

External Stakeholder Privacy Policy

Protecting Your Personal Information

NOVA Chemicals is committed to safeguarding the privacy and confidentiality of personal information (“PI”) of its external stakeholders (including for the purposes of this policy, neighbours, landowners, community members, and individuals otherwise engaged with NOVA Chemicals) and complying with the privacy and data protection legislation in each jurisdiction in which we operate. This External Stakeholder Privacy Policy (the “Policy”) describes the categories of PI that we collect, how we use and secure your PI, and how we disclose your PI. This Policy also describes your rights regarding your PI acquired by NOVA Chemicals and how you can access, correct, and request erasure of your PI.

Because we respect and value our stakeholders, we want you to understand that we value and protect the privacy and confidentiality of the PI we gather because of your relationship with us.

NOVA Chemicals’ Privacy Policy

NOVA Chemicals follows all applicable privacy laws. This Policy has been compiled to better serve those who are concerned with how their PI is being collected, used, retained, and disclosed. PI, as defined in privacy law, is information that can be used on its own or with other information to identify, contact, or locate a single person. Please read this Policy carefully to get a clear understanding of how we collect, use, protect, or otherwise handle PI. This Policy guides our conduct in the collection, use, disclosure, retention, and security of PI. This Policy applies to all external stakeholders who provide their PI and any person or organization responsible for handling PI on behalf of NOVA Chemicals.

Collection of Stakeholder Personal Information

When you engage with NOVA Chemicals, we collect PI from you and information about you during your relationship with us. NOVA Chemicals normally collects PI directly from individuals, but we may collect PI about individuals from other sources with appropriate consent to do so or if required or authorized under applicable legislation.

The type of information we collect will be unique, depending upon your relationship with us and what is necessary to support that relationship. For example, for emergency response, we collect information in greater detail than in other general community engagement initiatives.

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- Examples of PI that we collect may include some or all of the following:
 - Name;
 - Address(es);
 - Phone number(s);
 - Email address(es);
 - Emergency contact information;
 - Medical information relevant to emergency planning;
 - Demographic information;
 - Martial or family status including details about family members;
 - Photographs;
 - CCTV footage, if you enter our facilities; and
 - Voicemail recordings.

Purpose

NOVA Chemicals collects, uses, retains, and discloses PI about individuals to establish or manage your engagement with NOVA Chemicals and for other legitimate business purposes which include, but are not limited to:

- Emergency response and personal safety;
- Stakeholder administration;
- Community engagement;
- Resolving disputes, complaints or legal procedures;
- Working with consultants to improve our business;
- Complying with applicable laws; and
- Other purposes with your consent.

(collectively, the “**Purpose**”)

Consent

We will provide you with prior notice about any additional information we collect, use, retain, or disclose and our purpose for doing so. In other circumstances, NOVA Chemicals will collect, use, retain, or disclose PI where collection, use, retention, or disclosure without consent is authorized or required by law. We may assume your consent in cases where you voluntarily provide the information for an obvious purpose or when you do not opt out of collection, use, retention, or disclosure when given a reasonable opportunity to do so.

NOVA Chemicals assumes your consent to continue to use and, where applicable, disclose PI that we have already collected, for the purpose for which the information was collected.

Protection of Personal Information

Your file is securely maintained. We protect PI in a manner appropriate to the sensitivity of the information provided and take extra precautions to protect sensitive PI. We make every reasonable effort to prevent any loss, misuse, disclosure, or modification of PI, and unauthorized access to PI.

PI is maintained in secure digital files with limited access. We ensure that PI is encrypted and require strong passwords to access electronic databases. Any paper used in the collection of PI is physically destroyed once the information is transferred to the database.

At NOVA Chemicals, your PI is only accessible by individuals who need to have access for their roles (ex. Communications, Emergency Services & Security, Legal, Ethics & Compliance, etc.). These individuals are trained in the importance of keeping PI confidential.

Information may be shared with or accessed by our service providers so that they can perform services on our behalf. Our service providers have privacy and security standards in place that meet or exceed NOVA Chemicals' requirements. We include contractual clauses and other measures with our service providers to maintain your privacy and to prevent PI from being used improperly. We audit our security measures and those of our third-party service providers to ensure that they are effective and appropriate.

