

ECOLAB INC. PRIVACY POLICY STATEMENT

PERSONAL DATA

A. Ecolab Commitment to Data Privacy Protection

The Statement set forth below outlines the Personal Data that Ecolab may collect, how Ecolab uses and safeguards that data, and with whom we may share it. This Statement is intended to provide notice to individuals regarding Personal Data in an effort to be compliant with the data privacy laws and regulations of the jurisdictions in which Ecolab operates as well as compliance with its own Data Privacy Compliance Manual.

Ecolab encourages our customers, suppliers, commercial visitors, business associates, investors and other interested parties to read this Statement. By using our website or submitting Personal Data to Ecolab by any other means, you acknowledge that you understand and agree to be bound by this Statement, and agree that Ecolab may collect, process, transfer, use and disclose your Personal Data as described in this Statement.

B. General Data Privacy Principles

Ecolab is committed to the goal of adhering to these Privacy Principles in all processing of Personal Data.

Notice: Ecolab will notify individuals at the time of collection of data, or a reasonable time thereafter based on the laws and regulations of the relevant jurisdiction, the purposes for which it is collecting and using information about them. This notice shall include information about who can be contacted about inquiries or concerns, the type of third parties that the information may be disclosed to, and choices available for use and disclosure of that data.

Choice: Ecolab provides all individuals the opportunity to opt out of information disclosure to a Third Party not provided in initial notice or use in a manner not provided in initial notice. If the information is considered Sensitive Personal Data as defined by the EU, Ecolab assumes the Data Subject has opted out of having such information disclosed to Third Parties, and a Data Subject must expressly opt in to consent such disclosure.

Onward Transfer (Transfer to Third Parties): The Notice and Choice Principles defined in these principles shall be applied to all onward transfers of personal data. Ecolab will not transfer Personal Data to a Third Party without notice unless one of the following applies:

- Ecolab can ensure the Third Party is in compliance with EU Safe Harbor Principles;
- The Third Party is subject to the EU Data Protection Directive;
- The Third Party has certified via agreement that it provides a level of protection equivalent to the Safe Harbor Principles.

Access: Ecolab provides Data Subjects access to their Personal Data and opportunity to correct, amend, or delete that Personal Data when inaccurate, except in certain circumstances allowed in EU Safe Harbor Principles.

Security: Ecolab takes reasonable precautions to protect Personal Data from loss, misuse, and unauthorized access, disclosure, alternation, and destruction.

Data Integrity: Ecolab only holds information relevant for the purpose for which it is to be used, as described in this Statement. Ecolab takes reasonable steps to ensure that information is reliable for its intended use, accurate, complete, or current.

Enforcement: Ecolab provides recourse mechanisms to resolve individual concerns or disputes regarding Personal Data. Ecolab provides the procedures as outlined in this Statement for providing verification to individuals that Safe Harbor Principles have been implemented. Ecolab is committed to providing a prompt remedy for any failure to comply with the EU Safe Harbor Principles, the laws or regulations of other jurisdictions, and/or its own privacy policies and procedures.

C. Personal Data

Ecolab is committed to maintaining all reasonable precautions to assure the privacy and security of Personal Data gathered by Ecolab. During your use of our website or through other communications with Ecolab, Personal Data may be collected and processed by Ecolab. In general, Ecolab collects personal contact information (e.g. name, company, address, telephone number and e-mail address), which you knowingly provide either by registration, survey, answering questions or otherwise for use in our commercial relationship. At times we may collect additional Personal Data that you voluntarily provide, including, but not limited to, job title, additional contact information, date of birth, hobbies, areas of interest, and professional affiliations.

D. Use of Personal Data

Ecolab's website is intended to be used by Ecolab customers, commercial visitors, business associates, investors, and other interested parties for business purposes. Personal Data collected by Ecolab through its website or by other means is used in support of our commercial relationship with you, including, but not limited to, the processing of customer orders, managing accounts, learning about customers' needs, responding to inquiries, and providing access to information. Also, in compliance with the laws and regulations of the relevant jurisdiction to support our relationship with you:

- we may share Personal Data with our worldwide affiliates to better understand your business needs and how we can improve our products and services;
- we may use third party service providers to assist us in collecting, assembling or processing Personal Data in connection with services related to our business relationship;
- we (or a third party on our behalf) may use Personal Data to contact you about a Ecolab offer in support of your business needs or to conduct online surveys to understand better our customers' needs; and
- we may use Personal Data for marketing and promotional activities.

If you choose not to have your Personal Data used to support our customer relationship (especially direct marketing or market research), we will respect your choice. We do not sell your Personal Data to Third Parties, nor share it with third parties except as set forth in this Statement.

E. Third Party Service Providers

Ecolab is the commercial operator of its website and uses service providers to assist in hosting, and providing software and content for our sites and providing other services. Ecolab may disclose Personal Data supplied by you to these Third Parties who provide such services under contract to protect your Personal Data. In addition, where consistent with the laws and regulations of the relevant jurisdiction, Ecolab may disclose Personal Data if such disclosure:

- is a use of the Personal Data for an additional purpose that is directly related to the original purpose for which the Personal Data was collected;
- is necessary to prepare, negotiate and perform a contract with you;
- is required by law or the competent governmental or judicial authorities;
- is necessary to establish or preserve a legal claim or defense;
- is part of a corporate restructuring, sale of assets, merger or divestiture; or,
- is necessary to prevent fraud or other illegal activities, such as willful attacks on Ecolab information technology systems.

