

## Privacy Policy

Ecovyst Inc., including its affiliates and subsidiaries, (collectively “**Ecovyst Inc.**” or “**Ecovyst**” or “**we/our**”) is committed to protecting your privacy. The purpose of this Privacy Policy (“**Policy**”) is to notify you of the types of personal information that we may collect from you or that you may provide to Ecovyst Inc. and the practices that will govern the processing of such personal information.

Please read this Policy carefully to understand Ecovyst Inc.’s policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, it is your choice not to use our website(s) ([www.Ecovyst.com](http://www.Ecovyst.com) or “**Website**”) or not to provide your information to Ecovyst Inc. By accessing and using the Website or otherwise providing your personal information to Ecovyst Inc., you agree to this Policy and consent to the personal information collection, use, and disclosure practices described herein. This Policy may change from time to time, your continued use of Ecovyst Inc.’s Website or services after we make changes is deemed to be acceptance of those changes. Please check the Policy periodically for updates.

### **Scope**

This Policy applies to personal information that is collected from customers, employees, Website visitors, and job applicants through Ecovyst Inc.’s Website or other electronic means.

This Policy does not apply to personal information collected by any third party, including through any application or content (including advertising) that may link to or be accessible from or on our Website.

### **Information We Collect**

Ecovyst Inc. collects and uses personal information differently depending on whether you are an employee, job applicant, business partner, or visitor to Ecovyst’s Website. Please review the section below consistent with your relationship with Ecovyst Inc. and use of our Website.

#### **Business Partners**

Ecovyst Inc. may collect personal information of current or prospective business partners including customers, suppliers, vendors, service providers, and visitors to its Website.

#### *Information We Collect*

- Your name and contact information including your email address, mailing or physical address, company, and telephone number may be collected through forms that you submit to Ecovyst Inc. through our Website or other electronic means. This contact information is used to establish and maintain business communications needed to

provide or receive goods or services. For customers, the communications may also include offering products or services that may be of interest to you. Depending on your relationship with Ecovyst Inc., your tax identification may be collected as needed for tax reporting purposes.

- Your interest in Ecovyst Inc.'s products or services may also be collected based on forms or survey responses you submit to Ecovyst Inc. through our Website or other electronic means, including products or services previously purchased or considered. Product interests may also be collected through interactions with a representative of Ecovyst Inc. including a salesperson, technical service person, or customer service. Your product interest is used to provide you with information concerning products or services that we believe may be of interest to you.
- Information about your access device and access will be collected and logged when you access or interact with a public Ecovyst Inc. system, including our Website. This information may be used as needed for troubleshooting and maintaining reliable operation of the systems. It is also available for security purposes or forensic investigations, if needed.
- Depending on the services being provided and access granted to Ecovyst Inc. systems, resources, or property, your personal information may be used to conduct a background check for security purposes. Background checks utilize publicly available information including information you voluntarily made public. For example, information you have shared on social media platforms, specifically publicly visible accounts (i.e. LinkedIn). Backgrounds checks are typically conducted by third-party service providers and subject to the standard terms of such providers.

### **Employees and Prospective Employees**

Ecovyst Inc. collects the personal information of job applicants, current employees, and former employees.

We collect personal information using various methods and sources. Personal information may be collected directly from you when you voluntarily provide us with your personal information by submitting the information on forms or by contacting Ecovyst Inc. through email, phone, our Website or a similar method. We may also receive your personal information from an employment agency, payroll, or job recruiting service provider.

#### *Information We Collect*

- Your name and contact information including your email address, mailing or residential address, and telephone number may be collected, as needed, in order to establish and

maintain business communications needed to process an application or manage the employment relationship.

