

Data Protection Policy

Sovereign Chemical refers to our commitment to treat information of employees, customers, stakeholders and other interested parties with the utmost care and confidentiality. With this policy, we ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights.

Scope

This policy refers to all parties (employees, job candidates, customers, suppliers etc.) who provide any amount of information to us.

Employees of our company and its subsidiaries must follow this policy. Contractors, consultants, partners, and any other external entities are also covered. Generally, our policy refers to anyone we collaborate with or acts on our behalf and may need occasional access to data.

Policy elements

As part of our operations, we need to obtain and process information. This information includes any offline or online data that makes a person identifiable such as names, addresses, usernames and passwords, digital footprints, photographs, social security numbers, financial data etc.

Our company collects this information in a transparent way and only with the full cooperation and knowledge of interested parties. Once this information is available to us, the following rules apply.

Our data will be:

- Accurate and kept up-to-date
- Collected fairly and for lawful purposes only
- Processed by the company within its legal and moral boundaries
- Protected against any unauthorized or illegal access by internal or external parties

Our data will not be:

- Communicated informally
- Transferred to organizations, states or countries that do not have adequate data protection practices and policies in place.
- Distributed to any party other than the ones agreed upon by the data's owner (exempting legitimate requests from law enforcement authorities)

In addition to ways of handling the data, the company has direct obligations towards people to whom the data belongs and Sovereign will not collect personal data outside of business contacts.



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To exercise data protection, procedures are outlined in our Employee Manual. Included, but not limited to the following:

- Restrict and monitor access to sensitive data. Access to the Cloud Network is secure and restricted to the appropriate job functions.
- Employees are trained in online privacy and security measures. All employees sign a confidentiality and nondisclosure agreement upon employment.
- Continually secure networks to protect online data from cyberattacks. Email, ERP Software, and the Cloud Network are protected behind firewalls and data is simultaneously backed up and monitored.
- Maintain clear procedures for reporting privacy breaches or data misuse either directly to management or report anonymously.
- Maintain data protection practices (2 step verification, document shredding, secure locks, data encryption, access authorization etc.)

Public access to this document can be found at www.sovchem.net/corporatesocialresponsibility/

For questions or to report any problems, concerns, or issues, please contact our Chief Executive Officer, Sam DiPaola III at sd3@sovchem.net. This can be sent anonymously at <https://anonymousemail.me/>

Sincerely,

Samuel J. DiPaola III

A handwritten signature in black ink, appearing to read "Samuel J. DiPaola III", with a stylized flourish at the end.

Chief Executive Officer

Reviewed and Revised: April 5, 2023