F. Non-Personal Data Collected Automatically

When you access Ecolab’s website, we may automatically (i.e., not by registration) collect non-personal data (e.g. type of Internet browser and operating system used, domain name of the website from which you came, number of visits, average time spent on the site, pages viewed). We may use this data and share it with our worldwide affiliates to monitor the attractiveness of our websites and improve their performance or content. In this case, processing is performed on an anonymous basis and at Ecolab’s discretion.

G. Other Online Data

In addition, certain online technical applications or other interactions you have with Ecolab may require the entry of business and technical data. By providing the requested information, you are consenting to the processing and storage of such information by Ecolab. Unless Ecolab is advised that you want this information removed from Ecolab’s server, such information may be retained by Ecolab and used for future commercial communications. A request for removal of this information can be made at the contact information provided below. Ecolab will take all reasonable precautions to assure that no such information will be provided or divulged to other Third Parties, except, if applicable, those Third Parties performing site hosting, maintenance, and related site service activities.

H. “Cookies” – Information Stored Automatically on Your Computer

Cookies are information stored automatically on a website user’s computer. When a user views Ecolab’s website(s), Ecolab may store some data on the user’s computer in the form of a “cookie” to automatically recognize the user upon future visits to Ecolab’s website(s). Ecolab will make reasonable efforts to ensure compliance with the laws and regulations of relevant jurisdictions with regard to cookies.

I. Children

Ecolab will not knowingly collect Personal Data from children under the age of 18. Ecolab’s website(s) is not intended for individuals under 18 years of age

J. Security and Data Integrity

Ecolab will take reasonable precautions to protect Personal Data in its possession secure against the risk of loss, misuse, unauthorized access, disclosure, alteration and destruction. Ecolab periodically reviews its security measures in an effort to ensure the privacy of Personal Data.

Ecolab will use Personal Data only in ways that are compatible with the purposes for which it was collected or subsequently authorized by you. While Ecolab will take reasonable steps to ensure that Personal Data is relevant to its intended use, accurate, complete, and current, Ecolab is also relying upon each individual to assist in providing accurate updates of his or her Personal Data.

K. Links to Other Websites

Ecolab website(s) may contain “links” to websites owned and operated by Third Parties. By accessing these links, which are provided for your convenience, you will leave our site and will be subject to the privacy practices of the other website. This Statement does not apply to any personal information you provide to unrelated Third Parties.

L. Data Retention

In general, Ecolab will retain Personal Data for as there is a need for the data, plus 10 years, or as otherwise required by the laws and regulations of a particular jurisdiction. For example, data will be retained during the time period that you are authorized to use Ecolab website(s), including any Ecolab tools accessible through our website(s). Upon termination of such authorization, your Personal Data related to use of Ecolab website(s) will be removed.

M. Data Access and Correction

Upon request, Ecolab will grant individuals reasonable access to Personal Data that it holds about them. In addition, Ecolab will take reasonable steps to permit individuals to correct, amend, or delete information that is demonstrated to be inaccurate or incomplete. Ecolab also relies upon each individual to assist in providing accurate updates of his or her Personal Data. In order to access, correct, amend, or delete the Personal Data Ecolab holds about an individual, the individual should contact the following:

PHONE: (630) 305-2940

EMAIL: dataprivacy@ecolab.com

N. U.S. – EU and U.S – Switzerland Safe Harbor Participation

Personal Data collected in the European Union (“EU”) is subject to the European Data Protection Directive (95/46/EC) and similarly Switzerland has adopted a data protection law (together the “Data Privacy Laws”). The U.S. Department of Commerce has agreed separately with the European Commission and the Federal Data Protection and Information Commissioner of Switzerland upon similar sets of data protection principles (“Safe Harbor Privacy Principles”) and frequently asked questions (the “U.S.-EU Safe Harbor Framework” and the “U.S.-Swiss Safe Harbor Framework”) to enable U.S. companies to satisfy the requirement under the Data Privacy Laws that adequate protection be given to personal information transferred from the EU or Switzerland to the United States.

Ecolab complies with the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. Ecolab has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, access, security, data integrity, and enforcement.

More information about Safe Harbor program and Ecolab's certification can be found at the U.S. Department website <http://www.export.gov/safeharbor/>. Individuals in the EU and Switzerland may contact the Ecolab Safe Harbor Privacy Contact identified below to review the Personal Data that Ecolab holds about them. If an individual in the EU or Switzerland cannot resolve an issue concerning his/her Personal Data, such individual can contact the local data protection authority for assistance.

If you have any questions about our Safe Harbor participation or this Statement as it relates to any jurisdiction or country, or if you have any concerns regarding your Personal Data, please contact:

PHONE: (630) 305-2940

EMAIL: dataprivacy@ecolab.com

You may also seek independent recourse outside of Ecolab through the following means:

The EU Data Protection Authorities

ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm

O. Changes to this Statement

Ecolab reserves the right to modify this Statement from time to time in order that it accurately reflects the regulatory environment and our data collection principles. When material changes are made to this Statement, Ecolab will post the revised Statement on our website.

P. Questions and Comments

If you have any questions or comments about this Statement (e.g. to review and update, or remove your Personal Data from our database) please contact (630) 305-2940 or dataprivacy@ecolab.com