- Starting with the job application and throughout an individual's pre-employment and employment lifecycle, additional personal information may be collected from job candidates or employees, which may include, among other things, government issued tax id, driver's license numbers, education history, certificates, employment history, skills inventory, and performance reviews.
- Personal information may be collected from job applicants to evaluate the job applicant's viability for the job and process the application throughout the recruitment process. Personal information collected from employees is used to manage their employment, compensation, benefits, payroll, training, performance, career development, and comply with all applicable legal obligations including required regulatory reporting to appropriate authorities. For more detailed information on the personal information collected and collection method, employees, previous employees, and applicants should consult with their local or respective Human Resources department.
- With an individual's authorization, the individual's personal information may be used to conduct a background check for security purposes. Background checks utilize publicly available information including information you voluntarily made public. For example, information you have shared on social media platforms, specifically publicly visible accounts (i.e. LinkedIn). Backgrounds checks are typically conducted by third-party service providers and subject to the standard terms of such providers. You should review the privacy policies of such service providers before consenting to a background check.
- Information about your access device and access will be collected and logged when you access or interact with an Ecovyst Inc. system such as our Website. This information is used as needed for troubleshooting and maintaining reliable operation of the systems. It is also available for security purposes and forensic investigations, if needed.

### **Other Potential Information Collection**

While generally not collected by Ecovyst Inc., the following information may be collected and used in certain circumstances:

- **Cookies:** By accessing our Website, you consent to us using cookies in accordance with our Cookie Policy, available at [ECOVYST Cookie Policy](#).
- **Protected Classifications under California or federal law:** Examples include age, date of birth, gender, military or veteran status, marital status, nationality, citizenship, pregnancy and related medical conditions, genetic information, or other similar

identifiers. This data may be collected in the course of providing services or products, for background checks, for human resources purposes, for security purposes, or to comply with all applicable legal obligations.

- **Internet or other electronic network activity information:** Examples include information including (but not limited to) browsing history and search history. This information may be used for security purposes, including to prevent unauthorized access or disclosure, to maintain data accuracy, to protect the confidentiality, integrity and availability of your personal information and to allow only the appropriate use of your personal information or to improve our Website, services and products, through testing, research, analysis and product development.
- **Inferences drawn from any of the information identified in the above categories used to create a profile about a customer:** This information may be used to provide services, products, or customer service.

## Data Sources

In addition to the avenues described above, Ecovyst Inc. may obtain your personal information from the following sources:

1. Directly from you (whether you are a customer, employee, applicant, or prospective employee), when you voluntarily provide us with your personal information. For example:
  - a. When you submit information on forms.
  - b. When you contact Ecovyst Inc. via our Website, email, phone, or other similar methods.
  - c. When you register your identity for authenticating to a computerized system (i.e., timeclock, network, access control, submit information on forms). See vendor information below.
2. Directly or indirectly from vendors, service providers or other third parties. For example:
  - a. Our business customers or our service providers (in the course of or as part of the provision of services).
  - b. Information you voluntarily made public (i.e., for our use in background checks).
  - c. Information you have shared on social media platforms, specifically publicly visible accounts (i.e., LinkedIn).
  - d. Information you have provided to a recruiting service provider.
3. From your use, visit or activity on any of our Websites. For example:
  - a. Directly (through your submission of information).

- b. Indirectly (through information disclosed by your device or browser, such as an IP address)

### **With Whom We Share Your Personal Information**

Ecovyst Inc. may share your personal information, as described above, solely with the following third parties:

1. Service providers (including contractors and other third parties) as needed in performing the contracted work.
2. Affiliates/subsidiaries and related entities of Ecovyst Inc.
3. Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.
4. External advisors, such as auditors or outside legal counsel.
5. Governmental, legal, regulatory, or other similar authorities and/or local government agencies, upon request or where required.

***Ecovyst Inc. does not sell personal information to anyone.***

### **Your Rights Regarding Your Personal Information**

If you are a natural person residing in one of the countries in the European Economic Area, the United Kingdom, Switzerland, or any country or state in the United States that has enacted a jurisdiction-specific privacy law (each a “**Data Protection Jurisdiction**”) and to the extent such laws are applicable to Ecovyst, Inc., you have certain Privacy-Related Rights (“**Rights**”) with respect to your personal information. The followings section is intended to provide a general outline of these Rights and Ecovyst Inc.’s recognition of and compliance efforts related to such Rights.

**Right to Notice:** At or before the point of collection of personal information, customers, employees, job applicants and other individuals are entitled to a notice that provides the categories of personal information collected about them, and the purposes for that collection.

