

EASTMAN CHEMICAL COMPANY
FAIR PROCESSING NOTICE

1. What is this document and why should you read it?

This fair processing notice explains how and why **Eastman Chemical Company** including each of its operating entities (also referred to as "**Eastman**", "**we**", "**our**" and "**us**") uses personal data about those individuals who purchase goods or services from us, supplies goods or services to us, visits our website at www.eastman.com (the "**Website**"), or otherwise communicates or engages with us (referred to as "**you**").

You should read this notice, so that you know what we are doing with your personal data. Please also read any other privacy notices that we give to you, that might apply to our use of your personal data in specific circumstances in the future.

2. Eastman's data protection responsibilities

"**Personal data**" is any information that relates to an identifiable natural person. Your name, address and contact details are all examples of your personal data, if they identify you.

The term "**process**" means any activity relating to personal data, including, by way of example, collection, storage, use, consultation and transmission.

Eastman is a so-called "**controller**" of your personal data. This means that we make decisions about how and why we process your personal data and, because of this, we are responsible for making sure it is used in accordance with data protection laws.

3. What types of personal data do we collect and where do we get it from?

We collect different types of personal data about you when you visit our Website, purchase something from us or otherwise communicate or engage with us. We also obtain some personal data from other sources, and create some personal data ourselves.

If any of the personal information you have given to us changes, such as your contact details, please inform us without delay by

- (a) Employees, go to Benefits, Health, and Money on MyEastman (US Only) or contact your local Human Resource representative;
- (b) Customers, contact your customer service representative or account manager;
- (c) Suppliers, contact your purchasing representatives.

You can also inform us by contacting the Chief Privacy Office at privacy@eastman.com.

We collect your personal information from various sources. The table below sets out the different types of personal information that we collect and the sources we collect it from.

Category	Type of personal data	Collected from
Contact Information	<ul style="list-style-type: none"> Name Address Telephone number Email address Organization details (e.g. your place of work, job title and organization contact information) Your marketing preferences 	<ul style="list-style-type: none"> You
Background and Identity Check Information	<ul style="list-style-type: none"> Contact Information (see above) Date of birth Passport Proof of address Tax ID Curriculum Vitae (CV) or resume Nationality 	<ul style="list-style-type: none"> You Third-party systems used for our identity checks
Customer/Supplier Information	<ul style="list-style-type: none"> Contact Information (see above) Individual Reference Number Digital signature Order information for goods and services purchased or sold by you (or your organization) Payment information You/your organization's banking details Fraud checks or flags raised about your transactions, payment card refusals Delivery details Communications we may have with you, whether relating to a transaction or not (please note that we record calls to our customer services team) Any additional information that you provide to us voluntarily or for account security, including (for example) date of birth or mother's maiden name Responses to surveys or competition entries Sensitive Information (see sub-categories below) 	<ul style="list-style-type: none"> You Third-party fraud checking service Your/your organization's bank
Website Information	<ul style="list-style-type: none"> Contact Information (see above) IP address and other online identifiers/web beacons User names and other log-in information Details of your online browsing activities on our Website, such as the pages, products or areas of our Website that you visit Your account settings including any default preferences, any preferences we have observed, such as the types of offers that interest you, or the areas of our Website that you visit 	<ul style="list-style-type: none"> Device used to access the Website Our Website
Sensitive Information	<ul style="list-style-type: none"> Racial or ethnic origin (including your nationality and passport information) Information relating to actual or suspected criminal convictions and offences (pursuant to anti-money laundering and identity checks) 	<ul style="list-style-type: none"> You Third-party systems used for our identity checks

4. What do we do with your personal data and why?

We process your personal data for particular purposes in connection with your use of the Website, the provision of services or goods from us to you (or vice versa), your communication or other engagement with us and the management and administration of our business.

We are required by law to always have a so-called "lawful basis" (i.e. a reason or justification) for processing your personal data. The table below sets out the purposes for which we process your personal data and the relevant lawful basis on which we rely for that processing.

Please note that where we have indicated in the table that our processing of your personal data is either:

(a) necessary for us to comply with a legal obligation; or

(b) necessary for us to take steps, at your request, to potentially enter into a contract with you, or to perform it,

if you choose not to provide the relevant personal data to us, we may not be able to enter into or continue our contract or engagement with you.

