

# RPM International Inc.

## Privacy Notice

Last Updated: January 1, 2025

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### **JURISDICTIONAL DATA PRIVACY RIGHTS**

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RPM International Inc., and its affiliates, subsidiaries, and operating companies (the “**Company**,” “**us**,” “**we**”) understands the importance of protecting your privacy, and this Privacy Policy sets out how we process personal information. It describes, among other things, the types of personal information that we collect, the purposes for which we use it, the types of third parties with whom we share it, and the rights and responsibilities you may have with respect to it.

This Privacy Policy applies to the personal information you provide us when you (i) visit any website or interact with software that we own, license, or otherwise operate and that links to this Privacy Policy (each, a “**Site**”), (ii) purchase or receive products, goods, or services through the Site, or (iii) visit our offices or otherwise contact or engage with us. For purposes of this Privacy Policy, the Site and all products, goods and services sold or furnished by the Company through a Site shall be referred to collectively as the “**Services**.”

**PLEASE READ THIS PRIVACY POLICY CAREFULLY AS IT DESCRIBES YOUR RIGHTS, RESPONSIBILITIES, AND LIABILITIES. BY ACCESSING OR USING THE SERVICES OR OTHERWISE PROVIDING US WITH PERSONAL INFORMATION, YOU ARE CONSENTING TO THE TERMS OF THIS PRIVACY POLICY AND THE COMPANY’S [TERMS OF USE](#) AND ANY APPLICABLE COOKIE POLICY ON A SITE.**

You must be at least eighteen (18) years of age to access the Services. RPM International Inc. is headquartered in the United States, and the personal information you provide to the Company may be processed and stored in the United States and other jurisdictions. For more information on our data transfer practices, please see Section 10 (Data Transfers).

## 1. Scope

In most instances this Privacy Policy will apply to personal information that the Company receives during its business operations as a “**data controller**”. This means we determine the purpose and means of processing such personal information. For purposes of this Privacy Policy, the term “**personal information**” means any information that, alone or in conjunction with other information or data, identifies or is linked to a natural person and that is subject to, or otherwise afforded protection under, a data protection law, statute, or regulation. The term “personal information” does not include anonymized or de-identified data that is not attributable to a particular individual, household, or device and that is not otherwise subject to a data protection law, statute, or regulation. The Company may anonymize or de-identify personal information, and such data is not subject to this Privacy Policy, and the Company may use such data for any purpose. In some instances, the Company may receive your personal information as a “data processor”. This means that another party determines the purpose and means of processing such personal information. In such cases the Company will process your Personal Information only on the written instructions of the data controller and to the extent reasonably necessary or appropriate for the performance of the services to which it is engaged, including the transfer of personal data to third countries, unless provided otherwise by Personal Data Protection Laws to which the Company is subject.

## 2. The Types and Categories of Personal Information We Collect

The Company collects personal information in order to provide our Services, comply with our legal obligations, promote our business interests, and for the other reasons set forth in this Privacy Policy. When you do not provide personal information to the Company, we may not be able to provide you the Services or to complete a transaction you requested. Generally, we collect the following types and categories of personal information during our business operations:

Personal Information	
Category	Description/Examples
Personal Identifiers	Identifiers, such as your name, alias, shipping address, email address, account name, telephone number, customer identification number.
Registration Data	Information provided when you register for an account to use the Site, including usernames and passwords.
Online Identifiers (For more information, see “Technical Data” below)	Persistent identifiers that can be used to recognize you or your device over time and across different Services, including a device identifier, an Internet Protocol (IP) address, cookies, beacons, pixel tags, mobile ad identifiers, and similar technology.
Commercial Information	Records of the Services you purchased, obtained, or considered, or your other purchasing or consuming histories or tendencies with respect to our Services.
Business Contact Data	Information related to employees, owners, directors, officers, or contractors of a third-party organization (e.g., business, company, partnership, sole proprietorship, nonprofit, or government agency) with whom we conduct, or possibly conduct, business activities.
Product Training Data	Information related to education sessions, performance records, and completion history of trainings, courses, or similar events you attended which are offered by the Company.
Health Data	You may furnish us with, or we may otherwise collect your,

	health-related information in the event you, or a third party, suffers an injury or illness while visiting our physical locations or premises, or when using our Services.
Biometric Data	We may, in limited circumstances, collect and retain biometric data. Please see section 17 for more information.
Marketing and Communications Data	Information with respect to your marketing preferences and your subscriptions to our publications and alerts.
Internet and Electronic Network Data	Data pertaining to your access to or use of the Site, including browsing history, search history, and information regarding your interaction with the Site or advertisements embedded on the Site or other third-party websites, and information derived from any device that connects to our Wi-Fi services.
Your Feedback	Information you provide about our Services, which may include data gathered from any Company surveys or reviews submitted by you.
Visitor Information	Information an individual provides when visiting any of our physical locations or premises, including visitor logs and registries, vehicle and parking information.
Audio, Video and Images	In some circumstances, you may provide us images (e.g., your use of a Service) or we may record your audio/voice and image via a video camera (e.g., on-premises security systems), telephone helpdesk service or through video teleconferencing, or a virtual assistant or chatbot on the Site. In the event, we provide, and you use a virtual assistant or chatbot feature on the Site, we may collect, record, and retain your image, voice, and conversations captured therein. See section 21 for more information.
Geolocation Data	Information about the general city, state, or region in which a user of the Site resides.
Professional or Employment Data	If you apply for a job with the Company, we collect information set forth in a resumé, curriculum vitae, cover letter, and similar documentation, including contact details, employment history, skills, or qualifications, education level, job compensation and benefit preferences, criminal record, credit history and similar data, and information provided about or by your references.
Inferences	Inferences drawn from some of the personal information categories identified herein and used to create a consumer profile reflecting your purchasing and marketing preferences, characteristics, and behavior.