**Right to Know/Right to Access:** A customer has the right to request information regarding our collection, disclosure, sale and/or use of their personal information over the previous twelve (12) months. A customer may request that Ecovyst Inc. disclose:

- Categories of personal information that we have collected about you;
- Categories of sources from which your personal information is collected;
- Categories of personal information about you that we have sold or disclosed for a business purpose;

- Categories of third parties to whom the personal information was sold or disclosed for a business purpose;
- The business or commercial purpose for collecting or selling personal information; and
- Specific pieces of personal information that we have collected about you.

When providing you with your information electronically, Ecovyst Inc. will, to the extent possible, deliver the information in a portable manner that allows you to transfer the information to another entity.

Ecovyst Inc. may reject your request to know if your identity cannot be verified (your request is not a verifiable customer request), or if the information has already been provided twice within a twelve (12) month period. Ecovyst Inc. may also refuse to provide you with specific pieces of information that we have collected about you if disclosure creates a substantial, articulable, and unreasonable risk to the security of that personal information, your account with Ecovyst Inc. or the security of our systems.

**Right of Deletion:** A customer has the right to request the deletion of any personal information that we have collected from them, or that we maintain about them. Following our receipt of your verifiable customer request, Ecovyst Inc. will delete (and direct our service providers to delete) your personal information, subject to the exceptions permitted under the applicable privacy law, and any legal obligations that we have to retain that information.

**Right to Opt-Out of the Sale of Your Personal Information:** Some laws may provide customers with the right to opt-out of the sale (as defined under the law) of their personal information. Ecovyst Inc. does not sell personal information, and thus does not provide you with a mechanism for opting out.

**Right to Non-Discrimination:** Ecovyst Inc. will not discriminate against you in response to your decision to exercise any of the privacy rights granted to you under any applicable privacy law.

**Asserting Your Rights - Submitting a Request to Know or Delete:** As previously stated, Ecovyst Inc. may reject your request if we cannot verify your identity. Please follow the instructions below and provide the requested information to allow us to adequately address your request.

1. If you are a current or former employee of Ecovyst Inc. residing in a Data Protection Jurisdiction and want to assert the Right to request to know or delete any personal information Ecovyst Inc. may have, you may submit your request via email at [webenhance@ecovyst.com](mailto:webenhance@ecovyst.com). In the email, please indicate which Right you are exercising. In order to verify your identity, your request must include the following:
  - a. Your full name and email address associated with your profile;
  - b. Your preferred contact phone number; and
  - c. Your hire date. Where possible, we require your hire date to be provided in the MM/DD/YY format.

2. If you previously applied for employment with Ecovyst Inc. (job applicants) and reside in a Data Protection Jurisdiction and want to assert the Right to request to know or delete any personal information Ecovyst Inc. may have, you may submit your request via email at [webenhance@ecovyst.com](mailto:webenhance@ecovyst.com). In the email, please indicate which Right you are exercising. In order to verify your identity, your request must include the following:
  - a. Your full name and email address associated with your profile;
  - b. Your preferred contact phone number; and
  - c. The number of employment opportunities you have applied for with Ecovyst Inc., as well as the Job Title and Job Code associated with each application, to the extent available.
  
3. If you have provided Ecovyst Inc. with your information via our Website and reside in a Data Protection Jurisdiction and want to assert the Right to request to know or delete any personal information Ecovyst Inc. may have, you may submit your request via email at [webenhance@ecovyst.com](mailto:webenhance@ecovyst.com).
  - a. Your full name and email address, as provided by you to Ecovyst Inc. via our Website;
  - b. Your preferred contact phone number; and
  - c. A brief description of why you believe Ecovyst Inc. has your personal information (i.e., you have submitted a “contact us” form through our Website). Please note that any information you provide to Ecovyst Inc. under this section will be used solely for verification purposes and deleted once verification is established.

**Authorized Agents:** You may exercise your right to know or your request for deletion of your personal information, through the use of an authorized agent. A request from an authorized agent on your behalf will only be accepted if the authorized agent provides us with written proof they are authorized to act on your behalf. We may also first require the authorized agent to verify their identity before accepting the request. Ecovyst Inc. may deny requests from authorized agents that fail to provide proof of their status as an authorized agent or verification of their identity.

