



PRIVACY POLICY

Effective May 25, 2018

Welcome to the Independent Lubricant Manufacturers Association (ILMA). Since 1948, ILMA has been the voice of member companies that produce more than a quarter of the nation's automotive lubricants and three-quarters of its metalworking fluids for customers who use their products to improve performance and increase efficiency.

In Part I of this Privacy Statement, we set forth ILMA's Privacy Policy as to personal information which we collect online through www.ILMA.org which links to this Privacy Statement from the website.

In Part II of this Privacy Statement, we set forth ILMA's Privacy Policy as to personal information which we collect other than through the ILMA Website (e.g., mobile application or interaction with us through social media).

“Personal information” is any information that enables us to identify you, directly or indirectly, by reference to an identifier, such as your name, identification number, location data, online identifier or one or more factors specific to you. Personal information includes “sensitive personal information” and “pseudonymised personal information,” but it excludes anonymous information or information that has had the identity of an individual permanently removed.

Your use of the ILMA Website, mobile application, interaction with us through social media, and/or provision of your personal information or sensitive personal information to ILMA constitutes your consent to the use, storage, processing and transfer of that information in accordance with this Privacy Statement.

For the purposes of the EU General Data Protection Regulation 2016/679 (the "GDPR") the data controller is the Independent Lubricant Manufacturers Association, 675 N. Washington Street, Suite 275, Alexandria, Virginia, 22314.

ILMA is an organization based in the United States. The ILMA Foundation, which is related to ILMA, has also adopted this Privacy Statement. Where your data are being collected and used by the ILMA Foundation, all references to ILMA herein shall mean the ILMA Foundation.

QUESTIONS

If you have any questions or complaints regarding this Privacy Statement, please contact us at ILMA@ILMA.org. If you have any questions about the ILMA Website or mobile app, please contact us at ILMA@ILMA.org, by phone at 703-684-5574, or send a letter to:

Independent Lubricant Manufacturers Association
675 N. Washington Street
Suite 275
Alexandria, Virginia, 22314

CHANGES TO THIS PRIVACY STATEMENT

We will update this Privacy Statement from time to time, so please periodically check it. If at any point we decide to use personal information in a manner that is materially different from that stated at the time it was collected, we will endeavor to notify you of such changes (*e.g.*, we will post a revised Privacy Statement with a new effective date, display the word "updated" next to the Privacy Policy link on each page on the ILMA Website, or otherwise), prior to implementing them.

PART I – ILMA WEBSITE PRIVACY POLICY

The ILMA Website contains forms for visitors to request information, register for meetings, renew membership dues and conduct other online transactions for products or services offered by ILMA. We use personal information from these forms to provide the membership services and products that you request.

Forms on the ILMA Websites that request financial information do so in order to bill you for meeting registrations, dues renewals, or products or services ordered. Unique identifiers (specifically, your ILMA user ID and password) are collected from website visitors to verify the user's identity for access to restricted content or features on the ILMA Website.

This Privacy Policy discloses ILMA's privacy practices and contains detailed information about the following:

- What information do we collect?
- What are "cookies" and how does ILMA use them?
- Do we share information with third parties?
- How do we use the information we collect?
- How can you review and modify your personal information?
- What is the opt-out policy for ILMA Website?
- Your California privacy rights
- Your European privacy rights
- What types of security procedures are in place to protect against the loss, misuse or alteration of your information?
- How does ILMA Website use bulletin boards, discussion lists, and moderated chats?

1. What Information Do We Collect?

We collect the following personal information about visitors to ILMA's website:

a) Site Use Information

ILMA collects technical information relating to each time a visitor comes to the ILMA Website, including IP address, browser type and version, time zone settings, browser plug-in types and versions, operating system and platform type (e.g., Internet Explorer browser on a Windows platform).

We may also collect information about your visit, including pages 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), and methods used to browse away from the page.

