

## PRIVACY POLICY

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Sotera Health LLC, with its global headquarters located at 9100 South Hills Boulevard, Suite 300 Broadview Heights, Ohio 44147, United States of America, and its affiliates (hereafter, together and individually: “**Sotera Health**”, “**we**”, “**our**” or “**us**”) are committed to protecting and respecting your privacy. This Privacy Policy (“**Policy**”) describes how we gather and use your information. This Policy applies to the information we collect, or you provide, through any of Sotera Health’s digital resources (for example, via our websites, applications, email correspondence, marketing materials, and other online or downloadable tools) (collectively, “**online resources**”) that reference or display a link to this Policy. By using websites and other online resources that reference or display a link to this Policy, you are accepting and agreeing to the practices described herein.

### 1. How We Collect Your Information

The companies of Sotera Health operate websites and provide online resources to provide you with information about their business and the products and services they offer. Some of the online resources we offer are in collaboration with third-party service providers. Our relationships with these service providers are governed by agreements that require your information to be processed and held securely. There are three ways in which we gather information:

- **You give us information:** We collect information that you give us by filling in forms or data fields on our websites, or by corresponding with us by phone, email or otherwise. This includes information you provide to us when you complete a contact form, register on our website, or subscribe to Sotera Health communications. The information you give us may include your name, date of birth, contact information (postal address, email address, phone number), professional credentials, function, and contact preferences. To the extent necessary to process a payment, you may also give us certain of your financial information, including credit card information, bank details, tax data, or information regarding credit history.
- **We collect information from your computer or electronic device:** When you visit our websites or otherwise use Sotera Health online resources, we (or a third-party designated by us) may collect information about the computer or electronic device you are using. Information we collect may include the following:
  - technical information, including the Internet Protocol (IP) address used to connect your computer to the internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
  - information provided by tracking technologies, such as cookies, single-pixel tags, local share objects (Flash), local storage, Etags and scripts.
  - information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our website (including date and time), the products or services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page and any phone number used to call our customer service number;

- if you use a mobile device to access our website or online resources, we may collect information about your device, including your device ID and device type, as well as usage information about your device and your use of our mobile websites and other mobile resources.
- **We receive information from other sources:** This is information we receive about you from public sources, including trade and business registers or directories, trade fairs, exhibitions, and news or internet sources. We engage third-party service providers who provide us with technical services, including related to payment processing, data analytics, and advertising, from whom we receive and process information about you. We may also receive information about you from business associations, credit agencies, and insurance companies.

## 2. How We Use Your Information

We use information we hold about you only for permitted purposes, in accordance with applicable national or local data protection laws and applicable provisions of the European General Data Protection Regulation (“**GDPR**”).

- **We use the information you give to us:**
  - to carry out our obligations arising from any contracts entered in to between you and us and to provide you with the information, goods and services that you request from us;
  - to provide you with information about other goods or services we offer that are similar to those that you have already used or inquired about;
  - to provide you with information about goods or services we believe may interest you;
  - to provide you with the possibility to pay online for the goods or services you have requested from us;
  - to review and assess your job application;
  - to notify you about changes to our products or services, or changes to regulatory requirements that may affect our products or services or your use of them; and
  - to ensure that the content from our website is presented in the most effective manner for you and for your computer or device.
- **Information collected from your computer or electronic device:** We (or a third party designated by us) use this information as follows:
  - to improve our website and ensure that content is presented in the most effective manner for you and your computer or device;
  - to measure or understand the effectiveness of advertising we deliver to you and others, and to deliver relevant advertising to you; and
  - to make suggestions and recommendations to you and other users of our website about goods or services that may interest you or them.
- **Information we receive from other sources:** Sometimes we combine the information given to us by you with the information we have collected and the

information we have from other sources. We use this information, including the combined information, for the following purposes:

- to measure or understand the effectiveness of advertising we deliver to you and others, and to deliver relevant advertising to you; and,
- to make suggestions and recommendations to you and other users of our website about goods or services that may interest you or them.

### 3. Legal Basis

We process your information on the following legal bases:

- If it is necessary for pursuit of, or to safeguard, the legitimate interests of Sotera Health, provided that these interests are not overridden by your fundamental rights and freedoms. For example, we use your information to better personalize our product and service offerings, to provide improved customer service, to prevent fraud, and to secure our website.
- If it is necessary to fulfill our contractual obligations. The extent and purpose of our use of your information depends on the contract that we have concluded.
- If it is required to comply with our legal obligations. These obligations may arise from applicable provisions of national or European laws or regulations, including regarding commerce, trade, and tax.
- If you consent to our use of your information. If you have given us your prior express consent we will use your information for business purposes in a manner consistent with the scope of that consent.

### 4. Disclosure of Your Information

If permitted pursuant to our contractual obligations with you, we may share your information with other entities in the Sotera Health group of companies. We make your information available to our affiliates as necessary to fulfil legal and contractual obligations. For example, where permitted, we share your information with our affiliates to facilitate the provision of centralized supplier or customer management services, centralized IT services, and internal finance and accounting shared services. If permitted, we may also share your information with other Sotera Health affiliates so that they may offer you products or services complementary to those you already receive from us.