	Purposes of processing	Lawful basis			
		Your consent	To perform a contract with you	To comply with a legal obligation	For our legitimate interests
Contact Information					
a)	Responding to your enquiries and/or complaints		✓		✓ (It's important that we can respond to you in relation to such matters)
b)	Confirming and processing orders for goods or services that you may make with us (either as customer or supplier)		✓		
c)	Sending you information (including direct marketing) as set out in the section "How do we communicate with you?", below	✓			✓ (It is important to keep you updated of orders made with us and notified of factual updates to our engagement with you)
Background and Identity Check Information					
d)	Performing anti-bribery, anti-corruption, and trade and export risk			✓	✓ (We need to ensure compliance with regulatory requirements)
e)	Performing identity and credit checks			✓	✓ (We need to ensure that the identity and credit worthiness of our customers/suppliers is verified)
Website Information					
f)	Ensure the operation and performance of the Website (Please also see the Cookies section below)				✓ (We need to ensure the Website functions correctly)
g)	To improve the functionality of the Website				✓ (It is in our interest to keep the Website up to date and improve its functionality for the benefit of users)
h)	To enable you to create accounts and log-in to them via the Website		✓		✓ (It is in our interests to grant you access to a private log-in where you can access information relevant to you and your investment)
i)	To use targeted cookies in relation to advertising	✓			✓ (We need to ensure accurate and relevant content for the benefit of users)

	Purposes of processing	Lawful basis			
		Your consent	To perform a contract with you	To comply with a legal obligation	For our legitimate interests
Customer/Supplier Information					
j)	To take payment and deliver your goods to you or the recipient you indicate, to deal with any complaints or any after sales services, including for warranty purposes		✓		
k)	To make payments and receive goods from you, to deal with any complaints or any after sales services, including for warranty purposes		✓		
l)	To protect customers, suppliers, and our business from fraud to minimize the risk of false details being used, and abuse of card details by fraudsters		✓		✓ (It is important that we seek to limit incidents of fraud)
All categories					
m)	Establishing and enforcing our legal rights and obligations and monitoring to identify and record fraudulent activity			✓	
n)	Complying with instructions from law enforcement agencies, any court or otherwise as required by law			✓	
o)	For our general record-keeping and customer/supplier relationship management		✓		✓ (We need to store customer/supplier related information so we can refer to it)
p)	Managing the proposed sale, restructuring or merging of any or all part(s) of our business, including to respond to queries from the prospective buyer or merging organization			✓	✓ (We have a legitimate interest in being able to sell any part of our business)
q)	To keep records required by law or to evidence our compliance with laws, including tax laws, consumer protection laws and data protection laws			✓	
r)	Resolving any complaints from or disputes with you		✓		✓ (We need to be able to try and resolve any complaint or dispute you might raise with us)

We may also convert your personal data into statistical or aggregated form to better protect your privacy, or so that you are not identified or identifiable from it. Anonymised data cannot be linked back to you. We may use it to conduct research and analysis, including to produce statistical research and reports. For example, to help us understand and improve the use of our Website.

5. **Sensitive Information**

Some of the processing described in the above table will include the processing of 'special categories of personal data' and/or sensitive personal data (together, "**Sensitive Information**" – as set out in the table at **paragraph 3**, above). This refers to sensitive or special categories of personal data which we are required to process with more care, according to applicable laws.

The table below sets out the different purposes for which we process your Sensitive Information and the relevant lawful basis on which we rely for that processing. For some processing activities, we consider that more than one lawful basis may be relevant – depending on the circumstances.

Purposes of processing	Sensitive Information - lawful basis			
	You have given your explicit consent to the processing	It is necessary to protect somebody's vital interests or they are incapable of giving consent	It is necessary for the establishment, exercise or defence of legal claims	It is necessary for reasons of substantial public interest
Performing anti-bribery, anti-corruption, and trade and export risk checks	✓		✓	
Performing identity and credit checks	✓		✓	

6. **Who do we share your personal data with, and why?**

Sometimes we need to disclose your personal data to other people.

