of the research outweigh the privacy risks; and (iii) if the COMPANY has implemented reasonable safeguards to mitigate privacy risks associated with research, including any risks associated with reidentification;
- j. Assist another company, controller, processor, or third party with any of the obligations under the ICDPA; or
- k. Alter this Privacy Policy to comply with any changes in the ICDPA.

## **11. Reservation to Update**

The COMPANY hereby reserves all right to update this Supplemental disclosure based on changes in the Indiana statute any applicable Indiana case law.