PRIVACY STATEMENT

EFFECTIVE DATE: JANUARY 1, 2020 LAST UPDATED: JANUARY 1, 2023

Welcome to the Castrol U.S. website. Castrol is owned and operated by BP Lubricants USA Inc. (collectively, "Castrol", "we" or "us" or "our"). Castrol respects your privacy and is committed to protecting it. We provide this Privacy Policy ("Policy") to inform you of our privacy practices and of the choices you can make about the way your personal information is collected online and how that information is used.

This Policy applies to all personal information collected during any written, electronic, and oral communications or collected online (collectively, the "Services"), which include: the website located https://www.castrol.com/en_us/united-states/home.html and all corresponding webpages and websites that link to this Policy ("Site"); and any other content, applications, features, functionality, information and services offered by us though the Site.

Use of our Services is subject to conditions of use listed in our legal notice, which you can view here: https://www.castrol.com/en_us/united-states/home/legal-notice.html ("Conditions of Use") and this Policy. Please read the Conditions of Use and this Policy carefully before you use our Services. By using our Services, you accept the Conditions of Use and accept our privacy practices described in this Policy. If you cannot agree with this Policy or the Conditions of Use, please do not access or use our Services.

We may modify this Policy at any time, without prior notice, and changes may apply to any personal information we already hold about you, as well as any new personal information collected after the Policy is modified. If we make changes, we will notify F you by revising the date at the top of this Policy. We will provide you with advanced notice if we make any material changes to how we collect, use or disclose your personal information that impact your rights under this Policy. If you continue to access or use our Services after receiving the notice of changes, you acknowledge your acceptance of the updated Policy.

In addition, we may provide you with real time disclosures or additional information about the personal information handling practices of specific parts of our Services. Such notices may supplement this Policy or provide you with additional choices about how we process your personal information.

1. Personal information We Collect

We collect personal information when you use our Services, create an account with us or submit personal information to us. personal information is any information that relates to you, identifies you personally or could be used to identify you, such as your user ID, name, email address, phone number, address, and payment account number. The types of personal information that we may collect about you include, but are not limited to:

a. Information You Voluntarily Provide to Us on Our Services

When you request information through this Site, we may need to know some personal information about you. When emailing us, subscribing for free news or information, registering for offers, or using any features on the Site such as the Chat, we may need your name, email address, mailing address, vehicle information, and if you are a business your company name, If you chose to purchase information, goods, products, or services, we may require some additional limited financial details. Providing personal information this way is completely voluntary. If any form which collects your personal information allows you to voluntarily provide additional information, we seek this information because we think it will help us to give you a better-quality service. You do not have to provide such information if you do not wish to do so.

b. Information You Provide to Our Affiliates and Subsidiaries

We may receive personal information about you from a company controlled by or under common control with Castrol.

2. Cookies and Other Tracking Technologies

We may use cookies, tags, and similar technologies to automatically collect information on our Services. These tracking technologies allow our technology partners to collect information including your computer's IP address, your mobile device identifier, the type of internet browser you are using, operating system, referral URLs, date/time stamps, pages viewed, and simple keyword tags. Cookies or tags are bits of code that allow our technology partners to collect information including your computer's IP address, your mobile device identifier, the type of internet browser you are using, operating system, referral URLs, date/time stamps, pages viewed, and simple keyword tags.

a. <u>Cookies.</u> The cookies are small web files that a site or its provider transfers to your device's hard drive through your web browser that enables the Site's or provider's system to recognize your browser and remember certain information. Generally, we use first-party and third-party cookies for the following purposes: to make our Services function properly; to provide a secure browsing experience during your use of our Services; to collect passive information about your use of our Services; to measure how you interact with our marketing campaigns; to help us improve our Services; and to remember your preferences for your convenience.