### 3. Technical Data

When you access the Site, we collect certain data automatically using technical means and tools. From time to time, the Company or its service providers may release aggregate and de-identified reports derived from this technical and usage information (for example, by publishing a report on trends in the usage of our Site or service provider's platforms). This data relates to your device, and your experience on the Site and other websites, including the following:

Usage and Device Data. When you access and use the Site, we automatically collect details of your access to and use of the Site, including traffic data, usage logs and other communication data, and the resources that you access and use on or through the Site (e.g., browsing history, search history). We may also collect information about your device and internet connection, including the device's unique identifier (e.g., device type, IMEI, Wi-Fi MAC, IP address), operating system, browser type, and mobile network information. The Site may collect "diagnostic" data related to your use of the Site, such as crash data and logs, performance data (e.g., launch time, hang rate, or energy use), and any other data collected for the purposes of measuring technical diagnostics.

Cookies and Tracking Data. We use "cookies" and other tracking technologies within the Site. A cookie is a small file placed on your smartphone or other device. You may refuse to accept certain cookies by activating the appropriate setting on your smartphone or device or by changing your cookie preferences on a Site. However, if you disable certain cookies, some parts of the Site may become inaccessible or not function properly. In addition, the Site may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us to analyze data on your use of the Site (e.g., recording the popularity of certain content and verifying system and server integrity). The Site may collect data about the advertisements you have seen or engaged. For more information, see our Cookie Policy. From time to time, we may use on our Site certain third-party cookies and pixels provided by our marketing partners, including social media companies. To the extent we use such third-party cookies and pixels, you hereby agree to the terms and conditions set forth by those third parties, which may include [Meta](#), [X](#) (formerly Twitter), [TikTok](#), and [LinkedIn](#), among others.

Site Monitoring. We also use cookies and other tracking technologies within the Site to monitor and record any and all activities and communications to, from, and on, the Site in order to safeguard, improve, and analyze usage of, the Site, and for the other purposes listed in this Privacy Policy. For the avoidance of doubt, you hereby acknowledge, agree, and consent to, such monitoring and recording.

Non-Cookie Technologies. We may deploy on our Site certain types of "Non-Cookie Technologies" provided by our service providers to support our digital advertising programs. These technologies often include browser cache, locally stored objects, or the creation of a statistical identifier wherein an identifier, much like a cookie identifier, is calculated based on the characteristics of a browser or device that distinguishes it from other browsers or devices. These identifiers are calculated either from the data your browser or device shares automatically or with additional data specifically requested from your browser or device. For more information, see [\[here\]](#).

#### **4. Sources of Information**

First Party / Direct Collection. We collect personal information directly from you when you use our Services (e.g., account registration, completing purchases, signing-up for subscriptions), when you provide a Product Review (as defined below), or whenever you directly engage with us, such as when you visit our offices or premises or otherwise contact us.

Automated Collection. We may collect information and data, such as usage data and cookies, through automated means when you use the Site (see "Technical Data" above).

Third-Party Sources. In accordance with applicable law, the Company may collect personal information about you from third parties, such as publicly available databases, advertising companies, social media websites and applications, and combine it with information we already

hold about you in order to help us improve and customize our Services and for other purposes set forth in this Privacy Policy. In addition, we may collect personal information from third-party service providers so we can assess whether to pursue a business relationship with you and for “background”, “credit” check or due diligence processes. We may also collect your contact information from your employer or other third parties to facilitate or otherwise engage in traditional business activities and similar administrative matters.

## **5. How We Use your Information / Purpose of Collection**

We may use the personal information we collect about you in order to perform our Services, comply with our legal obligations, and promote our business interests.

<b>How Your Personal Information Is Used</b>
Provide, operate, maintain, improve, and promote our Services.
Enable you to access and use our Services.
Process and complete transactions, and send you related information, including purchase confirmations and invoices.
Send you messages and communications related to our Services (e.g., responses to your comments, questions, and requests, customer services).
Furnish technical notices, updates, security alerts, and support and administrative messages to you about our Services.
Provide you promotional and marketing communications (e.g., information about our Services, features, surveys, newsletters, offers, promotions, contests, and events).
Process and deliver contest or sweepstakes entries and rewards.
Monitor and analyze trends, usage, and activities in connection with our Services to promote our business interests.
Investigate and prevent fraudulent transactions, unauthorized access to or use of our Services, and other illegal activities.
Personalize our Services, including providing features or advertisements that match your interests and preferences.
Any other purpose for which we obtain your consent.

