

## **Privacy Policy** ICL Services Privacy Policy

IMPORTANT: BY USING THE ICL SERVICES (AS DEFINED BELOW AND IN THE ICL TERMS AND CONDITIONS OF USE, TOGETHER WITH WHICH THIS PRIVACY POLICY SHOULD BE READ) YOU GIVE YOUR CONSENT THAT ALL PERSONAL DATA THAT YOU SUBMIT MAY BE PROCESSED BY ICL IN THE MANNER AND FOR THE PURPOSES DESCRIBED IN THE FOLLOWING PRIVACY POLICY.

IF YOU DO NOT AGREE TO THESE TERMS AND CONDITIONS SET FORTH HEREIN DO NOT USE THE ICL ON-LINE SERVICE.

At Israel Chemicals Ltd. ("**ICL**"), we recognize that privacy is important. This Policy applies to all of the software, services, information, tools, features and functionality located on the Site/s offered by ICL or its subsidiaries or affiliated companies (collectively, the "**Services**") and covers how personal and other information that ICL collects and receives, including information related to use of the Services, is treated. Any capitalized terms not defined herein shall bear the meaning ascribed to them in the ICL Terms and Conditions of Use. If you have any questions about this Policy, please feel free to contact us at: dataprivacy@icl-group.com.

Information We Collect and How We Use It:

ICL will not sell, auction off or give away your personal information to any thirdparty or other organization without first obtaining your prior written consent. In order to provide our Services, we may collect the following types of information:

• **Information You Provide** – When you visit the Site and register to ICL's Services we may require you to provide contact information including without limitation: full name, email address, company name and country of origin.

- Personal Information We process your personal information only for specific and limited purposes you consented to, including the provision of the Services. We ask only for data that is adequate, relevant and not excessive for those purposes. Some of these purposes may include to inform you of new services we will be providing, to send you requested product information and promotional material, for marketing purposes and market research, and internally to help us improve our Services and to help resolve any problems.
- **User Information** When you use our Services, we may automatically receive and record information from your computer, documents and browser, software and hardware attributes.
- **Anonymous Data Collected Through the Site** In addition to the information we collect as described above, we may use technology to collect anonymous information about the use of the Site. For example, ICL's Web server may automatically log which pages of the Site our visitors view and which Web browsers the Site's visitors use. This technology does not identify you personally, it simply enables ICL to compile statistics about the Site's visitors and their use of our Services. The Site contains hyperlinks to other pages on ICL's Web site. ICL may use technology to track how often these links are used and which pages on the Site our visitors choose to view. Again this technology does not identify you personally it simply enables ICL to compile statistics about the use of these hyperlinks.
- Such information can be collected via "cookies" or similar techniques. These "cookies" shall only be stored when you have provided us with your consent by clicking on the appropriate button(s) during your visit of our Site. You may opt out of the use of cookies at any time by re-entering the Site and selecting the correct options of your web browser. By changing settings, you can also determine that your browser will not accept cookies from this Site. Be aware that in such event, you may no longer be able to use all the functionalities and features of our Site.
- **User Communications** When you send email or other communication to ICL, We may retain those communications in order to process your inquiries, respond to your requests and improve our Services.
- **Links** Links to other sites may be provided by ICL as a convenience to our customers. ICL is not responsible for the privacy practices of other sites. This privacy statement applies solely to information collected by ICL.
- **Children** If you are a child under the age of 18 (or if you are a child, residing in the European Union, under the age of 16), you must obtain parental consent prior to using our Service. ICL will not knowingly contact or engage with children under this age without said parental consent. If you have reason to believe that a child has provided us with their personal information, please contact us at the

address given above and we will endeavor to delete that information from our databases.

- **Maintenance** ICL uses the information that you provide or that we collect to operate, maintain, enhance, and provide all of the features and services found on the Site.
- eMail By actively subscribing with www.icl-group.com, you understand that we
  may send you communications or data from <u>contact@icl-group.com</u> regarding
  the Services, including but not limited to (i) notices about your use of the
  Services, including any notices concerning violations of use, (ii) updates, and (iii)
  promotional information and materials regarding ICL's products and services, via
  electronic mail. We give you the opportunity to opt-out of receiving electronic
  mail from ICL by clicking on the "unsubscribe" link in the electronic mail sent to
  you or by sending an electronic mail to: <u>contact@icl-group.com</u>.
- **Analysis** ICL uses all the information that we collect to understand the usage trends and preferences of our users, to improve the way the Site works and looks, and to create new features and functionality. Currently we are using Google Analytics for the above. No personal information is collected from Google Analytics. For further information on the privacy policy concerning Google Analytics, please visit: www.google.com/analytics/learn/privacy.html.

Sensitive Information & Information about Third Parties:

You may not post, transmit or publish through the Services any information about third parties without having their explicit consent. You may not post, transmit or publish through the Services any sensitive information, whether the information is yours or another's Choices for Personal Information: When you subscribe to Services we ask you to provide contact information. If we use this information in a manner different than the purpose of the Services or the purpose to which you consented, then we will ask for your consent prior to such use. We will not collect or use information for purposes other than those described in this Policy and/or in relevant agreements, unless we have obtained your prior consent.