We may use the following types of cookies on our Services:

- Strictly Necessary Cookies. These cookies are essential because they enable you to use our Services. For example, strictly necessary cookies allow you to access secure areas on our Services. Without these cookies, some services cannot be provided. These cookies do not gather information about you for marketing purposes. This category of cookies is essential for our Services to work, and they cannot be disabled.
- Functional Cookies. We use functional cookies to remember your choices so we can
 tailor our Services to provide you with enhanced features and personalized content. For
 example, these cookies can be used to remember your name or preferences on our
 Services. We do not use functional cookies to target you with online marketing. While
 these cookies can be disabled, this may result in less functionality during your use of our
 Services.
- Performance or Analytic Cookies. These cookies collect passive information about how
 you use our Services, including webpages you visit and links you click. We use the
 information collected by such cookies to improve and optimize our Services. We do not
 use these cookies to target you with online marketing. You can disable these cookies.
- Advertising or Targeting Cookies. These cookies are used to make advertising messages
 more relevant to you. They perform functions like preventing the same ad from
 continuously reappearing, ensuring that ads are properly displayed for advertisers, and in
 some cases selecting advertisements that are based on your interests. Our third-party
 advertising partners may use these cookies to build a profile of your interests and deliver
 relevant advertising on other sites. You may disable the use of these cookies as set forth
 below.
- b. Other Tracking Technologies. To see how successfully our marketing campaigns or other Site goals are performing we sometimes use conversion pixels, which fire a short line of code to tell us when you have clicked on a particular button or reached a particular page (e.g. a thank you page once you have completed the procedure for subscribing to one of our services or have completed one of our forms). We also use web pixels to analyze usage patterns on our Site. The use of a pixel allows us to record that a particular device, browser, or application has visited a particular webpage. As described above, we may share your personal information by allowing these third-party ad and analytics services to collect personal information via automated technologies on our Services for cross-context behavioral advertising purposes. The sharing also may be considered processing of personal information for targeted advertising under applicable law. Please see the "Your Choices" section immediately below for additional information on the

rights to opt-out of this disclosure of your information. We do not sell your personal information in exchange for monetary compensation.

- c. <u>Your Choices.</u> Your browser may provide you with the option to refuse some or all browser cookies. You may also be able to remove cookies from your browser. You can exercise your preferences in relation to cookies served on our Sites by taking the steps outlined below.
 - First-Party Cookies. You can use the browser with which you are viewing this Site to enable, disable or delete cookies. To do this, follow the instructions provided by your browser (usually located within the "Help", "Tools" or "Edit" settings). Please note, if you set your browser to disable cookies, you may not be able to access secure areas of the Site. Also, if you disable cookies other parts of the Services may not work properly. You can find more information about how to change your browser cookie settings at http://www.allaboutcookies.org.
 - Mobile Advertising: You can opt out of having your mobile advertising identifiers used for certain types of advertising by accessing the settings in mobile device and following the instructions. If you opt-out, we will remove all data about you and will not collect any further data. The random ID previously assigned to you will be removed. Thus, if at a later stage, you decide to opt-in, we will be unable to continue and track you using the prior ID and you will for all practical purposes be a new user.
 - Third-Party Cookies. To opt-out of third-party advertising networks and similar entities
 that use advertising cookies go to http://www.aboutads.info/choices. Once you click the
 link you may choose to opt-out of such advertising from all participating advertising
 companies or only advertising provided by specific advertising entities. For more
 information about third-party advertising networks and similar entities that use these
 technologies, please see http://www.aboutads.info/consumers.

If you are a Virginia consumer, you may have the right to (1) request access to, correction of, or deletion of your personal information; and (2) opt-out of the processing of your personal information for purposes of targeted advertising or certain profiling. To exercise these rights, please contact us by phone at 1-888-CASTROL or by email at contactus@bp.com. You also may opt out of the processing of your personal information for purposes of targeted advertising by clicking here. You may appeal our decision with respect to a request you have submitted by emailing us at contactus@bp.com.

3. How We Use Your personal information

We will only use your personal information as described in this Policy or as disclosed to you prior to such processing taking place.

a. <u>To Provide You Our Services</u>

We will use your personal information to provide information or perform Services that you request. If the applicable information is to be provided or Service is to be performed by a third party, then we will disclose the applicable information to the third party providing the information or performing applicable Services. All third parties that we work with are contractually obligated to protect your information as disclosed in this Policy.

b. For Internal Use

We use your personal information for the purposes of furthering our business, including improving our Site's content and functionality by analyzing where, on which types of devices and how our Site is used, how many visitors we receive, and where they click through to the Site from. We also use it to remember you in case you re-visit our Site, so we will know if you have already been served with surveys, or (where Site content is undergoing testing) which version of the content you were served.