For the avoidance of doubt, you hereby agree that the Company may contact you via any means, including via SMS/text message and email and through the use of autodialing systems and services, to furnish you information regarding a product order, shipping status, warranty-related information, and similar data and information pertaining to a commercial transaction.

## **6. Sharing Information / Third-Party Disclosures**

We may share your personal information with certain organizations and third parties in accordance with applicable law, including as set out below.

Intra-Group. The Company is composed of affiliates and operating businesses all over the world, and we may disclose your personal information to such affiliates and operating businesses to facilitate the purposes for which the personal information was collected including to provide, operate, maintain, improve, and promote our Services. For a list of the Company’s affiliates and operating businesses that may collect, process, and exchange your personal information, please see <https://www.rpminc.com/leading-brands/>.

Service Providers. We may share your personal information with companies that provide services on our behalf, such as hosting and analyzing the Site, conducting surveys, benchmarking and marketing on our behalf, processing transactions (including order fulfillment, rebates and returns), tracking and responding to consumer questions or complaints, and performing analyses to improve the quality of our Services.

Payment Card Transactions. Online payments for purchases made through the Site may be completed using third-party vendors' online payment systems. In such cases the Company will not have access to your credit card information. Any personal or financial information you provide to our third-party online payment systems is subject to the third party's privacy policy and terms of use, and we recommend you review these documents before providing any personal or financial information. The Company may, from time to time, facilitate payment card transactions outside the Site, including (but not limited to) transactions completed over the telephone.

Distributors and Business Partners. We may share your personal information with third parties that distribute our goods, products, and marketing materials.

Marketing Partners. The Company has partnered with third-party service providers with whom we share Online Identifiers concerning your use of the Site, which are derived through the cookies, pixels, and tags we use on our Site. If you would like to opt out from this information sharing, please click on the cookie management tool to set your preferences. See the Cookie Policy, if available, on each Site for a list of our service providers who provide us cookies, pixels, and tags.

Business Restructuring. Circumstances may arise where for strategic or other business reasons the Company decides to sell, buy, divest, merge or otherwise reorganize our businesses. We may disclose your personal information to the extent reasonably necessary to proceed with the negotiation or with the completion of a merger, acquisition, divestiture or sale of all or a portion of the Company's assets.

Legal; Compliance; Legitimate Interest. We may disclose personal information to a third party (i) if required by law or government order, or with a legal process, (ii) when necessary to defend or protect our legal, regulatory, or business interests, (iii) to protect and defend our rights or property, or (iv) in urgent circumstances, to protect the health and personal safety of any individual.

Consent. In addition to the reasons for disclosure set forth above, we may also disclose your personal information when you consent to the disclosure.

In the event that you facilitate a transaction with the Company, or request information from or otherwise engage with us, and such activities require the Company to share your personal information with a service provider or other third party, you hereby consent to such disclosure and/or direct the Company to intentionally disclose your personal information to the service provider or third party.

## **7. Social Media**

We may engage with you on various social media platforms (e.g., Facebook, Twitter, YouTube, Pinterest, Instagram). If you contact us on a social media platform for customer support or for other reasons, we may contact you via the social media's direct message tools. Your use of a social media platform is subject to the policies and terms of the relevant social media platform. Certain social media platforms may also automatically provide us with your personal information, and the information we receive will depend on the terms that govern your use of the social media platform(s) and any privacy settings you may have set.



The Site may, from time to time, include social media features and widgets (e.g., the “Facebook Like” button, the “Share This” button) or interactive mini-programs that run on the Site. These features may collect your IP address and which Site page you are accessing and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on the Site. Your interactions with these features are governed by the privacy statement of the relevant social media platform that provides them.

According to the terms and conditions governing certain social media platforms, you may request that the information, data, or other content we obtain from or through the social media platform (“**Platform Data**”) be deleted or modified. If you would like Platform Data related to you deleted or modified, please contact us in accordance with the “Contact Us” section below and (i) identify the social media platform at issue and (ii) the Platform Data that you would like deleted and/or modified, and if modified, the modification to said Platform Data. We may also delete Platform Data if requested by the social media platform.

## **8. Links to Other Websites; Your Direct Third-Party Disclosures**

This Privacy Policy only governs your use of our Services (as defined above), and the Company is not responsible for the content or privacy practices employed by any third party. As a resource to you, the Site may include links to third-party websites or provide you the opportunity to disclose information directly to third parties (e.g., credit card processors). Please be aware that third-party websites may include a Company logo, may be linked to the Site, or may otherwise appear to be affiliated with the Company. Our Privacy Policy does not apply to such third-party websites or organizations. You assume all privacy, security, and other risks associated with providing any data, including personal information, to third parties via the Services. For a description of the privacy protections associated with providing information to third parties, you should refer to the privacy statements, if any, provided by those third parties.

## **9. Data Retention**

How long we keep your personal information varies depending on why it was collected. We keep personal information to provide you with our Services, to facilitate transactions you have requested, or to engage in marketing activities, and for as long as is necessary to defend our legal or business interests. For example, where you have made a purchase with us, we will keep a record of your purchase for the period necessary for invoicing, tax and warranty, and liability purposes. We may also keep a record of correspondence with you (e.g., if you have made a complaint about a product) for as long as is necessary to protect us from a legal claim. Please note that where you unsubscribe from our marketing communications, we will keep a record of your email address to ensure we do not send you marketing emails in the future.