### **Disclosure of your Personal Information when Required by Law**

Ecovyst Inc. may disclose your personal information as required by law, with or without notice, when Ecovyst Inc. believes that disclosure is necessary to:

- Comply with the law, including a regulatory requirement, legal process served on Ecovyst Inc. or the Ecovyst Inc. Website, government request, or court order.
- Protect and defend the rights or property of Ecovyst Inc. and its users.
- Protect the personal safety of users of Ecovyst Inc. or the public.

Ecovyst Inc. may also disclose to third parties, without restriction, aggregate information about users of the Website that is not personally identifiable.

### **Data Integrity**

With respect to personal information obtained by Ecovyst Inc. from customers, visitors to the Website and Ecovyst's employees or job applicants, Ecovyst Inc. will take reasonable steps to provide that your personal information is accurate, complete, and current. We provide individuals with reasonable access to the personal information that they provide to us, as well as the ability to review and correct such information. For access requests, please contact us in accordance with the procedure above under "Your Rights Regarding Your Personal Information."

In addition, with respect to personal information obtained by Ecovyst Inc. from its employees and job applicants, Ecovyst Inc. will only use such personal information in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual.

### **How We Store and Protect Your Information**

To prevent unauthorized access or disclosure, to maintain data accuracy, and to allow only the appropriate use of your personal information, we utilize physical, technical, and administrative controls and procedures to safeguard the information we collect.

To protect the confidentiality, integrity, and availability of your personal information, Ecovyst Inc. utilizes a variety of physical and logical access controls, firewalls, intrusion detection/prevention systems, network and database monitoring, anti-virus, and backup systems. We use encrypted sessions when collecting or transferring sensitive data through our Website.

We limit access to your personal information and data to those persons who have a specific business purpose for maintaining and processing such information. Ecovyst Inc.'s employees who have been granted physical access to your personal information are made aware of their responsibilities to protect the confidentiality, integrity, and availability of that information and have been provided training and instruction on how to do so.

Ecovyst Inc. will retain your personal information so long as your account is active or it is reasonably needed for the purposes described in this Policy or to comply with our legal obligations, resolve disputes, and as applicable to agreements with our customers.

### **Privacy Policies of Other Websites**

Ecovyst Inc.'s Websites may contain links to third-party sites for your convenience and/or information. If you access those links, you will leave Ecovyst Inc.'s Website and be re-directed to a third-party site. Ecovyst Inc. does not control those sites or the privacy practices of those third-party sites, which may differ from Ecovyst Inc.'s privacy practices. We do not endorse or make any representations about third-party websites, and the personal information you choose



to provide to third-party websites is not covered by this Policy. We encourage you to review the privacy policy of any website or company before submitting your personal information to them.

### **International Information Transfers**

Ecovyst Inc. is a global organization with its corporate headquarters in the United States. Our servers, databases, and service providers are located in the United States, the European Economic Area, the UK, Switzerland, and other jurisdictions around the world.

Ecovyst Inc., and the U.S. entities and subsidiaries listed in Ecovyst Inc.'s self-certification pursuant to the Data Privacy Framework, comply with and adhere to the EU-U.S. Data Privacy Framework ("EU-U.S. DPF"), the UK Extension to the EU-U.S. DPF ("UK DPF"), and the Swiss-U.S. Data Privacy Framework ("Swiss DPF"), as set forth by the U.S. Department of Commerce. Ecovyst Inc. has certified to the U.S. Department of Commerce that it adheres to the [Data Privacy Framework Principles](#) ("DPF Principles") with regard to the processing of personal data received from the European Economic Area in reliance on the EU-U.S. DPF, from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF, and from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this Policy and the DPF Principles, the DPF Principles shall govern. To learn more about the Data Privacy Framework ("DPF") program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>. The Federal Trade Commission has jurisdiction over Ecovyst Inc.'s compliance with the EU-U.S. DPF, the UK DPF, and the Swiss DPF.

Different countries have different privacy laws and requirements, and some, including the United States, may provide less legal protection for your personal information than others. If you object to the transfer of your information to the United States or other jurisdictions, please do not use Ecovyst Inc.'s Website or provide Ecovyst Inc. with your information.