c. To Provide You with Service-Related Communications

We will send you administrative or account-related information to keep you updated about your account and the Services. Such communications may include information about Policy updates, confirmations of your account actions or transactions, security updates or tips or other relevant transaction-related information. We process your contact information to send you such communications. Service-related communications are not promotional in nature. You are not able to unsubscribe from such communications, otherwise you may miss important developments relating to your account or the Services.

d. To Provide Customer Support or Respond to You

We collect any information that you provide to us, such as in the Live Chat on the Site, when you contact us. Without your personal information, we cannot respond to you or ensure your continued use and enjoyment of the Services.

e. To Ensure the Security of the Services

We care about keeping you secure and safe while using our Services. Keeping you safe requires us to process your personal information, such as your device information, activity information and other relevant information. We use such information to combat spam, malware, malicious activities or security risks; improve and enforce our security measures; and to monitor and verify your identity so that unauthorized users do not gain access to your information. We cannot ensure the security of our Services if we do not process your personal information for security purposes.

f. To Enforce Compliance with Our Terms and Agreements or Policies

When you access or use our Services, you are bound to our Conditions of Use and this Policy. To ensure you comply with them, we process your personal information by actively monitoring, investigating, preventing and mitigating any alleged or actual prohibited, illicit or illegal activities on our Services. We also process your personal information to: investigate, prevent or mitigate violations of our internal terms, agreements or policies and enforce our agreements with third parties and business partners.

g. To Maintain Legal and Regulatory Compliance

Our Services are subject to certain laws and regulations which may require us to process your personal information. For example, we process your personal information to pay our taxes, to fulfill our business obligations, ensure compliance with employment and recruitment laws or as necessary to manage risk as required under applicable law. Without processing your personal information for such purposes, we cannot perform the Services in accordance with our legal and regulatory requirements.

4. Sharing of Your personal information

Other than sharing your personal information so that you can use our Services, or as required or permitted by law, we generally do not share your personal information a with non-affiliated third parties. We may disclose your personal information as described below:

a. Within Our Corporate Organization

Castrol is a part of a corporate organization that has many legal entities, business processes, management structures and technical systems. Castrol operates globally and may share your personal information within this organization in order to provide you with the Services and take actions based on your request. Where this is the case, we do this under a comprehensive, flexible, and global compliance framework which implements appropriate measures and safeguards to ensure that your personal information is protected in accordance with applicable data protection laws.

b. <u>Service Providers</u>

We may share your personal information with service providers acting on our behalf to help us operate our Services. These service providers can only use your data in accordance with our

written instructions and must comply with the information security protections we have put in place.

c. To Maintain Legal and Regulatory Compliance

We have the right to disclose your personal information as required by law, or when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, request from a regulator or any other legal process served on Castrol. If there is a takeover, sale or purchase of our business, we may disclose your personal information to the new (or prospective) owner of the business.

5. Security Precautions

We take precautions to protect data and information under our control from misuse, loss or alteration. Our security measures include industry-standard physical, technical and administrative measures to prevent unauthorized access to or disclosure of your information, to maintain data accuracy, to ensure the appropriate use of information, and otherwise safeguard your personal information.

Please recognize that protecting your personal information is also your responsibility. We ask you to be responsible for safeguarding your password, secret questions and answers and other authentication information you use to access our Services.

6. Our Retention Periods

We will retain your personal information only for as long as is necessary in order to fulfill the purposes for which it was collected as noted in Sections 3 and 9(b). We may retain some of your personal information for a longer period insofar as it may be necessary to defend or prosecute any legal claim(s).

Generally, your personal information is held from the date you create your account for as long as the Services exist. If you are a Virginia or California resident and you request account deletion, we will delete or deidentify your associated account data so that it no longer directly identifies you.

If you send us correspondence, including emails and faxes, we retain such information electronically in the records of your account. We will also electronically retain customer service correspondence and other correspondence from Castrol to you. We retain these records to measure and improve our customer service and to investigate potential fraud and violations. We may, over time, delete these records, as permitted by law.

7. Children

Our Services are not directed to, and we do not knowingly collect personal information from children under the age of 18. If you are under 18, please do not attempt to fill out our forms or send any personal information about yourself to us. If we become aware that a child under 18 has provided us with personal information, we will take steps to delete such information from our files.