Use and Disclosure of Personal Information

NOVA Chemicals only uses and discloses PI with our employees, contractors, consultants, group companies, third-party service providers and other parties who require such information:

- For the Purpose;
- As part of our regular reporting activities to other members of our group of companies;
- Where the PI is publicly available; and
- If a business transfer or change in ownership (or a potential one) occurs.

In the event of a potential or actual change in ownership, a merger/acquisition, joint venture, or other business transaction provided that such receiving party is bound by appropriate agreements or obligations and required to use or disclose your PI in a manner consistent with the use and disclosure provisions of this Policy, unless you consent otherwise, or as permitted under applicable law.

If we wish to use or disclose your PI for any new business purpose, we will ask for your consent unless not required by law.

We require all our third-party service providers, by written contract, to implement appropriate security measures to protect your PI consistent with our policies and practices and any data security obligations applicable to us. We do not permit our third-party service providers to use your PI for their own purposes, or to communicate your PI to third parties without consent, subject to limited exceptions. We only permit them to use your PI for the Purpose.

Cross-Border Data Transfers

We may share PI with parties both in and outside of your home country, and as a result, your PI may be collected, used, processed, stored or disclosed in the United States, Canada, Switzerland, Singapore, France, Spain, and, in some cases, other countries in which we or our service providers operate, potentially globally.

Regardless of what country we operate in, we treat PI with the utmost care. We ensure reasonable data protection when transferring data, in accordance with applicable privacy legislation and only as far as a reasonable level of data protection is assured in the recipient country. We compensate for a lower level of protection through appropriate contracts. We may also transfer data to authorities and other persons abroad if we are legally obliged or permitted to do so.

While NOVA Chemicals will ensure that security and privacy standards, in accordance with all applicable privacy legislation are applied with respect to all PI stored and processed outside of your home country, PI processed and stored outside of your home country may be accessible to foreign government agencies, including law enforcement and national security authorities, or as otherwise required or permitted by law.

Updating Your Personal Information

NOVA Chemicals relies on you to update your PI. For example, if you have had a change of address or telephone number. Unless you advise NOVA Chemicals of these important changes, NOVA Chemicals has no way of knowing about them.

Retention of Personal Identifying Information

We retain PI only as long as reasonable to fulfil the purpose for which the information was collected or for regulatory, legal, or other business purposes. Your PI will be maintained and securely destroyed by NOVA Chemicals in accordance with our Records Management Policy and the Classification and Retention Schedules.

Under some circumstances we may anonymize your PI so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or without obtaining your consent.

Access to Personal Information

NOVA Chemicals is committed to ensuring that we collect only the PI about you that we need to ensure an effective relationship. You can ask to see the PI that we hold about you and receive certain information about our processing. If you want to review your PI, please contact Privacy.Officer@novachem.com.

In some cases, NOVA Chemicals may not be able to provide you with all the PI we have about you. This would occur, for example, if provision of the information could lead to disclosure of another individual's PI, where laws or regulations prevent disclosure, or where overriding interests of NOVA Chemicals or third parties require this measure.

If we do not disclose some or all of your PI processed by us to you, we will advise you of the reason. You can also object to our processing, withdraw consent, ask for a correction of your data and ask for a machine-readable copy of some of your data. These rights are subject to certain conditions and restrictions, but again, we will tell you the reason if this occurs.

Updating Your Information or Requesting Removal of Your Personal Information

You can reach out to the Privacy.Officer@novachem.com to update or request removal of your PI, alternatively you may also reach out the regional contacts joffresite@novachem.com (Alberta) or manestcomm@novachem.com (Ontario).

Compliance with Laws

This Policy is intended to comply with all applicable laws. In the event this Policy conflicts with applicable law in any way, the applicable law shall govern and supersede the conflicting portion of this Policy.

Additional Information and Interpretation

Any questions regarding the application of this Policy should be emailed to Privacy.Officer@novachem.com. This Policy has been approved by SVP Human Resources & Communications of NOVA Chemicals Corporation.