

Privacy Statement

• Data protection declaration

Welcome to Nye Lubricants! We are very pleased that you are visiting our website, and thank you for your interest in our company, products, and websites. Data protection and data security when accessing our website are extremely important to us. We would therefore like to take this opportunity to inform you about the personal data relating to you that we capture when you visit our website and the purposes for which it is used. Please therefore take note of the information that follows.

As changes to the law or to our internal procedures may make it necessary to modify this data protection declaration, we would ask you to read through this data protection declaration regularly.

§ 1 Controller and scope of application

The controller, within the meaning of the General Data Protection Regulation (hereinafter referred to as the GDPR), California Consumer Protection Act (hereinafter referred to as CCPA) and other national data protection laws of member states as well as other data protection legislation, is:

NYE LUBRICANTS INC

12 Howland Road

Fairhaven, MA 02719 USA

Tel: +1 (508) 996-6721

Fax: +1 (508) 997-5285

Email: contact@nyelubricants.com

Website: <https://www.nyelubricants.com>

This data protection declaration covers the pages published on the internet by NYE

LUBRICANTS INC, which can be viewed on the domain <https://www.nyelubricants.com> as well as all sub-domains (hereinafter referred to as "our website").

§ 2 Data protection officer

The Nye Lubricants Inc data protection officer is:

Michael Starkey

12 Howland Road

1. Fairhaven, MA 02719 USA

2. privacy@nyelubricants.com

§ 3 Principles of data processing

Personal data is defined as all information which relates to an identified or identifiable natural person. This includes, for example, information such as your name, age, address, telephone number, date of birth, email address, IP address or your usage behavior. Information that does not allow us (or only allow with a disproportionate amount of effort) to connect the data to you as a person - e.g., through anonymizing the information - is not counted as personal data. The processing of personal data (e.g., collecting, accessing, using, saving or relaying personal data) must always have a basis in law, or your consent must have been obtained. Processed personal data is erased as soon as the purpose of the processing has been fulfilled and there are no statutory record-keeping obligations to be met.

You will find below information on the specific processes, scope and purpose of data processing, the legal basis for the processing and the length of time for which data will be stored for those cases where we process your personal data in order to be able to provide you with certain services.

§ 4 Individual processes involving data processing

1. Provision and usage of the website

a. Type and scope of data processing

When you access and use our website, we capture the data that your browser automatically transmits to our server. This data is temporarily stored in a so-called log file.

When you use our website, we capture the following data that we need for technical reasons in order to be able to show you our website and to ensure its stability and security; and which is also analyzed for statistical purposes only:

- IP address of the source computer
- Date and time of access
- Name and URL of the file accessed
- Website facilitating access (referrer URL)
- Pages or sub-domains visited
- Browser used and, where applicable, your computer's operating system and other technical characteristics used in displaying web data
- Access status (http status code)

b. Legal basis

The legal basis for the data processing referred to above is provided by Art. 6 (1) (f) GDPR. The processing of the data referred to above is required for the provision of a website and thus

necessary for the purposes of the legitimate interests pursued by our company.

c. Data storage duration

The log files created in conjunction with the usage of our website will be held for a period of 30 days, and subsequently erased. The capture of the data and its storage in log files is required for the operation of the internet pages and for ensuring the stability and quality of this service. Greater and/or longer storage of data may apply in individual cases, if this is stipulated in law, or for error correction or troubleshooting purposes.

2. Request form for Consultative Design

a. Type and scope of data processing

The request form is a form that is managed by our 3rd party data controller, ClickDimensions LLC. The data entered in the form is additionally relayed to NYE LUBRICANTS via email. This data is not stored on the web server. The email address used by you for your request is listed in our log files. When filling out the form, the user enters the following personal data in order to receive contact from the controller:

- Name
- Email

b. Legal basis

The basis for the processing of the personal data set out in the form is the declaration of consent shown below made by you of your own free will, as provided for in Art. 6(1)(a) of the GDPR:

Declaration of consent

I consent to my personal data being processed for the purpose of requesting consultation and/or design services. I have read and agree to the current data protection declaration. I can withdraw my consent at any time, which will affect future transactions, by clicking “unsubscribe” on received emails, or by contacting privacy@nyelubricants.com. You may withdraw your consent to the use of your personal data at any time by emailing the address given in section 1 above or by emailing the data protection officer (cf. section 2 above), which will affect future transactions.

c. Data storage duration

Your data will be stored for a period of seven (7) years from the date of last contact, unless you request deletion of your personal information per our policy.