Ecovyst Inc. is responsible for the processing of personal information it receives under the DPF, and subsequently transfers to a third party acting as an agent on Ecovyst's behalf. Ecovyst Inc. complies with the DPF Principles for all onward transfers of personal data from within the European Economic Area, including the onward transfer liability provisions.

### **Children Under the Age of 16**

Ecovyst Inc.'s Website is not intended for children under 16 years of age, and Ecovyst Inc. does not knowingly collect information from children to sell or promote our products or services. No one under the age of 16 may provide information to Ecovyst Inc. on or through our Website, and if we learn that we have received information from a child under the age of 16, we will delete that information. If you believe a child under the age of 16 has sent personal contact information to Ecovyst Inc., please contact us immediately and we will use reasonable efforts to promptly remove that information from our systems.

This section does not apply to jurisdictions where Ecovyst Inc. may have a presence, which permit children under the age of 16 to work for or apprentice with Ecovyst Inc., subject to applicable parental consent requirements. In such cases, Ecovyst Inc. will comply with the laws of the applicable jurisdiction.

### **Changes to this Policy**

Ecovyst Inc. will occasionally update this Policy to reflect company and customer feedback. Any changes will be posted on this page and effective upon updating this Website. ***This Privacy Policy was last updated on February 12, 2024.***

By continuing to use the Website and services provided by Ecovyst Inc., you indicate your consent to the data collection, use, and disclosure practices described in any updated Policy. You are responsible for periodically reviewing this Policy to be informed of how Ecovyst Inc. is treating your personal information.

### **Dispute Resolution**

Ecovyst Inc. will investigate and attempt to resolve complaints and disputes regarding the use and disclosure of personal information in accordance with the principles contained in this Policy. Ecovyst Inc. agrees to cooperate with Data Protection Authorities located in the European Economic Area, and relevant counterparts located in the United Kingdom and Switzerland. We strongly encourage you to raise any complaints you may have with regard to this Policy and/or our activation of this Policy to us prior to proceeding to the dispute resolution procedure described in this paragraph. To raise complaints to Ecovyst, you may contact us using the Contact Information set forth below.

If you think your data protection rights have been breached and you are located in the European Economic Area, you may file a complaint with your national Data Protection Authority here: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en).

If you think your data protection rights have been breached and you are located in the United Kingdom, you may file a complaint with the Information Commissioner's Office here: <https://ico.org.uk/make-a-complaint>.

If you think your data protection rights have been breached and you are located in Switzerland, you may file a complaint with the Swiss Federal Data Protection and Information Commissioner (FDPIC) here:  
[https://www.edoeb.admin.ch/edoeb/en/home/deredoeb/kontakt/anzeigeformular\\_betroffene.html](https://www.edoeb.admin.ch/edoeb/en/home/deredoeb/kontakt/anzeigeformular_betroffene.html)

Pursuant to the DPF Principles, Ecovyst Inc. will refer unresolved privacy complaints to an independent dispute resolution mechanism, JAMS Data Privacy Framework Dispute Resolution, administered through JAMS ADR. If you do not receive a timely acknowledgment or satisfactory resolution of your complaint, please visit <https://www.jamsadr.com/DPF-Dispute-Resolution> for more information and to file a complaint. This service is provided free of charge to you.

If Ecovyst Inc. and JAMS ADR are unable to resolve your complaint satisfactorily, pursuant to the DPF, you may have the right, under certain circumstances, to invoke binding arbitration to resolve complaints not resolved by other means, as described in [Annex I](#) to the DPF Principles.

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, Ecovyst Inc. commits to cooperate and comply respectively with the advice of the panel established by the EU Data Protection Authorities (DPAs), the UK Information Commissioner's Office (ICO), and the Swiss Federal Data Protection and Information Commissioner (FDPIIC) with regard to unresolved complaints concerning our handling of human resources data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF in the context of the employment relationship.

### **Contact Information**

If you have any questions, comments, or requests regarding this Policy, please contact us by emailing [webenhance@ecovyst.com](mailto:webenhance@ecovyst.com), or write to the following address:

Ecovyst Inc.  
Data Protection Compliance Team  
300 Lindenwood Drive  
Malvern, PA 19355