

DATA PRIVACY PROCEDURE

1. Introduction

This procedure for Data Privacy describes the fundamental principles for protecting and constantly improving Brenntag Israel's business success in a full regard to its Data Privacy and Protection commitment.

The purpose of this procedure is to regulate standards of conduct a data privacy perception within Brenntag Israel.

2. Governing Texts

Data Protection in Israel is governed primarily by the Protection of Privacy Law, 5741-1981 ('the Privacy Law') and enforced by the Privacy Protection Authority ('PPA'). The Privacy Law covers collection and use of personal data and sensitive data, sets the rights and obligations of the parties collecting and using the data, including security requirements with respect thereto, and sets the rights afforded to individuals whose data is collected and used.

3. Key Acts & Regulations

Data protection in Israel is governed primarily by the Privacy Law and the regulations promulgated under it, the Basic Law: Human Dignity and Liberty, 5752-1992, and the guidelines of the Israeli regulator, the PPA (formerly known as the Israel Law, Information, and Technology Authority ('ILITA')) and additional legislation includes:

Protection of Privacy (Data Security) Regulations, 5777-2017 ('the Data Security Regulations');

Amendment No. 40 to the Communications Law (Telecommunications and Broadcasting), 5742-1982 ('the Anti-Spam Law');

The Administrative Offences Regulations (Administrative Fines and Protection of Privacy) 2004 ('the Administrative Fine Regulations');

Protection of Privacy Regulations (Transfer of Information to Databases Abroad), 5761-2001 ('the Transfer of Information Regulations');

Protection of Privacy Regulations (Conditions for Possessing and Protecting Data and Procedures for Transferring Data Between Public Bodies) 1986 and

Protection of Privacy Regulations (Conditions for Inspection of Data and Procedures for Appeal on a Denial of a Request to Inspect) 1981 ('the Data Inspection Regulations').

4. Territorial Scope

The Privacy Law does not explicitly determine its jurisdiction, nor does it require that the data subject be a resident or citizen of Israel. From this, one may conclude that the Privacy Law's jurisdiction is as of other Israeli laws, i.e., limited to acts within Israel. It is an unsettled legal question whether the Privacy Law applies to foreign entities processing personal information of Israelis, and whether it applies to Israeli entities processing personal information of non-Israelis. However, if the restrictions

on the transfer of data are breached, any subsequent use of the data outside Israel is likely to be attributed to the party in Israel who breached the transfer restrictions. Therefore, Brenntag Israel and all relevant third parties that engage with Brenntag Israel might be subjected to the outcomes and regulations of the mentioned laws.

5. Material Scope

The Privacy Law applies to and covers personal data and sensitive data. Therefore, although it is not stated clearly in the Privacy Law that it does not cover anonymous data, it is reasonably assumed that the Privacy Law does not cover anonymous data.

6. Key Definitions

The Privacy Law and Brenntag Israel's Data Policy Procedure regulate two principal matters, the general right to privacy and the protection of personal data in databases. The following terms are defined under the Privacy Law:

Data controller: The Privacy Law and Brenntag Israel's Data Policy Procedure do not use the terms 'data controller' and 'data processor' but rather refers to 'database owner', 'database holder', and 'database manager'.

Data processor: The Privacy Law and Brenntag Israel's Data Policy Procedure do not use the terms 'data controller' and 'data processor' but rather refers to 'database owner', 'database holder', and 'database manager'.

Personal data: Data regarding the personality, personal status, intimate affairs, state of health, economic situation, professional qualifications, opinions, and beliefs of a person.

Sensitive data: Data on the personality, intimate affairs, state of health, economic situation, opinions, and beliefs of a person, and other information if designated as such by the Minister of Justice, with the approval of a parliamentary committee (no such determination has been made to date). A comparison between the definitions of personal data and sensitive data reveals that sensitive data does not include data regarding a person's personal status and professional qualifications.

Data security: Protection of the data from disclosure, use, or copying performed without permission, or protection of the integrity of the data, i.e., that the data in the database is identical to the source from which they were extracted, and it has not been changed, delivered, or destroyed without permission.

Database: A collection of data, stored by magnetic or optical means and intended for computer processing, except for: a collection of data for personal use that is not business purposes; and a collection of data that includes only names, addresses, and contact information of persons which in itself does not create any characterisation that breaches the privacy of such persons, provided that neither the owner of the collection nor any corporation under its control has an additional collection of data.