Gathering this technical information helps us to learn what browsers we need to support and helps us determine what sections of the ILMA Website are most popular and how many visitors come to our site. You do not have to register with or be a member of ILMA before we can collect this information.

b) Information You Give Us

You may provide personal information to us which may include your name, home and/or work email address, postal address, phone number and/or fax number, your employer and job title, demographic information about you including birth year, certification designation(s), etc., and if you are making a purchase, your credit card or transaction card information. You are only required to provide such information if you want to take advantage of certain products and services, such as meeting registrations and dues renewals, provided through the ILMA Website. ILMA collects personal information in the following ways from different parts of the ILMA Website:

- **ILMA Membership Applications:** You are sharing personal information with us when you submit an application for your company or business to join ILMA or renew its ILMA membership through the ILMA Website. ILMA members will have ILMA membership log-in credentials which enable members to take advantage of restricted content and features on the ILMA Website.
- **Other Registration:** When registering for specific services, such as the Annual Meeting or Management Forum, we may ask for the same type of personal information.
- **Online Purchases:** When you make any purchase using the ILMA website, we may also ask for the same type of personal information.

2. What are "cookies" and how does ILMA use them?

A cookie is a small text file containing a unique identification number that is transferred from a website to the hard drive of your computer. This unique number identifies your web browser whenever you visit a website that enables cookies.

Cookies are currently used on most major websites. Most web browsers are initially set up to accept cookies. If you prefer, you can reset your browser to notify you when you have received a cookie. You can also set your browser to refuse to accept cookies altogether.

While ILMA does not require you to use cookies, keep in mind that certain services will not function properly if you set your browser to refuse all cookies. To help serve you better, ILMA generally uses cookies to identify return visitors. Cookies let us remember your web browser so we can provide personalized member services such as ILMA search features and “communities” pages. Cookies also allow us to identify ILMA members who are returning to the site.

3. Do we share information with third parties?

Personal information collected through the ILMA Website is generally collected and maintained solely by ILMA or its contracted vendors.

We may share personal information in the following ways:

a) Information You Give Us

1. Personal information provided when you register for services or products. When you provide personal information about you on ILMA Websites to register for a service, such as register for the Annual Meeting or Management Forum, ILMA reserves the right to provide to selected third parties information lists derived from such registrations.

If you wish to opt out of such list distribution at any time, you may do so by following the directions in Item 6 below. We will not share personal information relating to individuals based in the EU unless you have provided your opt in consent.

2. Information provided when joining or renewing membership in ILMA. If you submit an application for your company or business to join ILMA or renew its membership through the ILMA Website, you provide personal information about you on the membership application. ILMA reserves the right to provide such information lists concerning to selected third-parties, including ILMA’s Board of Directors and the administrator of ILMA’s quality testing program.

If you wish to opt out of such distributions at any time during your ILMA membership, you may do so by following the directions in Item 6 below. We will not share personal information relating to individuals or companies based in the EU unless they have provided their opt in consent.

ILMA does not sell to third-parties, e-mail addresses obtained from member applications or renewals.

Sensitive Personal Information. **ILMA does not share with third parties, sensitive personal information such as passcodes, social security numbers, or credit card numbers, except as necessary to complete transactions** requested by you and under strict confidentiality and security protections; nor does ILMA publish such sensitive personal information.

b) Site Use Information

We disclose to third-party sponsors/advertisers aggregate statistics (e.g., impressions and click-throughs on a company's advertisement).

In addition, we may share aggregate website statistics with the media or other third parties. We do not disclose personal information to these sponsors/advertisers or other third parties as part of this process, only information in an aggregate form.

c) ILMA Affiliates

We also allow our affiliate, the ILMA Foundation, ILMA Corporation, to use the information which you may provide when you register for services or products or when you join or renew membership in ILMA, to the same extent as ILMA may use such information under this Privacy Policy, and fully subject to the same limits as ILMA is subject to on the use of such information under this Privacy Policy.

4. How do we use the information we collect?

We use your personal information according to the terms of the Privacy Policy in effect at the time of our use. We will only process your personal information, including sharing it with third parties, where (i) you have provided your consent which can be withdrawn at any time, (ii) the processing is necessary for the performance of a contract to which you are a party (including your membership agreement with us), (iii) we are required by law, (iv) processing is required to protect your vital interests or those of another person, or (v) processing is necessary for the purposes of our legitimate commercial interests, provided your interests and fundamental rights do not override those interests.