3. Access form for Product Data Sheets, SDS, and other Product Documents

3. a. Type and scope of data processing

The request form is a form that is managed by our 3rd party data controller, ClickDimensions LLC. The data entered in the form is additionally relayed to NYE LUBRICANTS via email. This data is not stored on the web server. The email address used by you for your request is listed in our log files. When filling out the form, the user enters the following personal data in order to receive contact from the controller:

- Name
- Company
- Nye Product
- Comments or Questions
- Email
- “Receive News” checkbox

Legal basis

The basis for the processing of the personal data set out in the form is the declaration of consent shown below made by you of your own free will, as provided for in Art. 6(1)(a) of the GDPR:

Declaration of consent

I consent to my personal data being processed for the purpose of requesting documents and/or newsletter subscription(s). I have read and agree to the current data protection declaration. I can withdraw my consent at any time, which will affect future transactions, by using the “unsubscribe” link in emails received, or by contacting privacy@nyelubricants.com

4. You can withdraw your consent to the use of your personal data at any time by emailing the address given in section 1 above or by emailing the data protection officer (cf. section 2 above), which will affect future transactions.

c. Data storage duration

Your data will be stored for a period of seven (7) years from the date of last contact, unless you request deletion of your personal information per our policy.

4. Request form for News Updates and/or Newsletters

a. Type and scope of data processing

The request form is a form that is managed by our 3rd party data controller, ClickDimensions LLC. The data entered in the form is additionally relayed to NYE LUBRICANTS via email. This data is not stored on the web server. The email address used by you for your request is listed in our log

files. When filling out the form, the user enters the following personal data in order to receive contact from the controller:

- Name
- Email

b. Legal basis

The basis for the processing of the personal data set out in the form is the declaration of consent shown below made by you of your own free will, as provided for in Art. 6(1)(a) of the GDPR:

Declaration of consent

I consent to my personal data being processed for the purpose of requesting consultation and/or design services. I have read and agree to the current data protection declaration. I can withdraw my consent at any time, which will affect future transactions, by clicking “unsubscribe” in received emails, or by contacting privacy@nyelubricants.com

You can withdraw your consent to the use of your personal data at any time by emailing the address given in section 1 above or by emailing the data protection officer (cf. section 2 above), which will affect future transactions.

c. Data storage duration

Your data will be stored for a period of seven (7) years from the date of last contact, unless you request deletion of your personal information per our policy.

§ 5 Sharing of data with third parties

We only share your personal data with third parties if:

- You have given your express permission for us to do so, in accordance with Art. 6 (1) sent. 1 lit. a GDPR
- In accordance with Art. 6 (1) sent. 1 lit. c GDPR there is a legal obligation to do so
- This is legally permissible and in accordance with Art. 6 (1) sent. 1 lit. b GDPR necessary for the performance of our contact with you
- In accordance with Art. 6 (1) sent. 1 lit. f GDPR the sharing of your data is necessary to safeguard a justified company interest on the part of NYE LUBRICANTS INC and there are no grounds for assuming you have an overriding right not to have your data shared with a third party, which is worthy of protection
- In accordance with Art. 6 (1) sent. 1 lit. f GDPR the sharing of your data is necessary to

assert, exercise or defend a legal entitlement and there are no grounds for assuming you have an overriding right not to have your data shared with a third party, which is worthy of protection

§ 6 Usage of cookies

For detailed information on the use of cookies on our website, see our Cookie Policy.

§ 7 Plug-ins

1. Facebook, LinkedIn, YouTube

Our websites contain plug-ins for “Facebook” (Meta Inc., 1601 S. California Ave, Palo Alto, California 94304, USA) and “LinkedIn” (LinkedIn Headquarters 2029 Stierlin Ct. Ste. 200 Mountain View, CA 94043) social networks, as well as “YouTube” (Google LLC, 1600 Amphitheater Parkway, Mountain View CA 94043, USA) for embedded video presentation. It is possible that personal data on website visitors may be collected through these plug-ins and relayed and linked to the service in question.

NYE LUBRICANTS INC itself does not collect any personal data through the plug-ins or the usage thereof. If you click on one of the plug-in graphics, data may be relayed to, and stored by, the providers in question. If you do not click on one of the graphics there will be no data transmitted between you and the provider of the relevant plug-in.

Once you have clicked on a plug-in, the provider in question will receive the information that you have visited the relevant page on our website. Please be aware that you do not have to have a user account for the service in question nor do you already need to be logged in for this to happen. Should you have a user account with the service provider in question, and already be logged in when visiting our website, the data collected by the plug-in will be directly linked to your account. If you do not want to have the data linked to your profile with the service provider, you must log out of your user account before clicking on a plug-in.