You can decline to submit personal information, in which case ICL may not be able to provide you with some of the Services.

## Information sharing:

ICL only shares personal information with other companies or individuals in the following limited circumstances:

• We have your consent.

- We provide such information to our subsidiaries, affiliated companies, services providers that perform functions on our behalf such as webhosting and monitoring or other trusted businesses or persons for the purpose of processing personal information on our behalf. We require that these parties agree to process such information based on our instructions and in compliance with this Policy and that they shall take all the required measures to safeguard the confidentiality and security of the personal information. We will only provide such parties access to the personal information for the purpose of and to the extent needed to perform their services on our behalf. We require such parties not to use or store the personal information for any other purpose.
- We have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to (a) satisfy any applicable law, regulation, legal process or enforceable governmental request, (b) enforce applicable agreements and/or their terms, including investigation of potential violations thereof, (c) detect, prevent, or otherwise address fraud, security or technical issues, or (d) protect against imminent harm to the rights, property or safety of ICL, its users or the public as required or permitted by law.
- If we become involved in a merger, acquisition, or any form of sale of some or all of our assets, we will provide notice before personal information is transferred and becomes subject to a different privacy policy.
- If we obtain assurances from our agents that they will safeguard personal information through measures consistent with this Privacy Policy. Where we have knowledge that an agent is using or disclosing personal information in a manner contrary to this Privacy Policy, we take commercially reasonable steps to prevent or stop the unauthorized use or disclosure.

If you have any questions about the management or use of personal data, please contact us through the e-mail address featured above.

Information security:

- We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data.
- We strive to maintain the reliability, accuracy, completeness and currency of personal information that we collect and to protect the privacy and security of our customers. We keep your personal information only for as long as reasonably necessary for the purposes for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements.
- We limit access to personal information about you to employees, contractors and agents who we believe reasonably need to come into contact with that information. These individuals are bound by confidentiality obligations and may

be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

- Our website is protected according to relevant best practices to safeguard your personal information. At ICL we take to the extent possible based on reasonable effort relevant and acceptable security measures to ensure the safe keeping of personal information.
- Although we cannot guarantee against any loss, misuse, unauthorized disclosure, alteration or destruction of data, we try to prevent such unfortunate occurrences.
- If you have any questions about information security or the protection of personal data, please contact us through the e-mail address featured above.

Data integrity, accessing and updating personal information:

- ICL processes personal information only for the purposes for which it was collected and in accordance with this Policy or any applicable service agreements. We review our data collection, storage and processing practices to ensure that we only collect, store and process the personal information needed to provide or improve our Services. We take reasonable steps to ensure that the personal information we process is accurate, complete, and current, but we depend on our users to update or correct their personal information whenever necessary.
- Upon receipt of your written request and enough information to permit us to identify your personal information, we will disclose to you the information we hold about you. Upon your written request, we will also: correct, amend or delete any personal information that is inaccurate and notify any third party recipients of the necessary changes. You can also request to delete or object to further processing of your personal information.
- We do not charge for complying with a correction request, however, for all other requests, we may charge a small fee to cover its costs. Requests to delete personal information are not absolute. For example, ICL is subject to any applicable legal and ethical reporting or document retention obligations imposed on ICL or ICL may retain such information to establish, exercise or defend ourselves against a legal claim.
- We ask individual users to identify themselves and the information requested to be accessed, corrected or removed before processing such requests, and we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, or would be extremely impractical, or for which access is not otherwise required.
   Please contact us at the above address for any additional questions or to access and update personal information.

Enforcement:

• ICL regularly reviews its compliance with this Policy. Please feel free to direct any questions or concerns regarding this Policy or our treatment of personal information by contacting us as provided above. When we receive formal written complaints it is ICL's policy to contact the complaining user regarding his or her concerns. We will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal information that cannot be resolved between ICL and an individual.

Changes to this Privacy Policy:

• ICL may update this policy. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address you submitted upon subscribing or by placing a prominent notice on our site.

Consent to Processing:

• By actively providing any personally identifiable information to us pursuant to this Privacy Policy, all users, including, without limitation, users in the United States, Israel and member states of the European Union, fully understand and unambiguously consent to this Privacy Policy and to the collection and processing of such information. Such consent may subsequently be withdrawn, which will take effect following the receipt of such withdrawal. The server on which the Site is hosted and/or through which the Services are processed may be located outside the country from which you access the Site and may be outside your country of residence and as such a different data privacy regime may apply. Some of the uses and disclosures mentioned in this Privacy Policy may involve the transfer of your Personal Identifiable Information to various countries around the world that may have different levels of privacy protection than your country. By submitting your Personal identifiable information through the Site and as part of the Services, you consent, acknowledge, and agree that we may collect, use, transfer, and disclose your personally identifiable information as described in this Privacy Policy. If you do not consent to the terms of this Privacy Policy, please do not use this Site.

Questions:

If you have any questions about this Privacy Policy or concerns about the way we process your personal information, please contact us at <u>dataprivacy@icl-</u><u>group.com</u>.