We work closely with third-party service providers to fulfil certain of our contractual and legal obligations as well. Typical examples of this include the hosting of IT infrastructure, certain payment processing services, and logistics and delivery. You agree that we have the right to share your information with those third-party service providers used to support our business, including:

- Providers of marketing related services and solutions;
- Providers of legal and compliance services and solutions;
- Providers of whistleblowing services;
- Public authorities and national administrations;
- Providers of auditing services;
- Providers of IT related services and solutions;

- Providers of banking services and solutions;
- Providers of online payment services.

We will also disclose your information to third parties:

- In the event we sell or buy any business or assets, in which case we may disclose your information to the prospective seller or buyer of such business or assets;
- If Sotera Health or substantially all of its assets are acquired by a third party, in which case information held by it about its customers may be one of the transferred assets;
- If we are under a duty to disclose or share your information in order to comply with any legal obligation or to protect the rights, property, or safety of Sotera Health, our customers, or others. This includes exchanging information with public authorities (including judicial and police authorities) in the event of, for example, a cyber security incident;
- If appropriate to achieve any of the purposes set out in Section 2 of this Privacy Policy.

## 5. Transfer of Your Information

If you are based in the European Union, we may transfer your information to a destination outside the European Economic Area (“**EEA**”), which might include transfers to Canada and the United States of America. Such transfers can be performed, if appropriate to (i) achieve any of the purposes set out in Section 2, or (ii) disclose your information to a third party, in accordance with Section 3.

If we transfer information originating in the EEA to a destination outside the EEA, we will make sure that such information is protected by the following safeguards:

- The laws of the country to which the information is transferred ensure an adequate level of data protection (Article 45, GDPR);
- The transfer is subject to data protection clauses approved by the European Commission (Article 46.2, GDPR) or is subject to the EU-US Privacy Shield; or
- The transfer is based on Binding Corporate Rules (Article 47, GDPR); an approved Code of Conduct (Article 40, GDPR); an approved certification mechanism (Article 42, GDPR); an approved data transfer agreement (Article 46.3, GDPR).

If you wish to receive more information relating to the transfers of such information originating from the EEA or the safeguards that have been implemented (including on how to receive a copy thereof), you can contact us as set out in Section 11, below.

## 6. Your Rights

If you are of resident of the European Union, you have certain rights regarding the personal information we hold about you.

- You have the right to access this information – we want you to be aware of the information we have about you and enable you to verify whether we process your information in accordance with applicable data protection laws and regulations.

- You have the right, under certain circumstances, to block or restrict our further use of your information.
- If your information is inaccurate or incomplete, you have the right to request rectification of your information.
- You have the right, under certain circumstances, to request deletion or removal of your information from our systems.
- If our processing of your personal information is based specifically on your consent, you have the right to withdraw that consent at any time.
- You have the right to obtain from us, under certain circumstances, your information in a structured, commonly used and machine-readable format so you can reuse it for your own purposes across different services.
- You have the right to object to certain types of processing, including processing for direct marketing purposes.
- If you are unsatisfied with our handling of your personal information, you also have the right to lodge a complaint with your national data protection authority.

If you would like to exercise or discuss any of these rights please contact us as set forth in Section 11, below.

## 7. Security of Collected Information

We have implemented a number of security features throughout our website in order to prevent the unauthorized release of, or access to, information we collect and receive from you. While we endeavor to create a website that is always secure and reliable, we cannot guarantee the confidentiality of communications or materials transmitted to or from us (or to or from any other party), via the Sotera Health website or other online resources. We accept no responsibility and are in no way liable for the security of the information transmitted via our website or other online resources.

## 8. Retention of Your Information

We do not keep your information longer than necessary to achieve the purposes stated in this Privacy Policy, unless we are required to do so to comply with applicable legal obligations, including laws and regulations related to the maintenance of commercial and tax documentation and evidence. The retention period for your information is determined based on several criteria, including:

- Time elapsed since your last interaction with us
- End of your contractual relationship with us
- Sensitivity of the information or personal data
- Security reasons
- Applicable statutes of limitation
- Ongoing or potential litigation or dispute (e.g., we need this information to establish or defend legal claims)
- Applicable regulatory or legal obligations

## 9. External Websites

Our online resources may, from time to time, contain links to third-party websites. If you access a third-party website by clicking on a hyperlink, or advertisement incorporating a hyperlink, consult the privacy policies of those websites before you submit information to them. Sotera Health is not responsible for the privacy practices of third-party websites.

## 10. Agreement for the Collection and Use of Your Information; Changes to Our Privacy Policy

By using Sotera Health websites or other online resources, you acknowledge that you have read the terms of this Privacy Policy and you agree with the collection and the use of your information as set out above.

We may amend this Policy from time to time. Changes we make to the Policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to the Policy. Your continued use of our websites and online resources following the posting of changes to this Policy will indicate your acceptance of the Policy changes. This Policy was most recently updated on May 25, 2018.

## 11. Contact Details

Questions, comments and requests regarding the Privacy Policy must be addressed to our General Counsel at [legal@soterahealth.com](mailto:legal@soterahealth.com). Be sure to include "Privacy Policy" in the subject line of your email, and include as an attachment a copy of your identity card or other proof of identity (e.g., driver's license), which will help us prevent unauthorized individuals from accessing, changing or deleting your information.