## **10. Data Transfers**

RPM International Inc. is headquartered in the United States, and the personal information that the Company collects and processes may be retained and stored in the United States. The Company uses service providers that store personal information on our behalf in the United States and in other third countries. Please be aware that the United States, and these other third countries, may not provide the same level of protection of personal information as in your country, state, or other jurisdiction of residence or nationality, and when transferred to the United States or elsewhere, your personal information may be accessible by, or otherwise made available to, local government authorities and officials pursuant to judicial and/or administrative orders, decrees, and demands, and/or other domestic laws, statutes, and regulations. By continuing to provide us such

information, you hereby acknowledge and agree that your personal information will be transferred to, and stored in, the United States and in such other third countries.

## 11. Security

We use a variety of security technologies and procedures to help protect your personal information from unauthorized access, use, or disclosure. **HOWEVER, NO INFORMATION SYSTEM CAN BE FULLY SECURE, AND WE CANNOT GUARANTEE THE ABSOLUTE SECURITY OF YOUR PERSONAL INFORMATION. MOREOVER, WE ARE NOT RESPONSIBLE FOR THE SECURITY OF PERSONAL INFORMATION YOU TRANSMIT TO THE SITE AND/OR THE SERVICES OVER NETWORKS THAT WE DO NOT CONTROL, INCLUDING THE INTERNET AND WIRELESS NETWORKS, AND YOU PROVIDE US WITH ANY PERSONAL INFORMATION AND DATA AT YOUR OWN RISK. TO THE EXTENT PERMITTED BY LAW, WE SHALL NOT BE LIABLE OR OTHERWISE RESPONSIBLE FOR ANY DATA INCIDENT OR EVENT CAUSED BY A THIRD PARTY THAT COMPROMISES THE CONFIDENTIALITY, INTEGRITY, OR SECURITY OF YOUR PERSONAL INFORMATION.** The safety and security of your personal information also depends on you. Where we have given you (or where you have chosen) a username and password to access our Services, you are responsible for maintaining the security and confidentiality of those credentials and not revealing them to others. You must contact us immediately if you have reason to believe that your username or password to our Services has been compromised. You acknowledge and agree that we may contact you via email or other electronic communications in the event we are legally required to notify you of a data security incident or event related to your personal information.

## 12. No Data Collected from Children

The Site is not directed at, nor intended for use by, children. As a result, if you are under the age of eighteen (18), you are prohibited from accessing or using the Services (including the Site) or providing us with your personal information. If the parent or guardian of a child under the age of eighteen (18) believes that the child has, or if you are under the age of 18 and believe that you have, provided us with any information, the parent or guardian of that child should contact us if they want this information deleted from our files, and we will undertake commercially reasonable efforts to comply with the request.

## 13. Publicly Posted Information; Product Reviews

You may, from time to time, have the ability to submit via the Site a comment on, provide an opinion about, rate, or otherwise discuss our Services (a “**Product Review**”). In other circumstances, you may directly provide us feedback on our business, our business sector, or the Services (“**Feedback**”). Any information or content you post in a Product Review or in your Feedback may be available to other users of the Site (and our social media platforms) and may be retrievable by third-party search engines, and third parties may also be able to download or share your Product Review and Feedback to social media websites or elsewhere. We recommend that you guard your privacy and anonymity and not upload any information in your Product Review and Feedback that you wish to remain confidential. Any third party with access to your information via the Site will be permitted to use the information in the same manner as if you submitted the information directly to that third party. Publicly posting any information on the Site is entirely voluntary on your part, and we recommend you carefully consider the information you choose to make publicly available. As between you and the Company, any and all Product Reviews and Feedback shall be considered the Company’s confidential and proprietary information. In order for the Company to utilize such Product Reviews and Feedback, you grant to the Company a non-exclusive, perpetual, irrevocable, worldwide, royalty-free license, with the right to sublicense, under all relevant intellectual property rights, to use, publish, and disclose such Product Reviews and



Feedback in any manner we choose and to display, perform, copy, make, have made, use, sell, and otherwise dispose of the Company's and our sub-licensees' products or services embodying such Product Reviews and Feedback in any manner and via any media we choose, without reference to the source. The Company shall be entitled to use Product Reviews and Feedback for any purpose without restriction or remuneration of any kind with respect to you and/or your representatives.