Database holder: A legal person who has a database in its possession on a permanent basis and is permitted to use it.

Database owner: Not defined in The Privacy Law and Brenntag Israel's Data Policy Procedure. Some compare the role of the database owner to that of the data

controller under the General Data Protection Regulation (Regulation (EU) 2016/679) ('GDPR').

Database manager: The active manager of the legal entity which owns or possesses a database, or a legal person authorised to carry on such activities by the manager for this purpose.

Brenntag Israel, under these regulations of the Law, is in full commitment with data security with:

- drafting a database settings document (similar to a record of processing), that will include a general description of the collection and processing of data and details of any transfer of data from the database to another country;
- development and implementation of an information security policy and procedures, that will include provisions as to the physical security of the site where the infrastructure of the database is located, access authorisation to the database, and risks to which the database is vulnerable and how to resolve such risks, including by use of encryption mechanisms;
- taking reasonable measures, customary in employee sorting procedures, in order to verify that there is no concern that an employee should not be authorised to access the database;
- training and informing all employees of the requirements of the Privacy Law, the Data Security Regulations, and all relevant actions
- limitation or absolute prevention of the possibility to connect a portable device to the systems of the database, considering the sensitivity of the data contained in the database;
- documenting any security incident;
- conducting a periodical review and reporting the results to Brenntag Global GDP Office.

7. Our Commitment For Collection, Use, Disclosure and Other Processing of Personal Data

Brenntag Israel collects, uses, discloses and otherwise processes personal data within the scope of the operation of its Business.

We will only collect, use, disclose and process your personal data when the respective laws allow us to, commonly in the following circumstances:

- to perform our contractual obligations;
- for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and/or (iii) to comply with legal obligations.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw your consent given under this Privacy Policy at any time by contacting us.

We use your Personal Data for customer service purposes,

- including responding to your enquiries and conducting customers satisfaction survey to improve

- and enhance our service level. This typically requires the use of certain personal contact information and information regarding the reason for your inquiry (e.g. order status, technical issue, product question/complaint, general question, feedback, answers to survey).

Our reasons - Fulfilling contractual obligations; legal obligations; our legitimate interests.

Our legitimate interests - Improving and developing new products and services; being more efficient; enhance customers service level and customer satisfaction.

We use your Personal Data to provide you with information,

- about our goods or services (e.g. marketing communications or campaigns or promotions).
- This can be done via means such as email, ads, SMS, phone calls and postal mailings to the extent permitted by applicable laws.

This use of your Personal Data is voluntary, which means that you can oppose (or withdraw your consent in certain countries) to the processing of your Personal Data for these purposes.

Our reasons - With your consent (where required); fulfilling contractual obligations; our legitimate interests.

Our legitimate interests - Working out which of our products and services may interest you and telling you about them; defining types of customers for new products or services.

We use your Personal Data when you interact with third party social networking features,

- such as “Like” functions, to serve you with advertisements and engage with you on third party social networks.
- You can learn more about how these features work, the profile data that we obtain about you, and find out how to opt out by reviewing the privacy notices of the relevant third party social networks.

Our reasons - With your consent (where required); our legitimate interests.

Our legitimate interests - Working out which of our products and services may interest you and telling you about them; defining types of customers for new products or services.

We use your Personal Data to analyse your preferences and habits, to anticipate your needs based on our analysis of your profile, to improve and personalise your experience on our Websites

- to provide you with targeted advertising and content, and (vi) to allow you to participate in interactive features, when you choose to do so.
- The use of your Personal Data is voluntary, which means that you can oppose the processing of your Personal Data for this purpose.

Our reasons - With your consent (where required); our legitimate interests.

Our legitimate interests - Working out which of our products and services may interest you and telling you about them; defining types of customers for new products or services.

We use your Personal Data to process and ship your orders,

- inform you about the status of your orders, correct addresses and conduct identity verification and other fraud detection activities.
- This involves the use of certain Personal Data and payment information.

Our reasons - Fulfilling contractual obligations; with your consent (where required); legal obligations; our legitimate interests.

Our legitimate interests - Improving and developing new products and services; being more efficient; protect our systems, networks and staff; compliance with legal obligations.

We use your Personal Data for other general business purposes,

- such as maintaining your account, conducting internal or market research and measuring the effectiveness of advertising campaigns.
- We reserve the right, if you have Brenntag accounts, to reconcile those accounts into one single account. We also use your Personal Data for management and operation of our communications, IT and security systems.