Please be aware that NYE LUBRICANTS INC has no influence on whether, and to what extent, the service providers in question collect personal data. We do not know or guarantee in any way the scope, purpose or storage duration of the data collected.

Please read the data protection notifications directly on the websites of the services in question to establish the scope and purpose of each service’s data collection activities as well as how your data is further processed and used. You will also find information on your relevant data protection rights and on settings options to protect your privacy there.

Meta Inc., 1601 S California Ave, Palo Alto, California 94304, USA

<https://www.facebook.com/policy.php>

<https://www.facebook.com/help/186325668085084>

LinkedIn Inc., LinkedIn Headquarters 2029 Stierlin Ct. Ste. 200 Mountain View, CA 94043 USA

<https://www.linkedin.com/legal/privacy-policy>

Google LLC, 1600 Amphitheater Parkway, Mountain View CA 94043, USA

<https://policies.google.com/>

§ 8 Hyperlinks

On our website there are so-called hyperlinks to the websites of other providers. If you activate these hyperlinks you will be taken from our website directly to the website of the other providers. This can be seen from the change in URL, amongst other factors. NYE LUBRICANTS INC has no influence on the content or design of these other providers' web pages. Understandably, therefore, the assurances made in this data protection declaration do not apply to the providers' web pages. Please inform yourself of the treatment of your personal data by these organizations by visiting their websites directly.

§ 9 Rights of data subjects

If you are a citizen or resident of the European Union, the GDPR has provided for you, as a data subject, to have the following rights in respect of the processing of personal data:

- Art. 15 GDPR provides for you to demand information on the personal data we process in relation to you. In particular, you can demand information on the purposes for which we process data relating to you; the categories of personal data; the categories of recipients to whom your data has been or will be presented; the scheduled duration of data storage; the existence of a right to rectification, erasure, restriction of the processing or to object to processing; the existence of a right to complain; the source of the data on you if it has not been collected by us; whether the data is to be transferred to a third country or international organizations; and whether data is selected on the basis of an automated decision-making process or profiling, with meaningful information on the details of this process, where applicable.
- Art. 16 GDPR provides for you to demand the immediate rectification or supplementing of your personal data held by us.
- Art. 17 GDPR provides for you to demand the erasure of your personal data held by us, provided the processing thereof is not required to exercise the right to freedom of expression and information, to meet a legal obligation, for public interest reasons or to assert, exercise or defend legal claims.
- Art. 18 GDPR provides for you to demand the restriction of processing of your personal data where you dispute the accuracy of the data; the processing is unlawful; or we no longer require

the data, but you oppose its erasure because you need it to assert, exercise or defend legal claims. You are also entitled to the right provided for in Art. 18 GDPR if you object to the processing in accordance with Art. 21 GDPR.

- Art. 20 GDPR provides for you to demand to receive, in a structured, current and machine-readable format, the personal data you have provided to us; or you can demand that it is relayed to another controller.
- Art. 7 (3) GDPR provides for you to withdraw the consent you gave us at any time. The consequence of this is that we may in future no longer continue with the data processing dependent on this consent.
- Art. 77 GDPR gives you the right to complain to a supervisory authority. As a US Company, Nye Lubricants voluntarily complies with privacy regulations, including GDPR.

§ 10 The right to object

Where your personal data is processed on the basis of legitimate interests, Art. 6 (1) sent. 1 lit. f GDPR provides for you, in accordance with Art. 21 GDPR, to object to the processing of your personal data, where there are grounds for so doing based on your own particular situation, or your objection is to direct marketing. In the case of direct marketing, you have a general right to object, which we must implement without the need for stating the existence of a particular situation.

§ 11 Data security and backup measures

We undertake to protect your privacy and to treat your personal data with the utmost confidentiality. In order to avoid the manipulation, loss or misuse of the personal data we have stored that relates to you, we have adopted extensive technical and organizational security measures which are routinely checked and updated in line with improvements in technology. These include the use of recognized encryption methods (SSL or TLS). We must, however, point out that, due to the structure of the internet, it is possible that the data protection rules, and abovementioned security measures, may not be observed by other persons or institutions who/which do not come under our scope of responsibility. In particular, unencrypted data - e.g., if sent in an email - could be read by third parties. We have no technical influence on this. It is the user's responsibility to protect the data provided to him/her against misuse, through encryption or some other method.

If you have any queries, please do not hesitate to contact us at one of the addresses listed in section 1.