#### **14. Your Responsibilities**

You are permitted, and hereby agree, to only provide personal information to the Company if such personal information is accurate, reliable, and relevant to our relationship and only to the extent such disclosure will not violate any applicable law, statute, or regulation or infringe upon a person's data privacy rights or privileges. **IF YOU PROVIDE PERSONAL INFORMATION (INCLUDING PERSONAL INFORMATION CONCERNING A THIRD PARTY) TO THE COMPANY, YOU EXPRESSLY REPRESENT AND WARRANT TO THE COMPANY THAT YOU HAVE THE FULL RIGHT AND AUTHORITY TO PROVIDE THE COMPANY WITH SUCH PERSONAL INFORMATION (INCLUDING PERSONAL INFORMATION CONCERNING A THIRD PARTY) AND THAT THE COMPANY'S USE AND PROCESSING OF SUCH PERSONAL INFORMATION AS SET FORTH HEREIN WILL NOT VIOLATE ANY PERSON'S RIGHTS OR PRIVILEGES, INCLUDING RIGHTS TO PRIVACY. YOU HEREBY AGREE TO FULLY AND COMPLETELY INDEMNIFY THE COMPANY FOR ANY CLAIMS, HARM, OR DAMAGES THAT MAY ARISE FROM YOUR PROVISION OF PERSONAL INFORMATION (INCLUDING PERSONAL INFORMATION CONCERNING A THIRD PARTY) TO THE COMPANY.**

#### **15. Updating Your Information**

It is important that the personal information that you provide to us is accurate and reliable. In certain circumstances, you may have the ability to directly edit your online account with the Company to update and change your personal information (e.g., name, telephone number, email, shipping address), and you must do so when such changes are warranted. If your account does not contain such an editing feature, then you must notify the Company directly of any changes or updates to your personal information in accordance with the "Contact Us" section listed below.

#### **16. Email Marketing Opt-Out**

You have the right to opt out of receiving email marketing communications and direct-mail marketing from us. Where required by law, the email marketing communications that you receive from us will provide you an option to "unsubscribe" from receiving future email marketing communications from us. You may also unsubscribe from email and direct-mail marketing by contacting us in accordance with the "Contact Us" section listed below. Due to production, mailing and system timelines, it may take some time to process your request. Until your requested change takes effect, you may still receive communications from us. If you send us your request by regular mail, please allow extra time for us to receive your notice. Please note: Although you may have opted not to receive communications, you may still receive business-related communications such as order confirmations, product recall notices, membership information, or other communications that are necessary to complete your transaction. You hereby agree to immediately notify the Company, in writing, in the event you no longer own, license, or use an email address to which you subscribed to receive email marketing from us.

#### **17. Biometric Data**

Where permitted by law and in certain limited circumstances, the Company may collect biometric data and biometric identifiers related to our customers, suppliers, service providers, employees,

temporary workers, contractors, or agents. For example, the Company may use cameras, kiosks, and similar devices and technology to collect, retain, and use information derived from the scanning of a person's facial geometry or thermal temperature in order to facilitate the Company's health and safety screening programs, and for other security-related purposes. In other circumstances, the Company may collect biometric data or biometric identifiers from individuals that are accessing sensitive areas of the Company's facilities or for other administrative (e.g., timekeeping) or security functions and purposes. The Company will retain such biometric identifiers for no longer than as is permitted by law, but in no event longer than a) one (1) year after the applicable individual's last interaction with the Company, or b) as is necessary to fulfill its collection purpose. The Company will maintain protocols for the security and destruction, or disposal of, biometric identifiers in a manner that complies with applicable data protection law and renders such data and identifiers unreadable so as to remove any potential for its reuse or re-identification. Barring any applicable law to the contrary, the Company may disclose and disseminate biometric identifiers to third parties in the same manner as it may disclose and disseminate personal information to third parties in accordance with this Privacy Policy, and such disclosures of biometric identifiers may include to third party service providers and law enforcement or regulatory agencies, where permitted by law.

## **18. Do-Not-Track Signals**

Some web browsers may transmit "do-not-track" signals to the Site with which the user communicates. Because of differences in how web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they are even aware of them. Unless otherwise required by law, we currently do not take action in response to these signals.

## **19. Persons with Disabilities**

The Company strives to ensure that every person has access to information related to our Services, including this Privacy Policy. Please contact us in accordance with the "Contact Us" section listed below if you would like this Privacy Policy provided in an alternative format, and we will seek to meet your needs.

## **20. Rewards Programs and Financial Incentives**

We collect and use personal information, including personal information provided by a third party to administer and maintain our financial incentive, rewards, and loyalty programs ("**Rewards Programs**"). We use the personal information you provide in these programs to verify your identity, offer unique rewards, track your program status, and facilitate the exchange of program points for products, promotional materials, training workshops, and other items. If you consent to participate in any of our Rewards Programs, you may withdraw that consent at any time by contacting us in accordance with the "Contact Us" section listed below or in accordance with the instructions set forth in the applicable Rewards Program's terms and conditions. The Company may use personal information gathered from, or related to, participants in our Rewards Programs for any other purpose or in any other manner set forth in this Privacy Policy.