We use personal information for the following purposes:

a) Information You Give Us

We use the personal information you give us:

1. to carry out our obligations arising from your membership and any other agreement entered into between you and us
2. to update and renew your company or business' membership as required
3. to provide you with the information, products and services you request from us
4. to arrange and deliver conferences, events and programming relevant to your job and subjects of interest
5. to respond to your questions and provide related membership or customer services
6. to improve the ILMA Website
7. to send you ILMA publications, information about member benefits and special offers, and other information that ILMA believes is relevant and useful to its members, where you have not opted out of receiving such information
8. to send you third-party information that ILMA believes is relevant and useful to you, where you have given your consent

9. to notify you about changes to your membership or related services or to ask you to provide feedback
10. to enable you to complete a survey
11. to administer and protect our business and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)
12. to comply with all applicable laws or legal processes, including providing information on individual users to the appropriate governmental authorities where required by law enforcement or judicial authorities
13. in matters involving a danger to personal or public safety, or to protect the rights, property or safety of ILMA, its members, or others, ILMA may voluntarily provide information to appropriate governmental authorities.

b) Site Use Information

As mentioned above, ILMA uses the aggregate, anonymous data collected to let our sponsors/advertisers know the number of impressions or views and the number of "click throughs" on their advertisement(s).

ILMA also uses this aggregate, anonymous data to perform statistical analyses of the collective characteristics and behavior of visitors to the ILMA Website; to measure user interests regarding specific areas of the ILMA Website; and, to analyze how and where best to use our resources.

Without such data, we would not know which parts of the ILMA Website are the most popular, and we would not be able to change and update the content and services appropriately.

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c) Exceptions

On occasion ILMA collects personal information through the ILMA Website with the intent to afford a greater degree of privacy for such information than is otherwise set forth in this privacy policy.

In those relatively rare situations where ILMA does so, it will clearly disclose to you at the time it collects such information, what degree of privacy will be afforded to the personal information collected at such time; and, ILMA will follow a process to assure that the specifically disclosed degree of privacy is in fact afforded to such information.

For example, ILMA may collect survey information through a survey where ILMA's use of any personal information from that survey is more limited than the general ILMA Privacy Statement would otherwise allow; in such a case, ILMA will disclose the stricter privacy policy governing that survey information at the time such personal information is collected from the survey respondent.

5. How can you review and modify your personal information?

You have the following options for modifying or causing to be deleted personal information or demographic information previously provided by you to ILMA.

1. E-mail: ILMA@ILMA.org
2. Send mail to the following postal address: 675 N. Washington Street, Suite 675, Alexandria, Virginia, 22314, ATTN: Member Services.
3. Call: 703-684-5574.

6. What is the opt-out policy for ILMA Websites?

ILMA provides members and others with the opportunity to opt-out of receiving communications from us. If you no longer wish to receive specific communications or services, you have the following options:

1. You can send an e-mail to: ILMA@ILMA.org
2. You can send mail to the following postal address: ILMA, 675 N. Washington Street, Suite 275, Alexandria, Virginia, 22314, ATTN: Member Services
3. You can call the following telephone numbers: 703-684-5574.

Instructions for opting out of any ILMA e-mails you receive are included with each e-mail.

7. Your California Privacy Rights

For California Residents Only. As a California resident, you have the right to opt-out of having your personal information shared with third parties. We will not share your information after we have received your notification that you are opting out. If you wish to opt-out you have the following options:

1. You can send an e-mail to: ILMA@ILMA.org
2. You can send mail to the following postal address: ILMA, 675 N. Washington Street, Suite 275, Alexandria, Virginia, 22314, ATTN: Member Services.
3. You can call the following telephone numbers: 703-684-5574

8. Your European Privacy Rights

For European Residents Only. If you are based in the EU, in certain circumstances, you have rights under the GDPR in relation to your personal information.

- **Request access to your personal information.** You may have the right to request access to any personal information we hold about you as well as related information, including the purposes for processing the personal information, the recipients or categories of recipients with whom the personal information has been shared, where possible, the period for which the personal information will be stored, the source of the personal information, and the existence of any automated decision making.
- **Request correction of your personal information.** You may have the right to obtain without undue delay the rectification of any inaccurate personal information we hold about you.
- **Request erasure of your personal information.** You may have the right to request that personal information held about you is deleted.
- **Request restriction of processing your personal information.** You may have the right to prevent or restrict processing of your personal information.
- **Request transfer of your personal information.** You may have the right to request transfer of personal information directly to a third party where this is technically feasible.