Inside Eastman's Group:

We are part of the Eastman group, which includes a number of companies and operations globally. Therefore, we will need to share your personal data with other companies in the Eastman group for our general business management purposes and, in some cases, to meet our customer needs where providing services across branches/locations and/or for authorisations/approvals with relevant decision makers, reporting and where systems and services are provided on a shared basis.

Access rights between members of the Eastman group are limited and granted only on a need to know basis, depending on job functions and roles.

Where any Eastman group companies process your personal data on our behalf (as our processor), we will make sure that they have appropriate security standards in place to make sure your personal data is protected.

Outside Eastman's Group:

From time to time we may ask third parties to carry out certain business functions for us, such as the administration of our Website and IT support. These third parties will process your personal data on our behalf (as our processor). We will disclose your personal data to these parties so that they can perform those functions. Before we disclose your personal data to these third parties, we will seek to ensure that they have appropriate security standards in place to protect your personal data. Examples of these third-party service providers include our outsourced IT systems software and maintenance, back up, and server hosting providers.

In certain circumstances, we will also disclose your personal data to third parties who will receive it as controllers of your personal data in their own right for the purposes set out above, where the relevant disclosure is in relation to:

- a) services provided to you or us by a third party acting independently to Eastman but which has a relationship with Eastman, for example certain payment fraud checking services;
- b) the purchase or sale of our business (or part of it) in connection with a share or asset sale, for which we may disclose or transfer your personal data to the prospective seller or buyer and their advisors; and
- c) the disclosure of your personal data in order to comply with a legal obligation, to enforce a contract or to protect the rights, property or safety of our employees, customers or others.

We have set out below a list of the categories of recipients with whom we are likely to share your personal data:

- a) IT support, Website and data hosting providers and administrators;
- b) payment processors in relation to purchases you make with us;
- c) consultants and professional advisors including legal advisors and accountants;
- d) courts, court-appointed persons/entities, receivers and liquidators;
- e) business partners and joint ventures;
- f) insurers; and
- g) governmental departments, statutory and regulatory bodies.

7. Where in the world is your personal data transferred to?

As part of a global organization, Eastman may transfer your personal data to recipients (either internally or externally, as set out above) that are established in jurisdictions other than your own. Please be aware that the data protection laws in some jurisdictions may not provide the same level of protection to your personal data as is provided to it under the laws in your jurisdiction.

If any disclosures of personal data referred to above requires your personal data to be transferred, we will only make that transfer if:

- a) the country to which the personal data is to be transferred ensures an adequate level of protection for personal data;
- b) we have put in place appropriate safeguards to protect your personal data, such as an appropriate contract with the recipient;
- c) the transfer is necessary for one of the reasons specified in data protection legislation, such as the performance of a contract between us and you; or
- d) you explicitly consent to the transfer.

8. How do we keep your personal data secure?

We will take specific steps (as required by applicable data protection laws) to ensure we take appropriate security measures to protect your personal data from unlawful or unauthorized processing and accidental loss, destruction or damage.

9. How long do we keep your personal data for?

We will only retain your personal data for a limited period of time and for no longer than is necessary for the purposes for which we are processing it for. This will depend on a number of factors, including:

- a) any laws or regulations that we are required to follow;
- b) whether we are in a legal or other type of dispute with each other or any third party;
- c) the type of information that we hold about you; and
- d) whether we are asked by you or a regulatory authority to keep your personal data for a valid reason.

10. How do we communicate with you?

We will use your personal data to communicate with you:

- a) in relation to any purchases you make with us;
- b) to administer our relationship with you;
- c) to respond to any questions or complaints that you may have; and
- d) to invite you to take part in market research or request feedback on our products and services.

From time to time and with your opt-in consent (if required), we will provide you with information about our products, services, promotions and/or offers which may be of interest to you. Such communications will be sent either by email, text, post or telephone.

If you do not wish to receive such communications, you can opt-out at any time by either following the instructions within the communication or contacting

- a) Employees, go to Benefits, Health, and Money on MyEastman (US Only) or contact your local Human Resource representative;
- b) Customers, contact your customer service representative or account manager;
- c) Suppliers, contact your purchasing representatives.

You can also inform us by contacting the Chief Privacy Office at privacy@eastman.com.

11. Cookies

When you visit the Website, we generate one or more "cookies", which we deploy with your consent (if required).