## **21. Events and Video Teleconferencing**

Conference Platforms. The Company uses web-based conferencing platforms and applications (each a "**Conference Platform**") for the purpose of hosting or conducting video and audio meetings and conferences, webinars and similar training exercises, social events, and other types of video and audio meetings (collectively, "**Conferences**"). The type of personal data processed by the Company via a Conference Platform depends on the scope and nature of the Conference, and

may include your identity data, registration data, transaction data, technical data, and other information furnished to the Company during the Conferences. Please note that the Company, and our third-party service providers and partners, may record our Conferences, including the content of communications and activities that occur therein, and the Company may use and disclose such content, information and data for our own business purposes. By participating in a Conference, you hereby consent to such recording, use, and disclosures. You may, depending on the jurisdiction in which you reside, have the legal right to withdrawal your consent at any time by (i) providing written (email acceptable) or verbal notice to the Company prior to the start of the Conference, (ii) providing a verbal notice to the Company meeting host during the Conference, or (iii) activating, where technically feasible, “do not record” features within the Conferencing Platform. You must implement measures designed to ensure data and privacy protection in the background of your Conference (e.g., by notifying bystanders of the Conference, using the background masking function). You may not furnish a Company-provided access code or a link to a Conference without this, and all other appropriate, disclaimers attached thereto. Please see the privacy statement by Microsoft Teams for a description of its Conference Platform privacy practices. You may, depending on the jurisdiction in which you reside, request access to a Conference recording or transcript at any time. The Company prohibits third-party recording devices or processes, including chat/recording bots, on a Conferencing Platform, without advanced, express written permission from the Company’s IT Department.

Communications Content and Recordings. When you email, call, or otherwise communicate or interact with us or with other Company users, including if you sign up for our mailing lists, complete forms on our websites, interact with our social media pages, post a product review or testimonial, submit content in any online discussion groups, participate in a Conference, or otherwise enter information into public-facing comment fields, blogs, or community forums sponsored by or affiliated with the Company, we may collect and maintain records of your contact details, communications and interactions, your posts or submissions, and our responses, if applicable. We, and our third-party service providers and partners, may also collect and record any information you submit through our websites and online services, such as during a through our Conference Platforms, chat functions, or virtual assistants, and we may also maintain communication records regarding information provided to us related to any customer support requests.

## **22. Canada Privacy Rights**

Personal data (as the term is defined in the Personal Data Protection and Electronic Documents Act of Canada (“**PIPEDA**”)) shall be synonymous with personal information, where permitted, and will be collected, stored, used and/or processed by the Company in accordance with this Privacy Policy and the Company’s obligations under PIPEDA and other applicable Canadian provincial laws. Pursuant to these Canadian laws, you have a right to request access to your personal information and to request that inaccurate personal information be corrected. If you have submitted personal information to us and would like to have access to it, or have it corrected, please contact us in accordance with the “Contact Us” section listed below. When requesting access to, or correction of, your personal information, we will require that you verify our request via email, and we will request specific data from you to enable us to confirm the authenticity of the request and your identity, and to enable us to search our records and databases. We may charge you a fee to access your personal information, provided that we advise you of any such fee in advance. Your right to access personal information is not absolute, and we may not be able to allow you to access certain personal information in certain circumstances (e.g., if the information contains personal information of other persons or it is subject to legal privilege). In the event that we cannot provide you with access to, or the ability to correct, your personal information, we will use reasonable means to inform you of the reasons why, subject to any legal or regulatory restrictions. To delete your name from our electronic contact lists (text or email), please follow the applicable opt-out instructions listed above (see “Email Marketing and Your Rights”) or contact us in accordance with

the “Contact Us” section listed below. If you have concerns with our data processing, you may file a complaint with the Office of the Privacy Commissioner of Canada. Please refer to the Office of the Privacy Commissioner of Canada for more information.

## **23. European Union (EU), Switzerland, and United Kingdom (UK)**

Data Protection Rights. If you are located in the EU, Switzerland, or the UK, you have the following data protection rights:

- *Right to Know.* The right to know about what personal information the Company collects and processes about you, including the types and categories of personal information we collect and process, the sources of such personal information, our retention criteria, with whom we share your personal information, cross-border data transfers, and how to file complaints and inquiries. Such information is set forth in this Privacy Policy.
- *Automated Decision Making.* The Company does not engage in any activity that subjects our customers, Site users, survey participants, or others to a decision based solely on automated processing, including profiling, which produces legal effects, or similarly significant results, impacting them.
- *Access Rights.* You may ask us whether we process any of your personal information and, if so, receive access to such personal information. When complying with an access request, we will also provide you with additional information, such as the purposes of the processing, the categories of personal information concerned as well as any other information necessary for you to exercise the essence of this right.
- *Rectification.* You have the right to have your personal information corrected/rectified in case of inaccuracy or incompleteness. Upon request, we will correct inaccurate personal information about you and, taking into account the purposes of the processing, update any incomplete personal information, which may include the provision of a supplementary statement.
- *Erasure.* You have the right to have your personal information erased, which means the deletion of your personal information by us and, where possible, any other controller to whom your data has previously been disclosed. However, your right to erasure is subject to statutory limits and prerequisites (e.g., where your personal information is no longer necessary in relation to the initial purposes for which it was processed, your personal information was processed unlawfully).
- *Restriction of Processing.* You have the right to obtain the restriction of the processing of your personal information, which means that we suspend the processing of your personal information for a certain period of time. Circumstances which may give rise to this right include situations where the accuracy of your personal information is contested, but we need time to verify the inaccuracy (if any) of your personal information.
- *Data Portability.* You have the right to request us to provide you with your personal information in a structured, commonly used and machine-readable format and to have such data transmitted directly to another controller, where technically feasible.
- *Right to Object.* You have the right to object to the processing of your personal information, which means you may request us to no longer process your personal information. This only applies in case the “legitimate interests” ground (including profiling) constitutes the legal basis for processing (see below “Legal Basis for Processing”). However, at any time (and free of charge) you can object to having your personal information processed for direct marketing purposes.
- *Withdrawing Consent.* You also may withdraw your consent at any time if we are solely relying on your consent for the processing of your personal information. However, this will not impact our legal basis to process such personal information prior to the withdrawal of your consent.

