

Olin Corporation Biometric Privacy Notice

Scope

This Biometric Privacy Notice (“**Notice**”) describes how Olin Corporation and its affiliates and subsidiaries (“**Company**,” “**we**,” “**us**,” or “**our**”) process (or permit vendors to process on our behalf) retina or iris scans, fingerprints, voiceprints, or scans of hand or face geometry that may be considered “biometric data” under certain laws. Company and our vendors collect such information from Company employees, managers, officers, directors, agents, contractors, subcontractors, and other personnel (individually referred to as a “**Staff Member**” and collectively referred to as “**Personnel**”) in connection with certain employment functions. We may also collect information from Company vendors, contractors, and visitors (collectively “third parties”) in connection with government requirements for site access at certain sites. It is our policy to collect and process biometric data in compliance with all applicable laws.

Collection and Use

Company may, or may utilize vendors to, collect biometric data to monitor the alertness and compliance with safety requirements of drivers and other Staff Members who may work inside Olin’s fleet. Additionally, Company or its vendors may collect biometric data of Personnel and Third Parties to verify information on Transportation Worker Identification Credentials (“TWIC cards”).

Consent

Prior to collecting or otherwise obtaining biometric data, we (or our vendors) obtain consent to process this biometric data. You may be required to consent to biometric data processing as a condition of employment. Third Parties may be required to consent to biometric data processing as a condition of site access if such screening is required by federal law. Please contact Olin’s Data Protection Officer at dpo@olin.com or your Human Resources Business Partner if you have any questions.

Retention and Disposal

TWIC related biometric data is stored on the TWIC card. The TWIC reader validates the fingerprints placed on the biometric reader match the data contained on the card. The Biometric data is not stored in the TWIC reader system. Additionally, biometric data may be stored in a Lytx managed application database. We do not retain biometric data longer than permitted or required by applicable law. It is our policy to delete biometric data upon the earlier of (a) a reasonable period of time after the purpose for collecting the biometric data has been satisfied; or (b) within 1 year of a Staff Member’s last interaction with Company.

Sharing

We do not (and do not authorize our affiliates or vendors to) sell, lease, or otherwise profit from biometric data. We may share biometric data with our affiliates or vendors only to monitor for driver alertness and compliance with safety requirements. We may also share biometric data with third parties when:

- A Staff Member or a Staff Member’s authorized representative provides written consent;
- Disclosure is permitted or required by law, such as in response to subpoenas, court orders, or other legal processes; or

- In connection with a merger, acquisition, insolvency, or other corporate transaction.

Questions

Please contact Olin's Data Protection Officer at dpo@olin.com or your Human Resources Business Partner if you have any questions about this Notice.

Last Updated on January 17, 2023.