Where you believe that we have not complied with our obligations under this Privacy Policy or European data protection laws, you have the right to make a complaint to an EU Data Protection Authority, such as the UK Information Commissioner's Office.

If you wish to exercise your European data subject rights, you have the following options:

1. You can send an e-mail to: ILMA@ILMA.org
2. You can send mail to the following postal address: ILMA, 675 N. Washington Street, Suite 675, Alexandria, Virginia, 22314, ATTN: Member Services.
3. You can call the following telephone numbers: 703-684-5574.

9. What kinds of security procedures are in place to protect against the loss, misuse or alteration of your information?

The ILMA Website has security measures equal to or better than those reasonably expected in the industry, such as firewalls, in place to protect against the loss, misuse and alteration of your personal information under our control. While we cannot guarantee that loss, misuse or alteration to data will not occur, we take reasonable precautions to prevent such unfortunate occurrences. Certain particularly sensitive information, such as your credit card number, collected for a commercial transaction is encrypted prior to transmission.

You are ultimately responsible for the security of your ILMA login credentials. You may not share your ILMA login credentials with colleagues or friends so they can access content or features that are restricted to ILMA members only. You should log out of your browser at the end of each computer session to ensure that others cannot access your personal information and correspondence, especially if you share a computer with someone else or are using a computer in a public place like a library or Internet cafe.

10. How does the ILMA Website use “communities”?

The ILMA Website makes “community” pages available to its members that serve like bulletin boards, discussion lists, and moderated chats. Any information that is disclosed in these areas becomes public information, and you should exercise caution when deciding to disclose your personal information. Although users may post messages that will appear on the message boards anonymously, ILMA does retain a record of who posts all notes.

PART II – ILMA PRIVACY POLICY FOR INFORMATION COLLECTED OTHER THAN THROUGH ILMA WEBSITES

If you submit personal information to ILMA through any channel other than the ILMA Websites, including the use of ILMA’s mobile application or interaction with us through social media, the same privacy rules set forth at Part I above for the ILMA Website will be applied to such personal information you submit through channels other than the ILMA Website (including without limitation your opt-out rights at Part I, Section 6 above), except as follows:

1. The "cookies" and other tracking devices used by the ILMA Websites and described in Part I above do not apply to personal information gathered through channels other than the ILMA Website.
2. Hardcopy personal information provided to ILMA that is not converted to electronic media and hosted by ILMA will be subject to different security procedures than will stored electronic personal information. ILMA has security measures equal to or better than those reasonably expected in the industry, in place to protect against the loss, misuse and alteration of your hardcopy personal information under our control.
3. When ILMA collects personal information through channels other than the ILMA Website, it may in some instances apply a different privacy policy to such information; but where it does so it shall conspicuously disclose to you at the time of collection what privacy policy will apply to such information. For example, ILMA may collect survey information through a survey where ILMA's use of any personal information from that survey is more limited than the general ILMA Privacy Statement would otherwise allow; in such a case ILMA will disclose the stricter privacy policy governing that survey information at the time such personal information is collected from the survey respondent.

Mobile Application

We may obtain information through mobile applications that you install on your mobile devices to access and use the ILMA website, applications or services which you use to provide other services related to that mobile application (e.g., to sync information from our application or service with such mobile application). These mobile applications may be our own mobile applications or those belonging to third parties. Where the mobile application belongs to a third party, you must read that third party's own privacy notice as it will apply to your use of that third-party mobile application. We are not responsible for such third-party mobile applications and their use of your personal information.

Mobile applications may provide us with information related to a user's use of that mobile application and use of our applications and services accessed using that mobile application. We may use such information to provide and improve the mobile application or our own application or services (e.g., activity undertaken within a mobile application may be logged).

You can configure our mobile application's privacy settings on your device but this may affect the performance of that mobile application and the way it interacts with our applications and services.