To exercise any of these data privacy rights, please contact us, or have your designated agent contact us, in accordance with the “Contact Us” section listed below. To the extent permitted by law, we will need to verify your identity (or the identity of your agent) and ensure the authenticity of your request.

Legal Basis for Processing. We process your personal information in accordance with the legal bases set forth in law. For example, our processing of personal information (as described herein) is justified based on the following legal grounds:

- *Consent.* Processing is based on your consent (e.g., you register to receive our marketing materials, you voluntarily contact us).
- *Legitimate Interests.* Processing is necessary for our legitimate interests as set out herein (e.g., monitoring your use of the Site and your compliance with the terms and conditions governing the same, improving our Services).
- *Contract Undertaking.* Processing is necessary for the performance of a contract to which you are a party (e.g., you purchase or consider purchasing our Services).
- *Legal Compliance.* Processing is required to comply with a legal or statutory obligation (e.g., tax disclosures).

Complaints. In the event you have concerns about our data processing, you have the right to file a complaint with your data protection authority. For data protection authorities in the EU, please see here: [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en). For the data protection authority in Switzerland, please contact the Federal Data Protection and Information Commissioner (<https://www.edoeb.admin.ch/edoeb/en/home.html>). For the data protection authority in the UK, please contact the Information Commissioner’s Office ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the opportunity to deal with your concerns before you approach a data protection authority with a complaint, and invite you to contact us in the first instance.

## **24. California Privacy Rights**

Data Privacy Rights. If you are a resident of California you have the following data privacy rights:

- *Right to Know* (Specific Pieces of Personal Information). You have the right to know the specific pieces of your personal information that we have collected about you.
- *Right to Know* (Categories of Personal Information). You have the right to know (i) the categories of personal information we have collected from you; (ii) the categories of sources from which the personal information is collected; (iii) the categories of your personal information we have sold or disclosed for a business purpose; (iv) the categories of third parties to whom your personal information was sold or disclosed for a business purpose; and (v) the business or commercial purpose for collecting or selling your personal information.
- *Right to Delete.* You have the right to request that we delete your personal information that we have collected and retained.
- *Right to Correct.* You have the right to request that we correct inaccurate personal information that we have collected and retain.
- *Nondiscrimination.* You have the right not to be subject to discrimination for asserting your rights under the CCPA.

Submit a Privacy Request. To submit a privacy request, you may contact us using any of the following means: (email) [dataprotection@rpm-inc.com](mailto:dataprotection@rpm-inc.com), (webform) <https://www.rpm-inc.com/contact-rpm/>, (telephone) 1 (800) 776-4488, or (mail) RPM International Inc., ATTN: Privacy Request, 2628 Pearl Road, Medina, OH 44256. If you would prefer, you may designate an authorized agent to submit a CCPA privacy request on your behalf. An authorized agent must be registered with the



California Secretary of State to conduct business in California.

Privacy Request Verification Process. If you (or your authorized agent) make any request related to your personal information, the Company will ascertain your identity (and the identity of the authorized agent, to the extent applicable) to the degree of certainty required or permitted under the law before addressing your request. In particular, the Company will, to the extent required or permitted by law, require you (or your authorized agent) to verify your request via email, request certain contact information or government identifiers, and we will match at least two pieces of such personal information with data that we have previously collected from you before granting you access to, erasing, or correcting, specific pieces or categories of personal information, or otherwise responding to your request. We may require written documentation that demonstrates a third party is authorized to serve as your agent for the purposes of submitting the requests set forth herein, unless you have provided the authorized agent with power of attorney pursuant to California Probate Code §§ 4121 to 4130. None of the CCPA's rights, as amended by the CPRA, are absolute, and such rights are subject to legal and regulatory exceptions and exemptions. For more information about the CCPA or the CPRA, please see: <https://oag.ca.gov/privacy/ccpa>.

Opt-Out Rights / Do Not Sell My Personal Information. California residents have the right to opt out of the "sale" of their personal information. However, the Company does not sell your personal information to third parties for profit or monetary or other valuable consideration, and therefore we do not provide opt-out request processes for the sale of personal information (because we do not undertake such activities).

Opt-Out Rights / Do Not Share My Personal Information. California residents have the right to opt out of the "sharing" of their personal information. The Company uses third-party analytical and targeted advertising features on our Site and similar web tools provided by our marketing partners, and such features, tools and marketing relationships involve the disclosure of your personal information to third parties and may constitute the "sharing" of your personal information. To opt out of this sharing of your personal information in these circumstances, please click on the cookie management/settings tool (sometimes visible as a "Cookie Settings") link on the footer of the Site to set your cookie preferences. You, or your authorized agent, may also contact us in accordance with the "Contact Us" section listed below.