Our reasons - Fulfilling contractual obligations; with your consent (where required); legal obligations; our legitimate interests.

Our legitimate interests - Improving and developing new products and services; being more efficient; protect our systems, networks and staff; compliance with legal obligations.

The data we use is stored by the web server and used by us to enable the use of the servers and its technical administration, to secure system security and to further optimize our online content.

We use the registration data (title, name, email address, company name) for the establishment and implementation of your account, membership, the creation of your account/ member account, the provision of our services and for contacting you, if and to the extent necessary for the aforementioned purposes.

Your data may be disclosed to our partner companies (such as our service providers, subcontractors, suppliers), credit reporting agencies/debt collectors, third party recipients using personal data for legal reason or due to merger/acquisition or affiliates (as defined below) to the extent we use them to provide support services in processing your data on our behalf. Your Personal Data will be processed by our authorised staff or agents, on a need to know basis, depending on the specific purposes for which your Personal Data have been collected (e.g. our staff in charge of customer service matters will have access to your customer record).

For this reason, we may transfer your personal data to other countries that may have different laws and data protection compliance requirements to those that apply in the country in which you are located.

We will only use processors that have committed to complying with data protection standards at least to the same degree that we have committed ourselves under the applicable data protection legislation.

We take appropriate measures to keep your Personal Data confidential and secure. We store your Personal Data in operating environments that use reasonable security measures to prevent unauthorised access and disclosure. We follow reasonable standards to protect Personal Data.

As soon as the purpose for the collection, use, disclosure or other processing of the personal data has ceased to exist and we have no legal or business purpose to retain the data, we will

delete this data without undue delay, unless there are legitimate reasons within the meaning of

the applicable statutory provisions, such as in particular statutory retention obligations, to archive such data. In this case, the data is blocked instead of deleted.

8. Legal Entitlement

The collection, use, disclosure and other processing of personal data as described in this data Privacy Procedure will only be conducted if and to the extent we are legally entitled or required to do or after the user has consented to the use for the described purpose.

9. Rights of Data Subject

You may have a right to be informed upon your collected personal data within Brenntag Israel's possession; free of charge as well as, a right to seek rectification of inaccurate data or limit the processing of your data. You may have rights to review update, port, be forgotten, erase, destroy, anonymize, restrict or object to certain activities, in which we engage with respect to your personal data You may also have the right to lodge a complaint with a data protection supervisory authority in your country, including the right to request information on the source of your Personal Data. You may withdraw your consent for the use or disclosure or processing of your data at any time with effect for the future. If you withdraw your consent, we may still be entitled to use and disclose your data where permitted or required by law.

If you have any questions regarding the collection, processing or use of your personal data or if you require to exercise any rights as set out in clause 4.1, please contact us using the details in. Please provide sufficient details to enable us to understand the nature of your request and how to contact you.

10. Your Rights

Brenntag Israel shall honor your rights in accordance with legal obligations and subject to the exemptions defined in applicable laws and regulations.

These rights are:

- Your right to access your Personal Data;
- Your right to correct or amend or update your Personal Data;
- Your right to be forgotten (right to erasure);
- Your right to obtain Personal Data in a portable form (right to data portability);
- Your right to restriction of processing, according to the regulation, and;
- Your right not to be subject to a decision based solely on automated processing, including profiling.
- Your right to withdraw your consent for future processing. This has no influence on the lawfulness of processing activities in the past.
- You have the right to object to processing of your personal data for purposes of direct marketing without stating reasons.

If we process your data on the basis of your consent, you can withdraw the consent at any time for future processing. If we process your personal data for the purposes of our legitimate interests, you may object to such processing for reasons arising from your particular situation. We will then no longer process your personal data, unless we can prove compelling reasons for processing worthy of protection. This might override your interests, rights and freedoms or the processing serves the enforcement, exercise or defense of legal claims.

These rights are not exhaustive and may depend on certain legal conditions and exceptions.

If you wish to exercise any of these rights, please contact the Group Data Protection Officer. We will respond to your request within 30 days after we received the request. You can find the contact details below. After we received the request, we will give you further instructions in order to verify your identity in an appropriate manner. We handle your personal data carefully and want to be certain that we are providing information to the right person.

Without prejudice to any other administrative or judicial remedy, every data subject shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work, or place of the alleged infringement if the data subject considers that the processing of personal data relating to him or her infringes the law.

Brenntag Israel only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal accounting or reporting requirements or due to other legal storage obligations or to defend possible legal claim.