If you do not agree to our use of cookies, you should set your browser settings accordingly or not use the Website. Please be aware that if you disable the cookies that we use, this may impact your user experience while using the Website.

The table below summarizes the different types of cookies we use on the Website, together with their respective purpose and duration (i.e. how long each cookie will remain on your device).

Two types of cookies may be used on the Website - "session cookies" and "persistent cookies". Session cookies are temporary cookies that remain on your device until you leave the Website. A persistent cookie remains on your device for much longer or until you manually delete it (how long the cookie remains on your device will depend on the duration or "lifetime" of the specific cookie and your browser settings).

Cookies used on the Website:

Type of Cookie	What do they do?	Do these cookies collect my personal data/identify me?
Necessary	Cookies that are essential to making the Website work correctly. They enable visitors to move around our Website and use our features. Examples include remembering previous actions (e.g. entered text) when navigating back to a page in the same session.	These cookies do not identify you as an individual. If you do not accept these cookies, it may affect the performance of our Website.
Performance	Cookies that help us understand how visitors interact with our web properties by providing information about the areas visited, the time spent on the Website and any issues encountered, such as error messages. They help us improve the performance of our Websites, alert of any concerns and more.	These cookies don't identify you as an individual. All data is collected and aggregated anonymously.
Functionality	Cookies that allow our web properties to remember the choices you make (such as your user name, interests, demographics, and web behavior on our sites) to provide a more personalized online experience.	The information these cookies collect may include personally identifiable information that you have disclosed, such as a username, for example. We shall always be transparent with you about what information we collect, what we do with it and with whom we share it. If you do not accept these cookies, it may affect Website performance and functionality and may restrict access to web content.

What are Cookies?

Cookies are files or pieces of information that may be stored on your computer (or other internet-enabled devices, such as a smartphone or tablet) when you visit the Website. A cookie will usually contain the name of the website from which the cookie has come from, the "lifetime" of the cookie (i.e. how long it will remain on your device) and a value, which is usually a randomly generated unique number.

We use cookies to make the Website easier to use and to better tailor our web presence and products to your interests and needs. Cookies may also be used to help speed up your future activities and experience on the Website. We also use cookies to compile anonymous, aggregated statistics that allow us to understand how people use our web properties and to help us improve web structure and content. We cannot identify you personally from this information.

Most internet browsers are initially set up to automatically accept cookies. You can change the settings to block cookies or to alert you when cookies are being sent to your device. There are a number of ways to manage cookies. Please refer to your browser instructions or help screen to learn more about how to adjust or modify your browser settings.

If you disable the cookies that we use, this may impact your experience while on the Website. For example, you may not be able to visit certain areas of the Website.

If you use different devices to view and access the Website (e.g. your computer, smartphone, tablet etc.), you will need to ensure that each browser on each device is adjusted to suit your cookie preferences.

12. What are your rights in relation to your personal data and how can you exercise them?

Where our processing of your personal data is based on your **consent** (please see the tables above), you have the right to withdraw your consent at any time. If you do decide to withdraw your consent we will stop processing your personal data for that purpose, unless there is another lawful basis we can rely on – in which case, we will let you know.

Where our processing of your personal data is based on the **legitimate interests** (please see the tables above), you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.

Where we are processing your personal data for **direct marketing** purposes, you have the right to object to that processing.

You have the right to (subject to applicable laws and certain limitations):

- a) access your personal data and to be provided with certain information in relation to it, such as the purpose for which it is processed, the persons to whom it is disclosed and the period for which it will be stored;
- b) require us to correct any inaccuracies in your personal data without undue delay;
- c) require us to erase your personal data;
- d) require us to restrict processing of your personal data;
- e) receive the personal data which you have provided to us, in a machine readable format, where we are processing it on the basis of your consent or because it is necessary for your contract with us (please see the tables above) and where the processing is automated.

13. Updates to this notice

We may update this notice from time to time to reflect changes to the type of personal data that we process and/or the way in which it is processed. We encourage you to check this notice on a regular basis.

14. Where can you find out more?

If you want more information about any of the subjects covered in this privacy notice or if you would like to discuss any issues or concerns with us, you can contact the Chief Privacy Office at privacy@eastman.com.