Children. The Site is not directed at, and should not be used by, minors under the age of eighteen (18), and therefore the Company does not knowingly sell or share the personal information of minors under eighteen (18) years of age.

Limit Use of Sensitive Personal Information. The Company does not use or disclose sensitive personal information for reasons other than those set forth in the CCPA, and therefore we do not provide individuals with the ability to limit how we use or disclose such sensitive personal information.

## **25. U.S. State Privacy Rights (General)**

Data Privacy Rights. Pursuant to certain U.S. state privacy laws, you may have the following privacy rights with respect to your personal information:

- To confirm whether or not we are processing your personal information and access such personal information.
- To correct inaccuracies in your personal information, taking into account the nature of the personal information and the purposes of the processing of your personal information.
- To delete personal information provided by, or obtained about, you.

- To obtain a copy of your personal information processed by us, in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance.
- To obtain a list of the categories of third parties to which we have disclosed your personal data.

Submit a Privacy Request. To submit a privacy request, you may contact us using any of the following means: (email) [dataprotection@rpm-inc.com](mailto:dataprotection@rpm-inc.com), (webform) <https://rpm-inc.com/contact/>, (telephone) 1 (800) 776-4488, or (mail) RPM International Inc., ATTN: Privacy Request, 2628 Pearl Road, Medina, OH 44256. Where permitted by U.S. state law, you may designate an authorized agent to submit a privacy request on your behalf.

Privacy Request Verification Process. If you make any request related to your personal information, the Company will ascertain your identity (and the identity of the authorized agent, to the extent applicable) to the degree of certainty required or permitted under the law before addressing your request. In particular, before granting you access to, erasing, or correcting, specific pieces or categories of personal information or otherwise responding to your request, the Company will, to the extent required or permitted by law, (i) require you (or your authorized agent) to verify your request via email, (ii) request certain contact information or government identifiers, and (iii) match at least two pieces of such personal information with data that we have previously collected from you. None of your privacy rights are absolute, and such rights are subject to exceptions and exemptions.

Privacy Requests Appeals Process. If you would like to appeal a decision the Company has made with respect to your privacy request, please email us in accordance with the “Contact Us” section listed below, with the subject line “ATTN: Privacy Appeals,” and describe the nature of your request, and the reason for requesting an appellate review.

Opt-Out Rights / The Sale of Personal Information. You may have the right to opt out of the “sale” of their personal information. However, the Company does not sell your personal information to third parties for monetary consideration or other valuable consideration, and therefore we do not provide opt-out request processes for the sale of personal information (because we do not undertake such activities). Nevada residents may submit a request directing us to not sell personal information we maintain about them to third parties who will sell or license their personal information to others. If you would like to exercise this right (even though we do not sell or license personal information), please contact us in accordance with the “Contact Us” section listed below.

Opt-Out Rights / Targeted Advertising. You may have the right to opt out of having your personal information used for targeted advertising purposes. The Company uses third-party analytical and targeted advertising features on our Site and similar web tools provided by our marketing partners. To opt out of this sharing of your personal information in these circumstances, please click on the cookie management tool (sometimes visible as a “Cookie Settings” link) on the footer of the Site to set your cookie preferences.

Opt-Out Rights / Profiling. You may have the right to opt out of having their personal information used for profiling in furtherance of decisions that produce legal or similarly significant effects. However, the Company does not engage in such activities

Complaints. You may file a complaint about our data processing activities with your local authorities, which may include the following:

- [The Colorado Attorney General](#)
- [The Connecticut Attorney General](#)
- [The Delaware Attorney General](#)

- [The Iowa Attorney General](#)
- [The Montana Attorney General](#)
- [The Nebraska Attorney General](#)
- [The Nevada Attorney General](#)
- [The New Hampshire Attorney General](#)
- [The New Jersey Division of Consumer Affairs](#)
- [The Oregon Attorney General](#)
- [The Tennessee Attorney General](#)
- [The Texas Attorney General](#)
- [The Virginia Attorney General](#)

## **26. Changes to the Policy**

We reserve the right to amend this Privacy Policy at any time. The “Last Updated” date listed above will identify when this Privacy Policy was last amended. It is your responsibility to periodically review the Privacy Policy to determine whether any amendments have been made since your last interaction. Your use of the Services and continued use of the Services after any amendments are made to this Privacy Policy, signifies your consent to this Privacy Policy and any amendments reflected in the most recent version. We may, in our sole discretion, provide you communications, including via email or text messages, about changes to our Privacy Policy; however, such communications do not abrogate or otherwise limit your responsibility to periodically review the Privacy Policy to determine whether any amendments have been made.

## **27. Contact Us**

If you have any questions or concerns about this Privacy Policy, or would like to submit a privacy request, contact us using any of the following means: (email) [dataprotection@rpm-inc.com](mailto:dataprotection@rpm-inc.com), (webform) <https://rpm-inc.com/contact/>, (telephone) 1 (800) 776-4488, or (mail) RPM International Inc., ATTN: Privacy Request, 2628 Pearl Road, Medina, OH 44256.