8. Third Party Links

The Castrol Sites may provide links to third-party websites for your convenience and information. If you access those links, you will leave the Castrol Sites. Castrol does not control those sites or their privacy practices, which may differ from Castrol's. We do not endorse or make any representations about third-party websites. The Castrol Policy does not cover the information you choose to give to unrelated third parties. We encourage you to review the privacy policy of any company before submitting your personal information. Some third-party companies may choose

to share their personal data with Castrol; that sharing is governed by that third-party company's privacy policy.

9. Notice for California Residents

Last Updated: January 1, 2023

This section applies only to California residents and does not apply to personal information collected about Castrol personnel, job applicants or business partners. This section uses certain terms that have the meanings given to them in the California Consumer Privacy Act of 2018 (as amended by the California Privacy Rights Act of 2020) and its implementing regulations (collectively, the "CCPA"). For more information about the personal information we collect and how we collect it, please refer to sections 1 and 2 above.

a. Personal information Categories We Collect

We may collect (and may have collected during the 12-month period prior to the Last Updated date of this section 12) the following categories of personal information when you use our Services:

- identifiers such as a name, address, unique personal identifier, online identifier, email, account name, phone number, your device's IP address, software, and identification numbers associated with your devices;
- commercial information such as records of products or services purchased, obtained, or considered by you;
- **online activity**, such as internet or other electronic information regarding your browsing history, search history, the webpage visited before you came to our Site, length of visit and number of page views, click-stream data, locale preferences, your mobile carrier, date and time stamps associated with transactions, and system configuration information;
- **sensory information**, such as audio recordings of your voice to the extent you call us, as permitted under applicable law; and
- inferences about your preferences, characteristics, behavior and attitudes.

We generally do not collect protected classifications about our users, biometric information, professional or employment-related information, or education-related information. For more information about the personal information we collect and how we collect it, please refer to sections 1 and 2 above.

b. <u>Purposes for Processing personal information</u>

We may use (and may have used during the 12-month period prior to the Last Updated date of this section 12) your personal information for the business purposes described in section 3 and for the following business purposes:

- Performing services, maintaining or servicing accounts, providing customer service and verifying customer information;
- Providing advertising and marketing services:
- Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance;
- Short-term, transient use, such as nonpersonalized advertising shown as part of your current interaction with us;
- Helping to ensure security and integrity;
- Undertaking activities to verify or maintain the quality or safety of our services or devices and to improve, upgrade, or enhance them;
- Debugging to identify and repair errors; and
- Undertaking internal research for technological development and demonstration.

- c. <u>Retention of personal information.</u> We will retain your personal information in accordance with section 6 above, but in no case longer than the time period reasonably necessary to achieve the purposes described in section 3 and section 12(b), or any other notice provided at the time of collection, taking into account applicable statutes of limitation and records retention requirements under applicable law.
- d. <u>Sources of personal information.</u> We may obtain your personal information from the following sources:
 - Directly from you, such as when you register on the Castrol Site, when you contact us at by email, when you call us, when you use any of our social media channels, when you utilize the "mail-in free method" to register for a promotion or our sweepstakes
 - Your devices, such as when you use our Services
 - Our affiliates and subsidiaries
 - Service providers, contractors and other vendors who provide services on our behalf
 - Our joint marketing and business partners
 - Online advertising services
 - Data analytics providers
 - Operating systems and platforms
 - Social networks
- e. <u>Sale or sharing of personal information.</u> We do not sell your personal information in exchange for monetary compensation. We may share your personal information by allowing certain third parties who may also be our service providers (such as online advertising services and social networks) to collect personal information via automated technologies on our Services for social networking and cross-context behavioral advertising purposes. This kind of sharing, to third parties who are not our service providers, may be considered a "sale" under California law when the personal information is exchanged for non-monetary consideration. You have the right to opt out of these types of disclosures of your information.

We may sell or share for cross-context behavioral advertising purposes (and may have sold or shared during the 12-month period prior to the Last Updated date of this section 0), the following categories of personal information about you to online advertising services and social networks:

- Identifiers
- Commercial information
- Online activity
- Inferences

You have the right to opt-out of this disclosure of your information, as detailed below. We do not have actual knowledge that we sell or share the personal information of minors under 16 years of age.

f. <u>Disclosure of personal information.</u> During the 12-month period prior to the Last Updated date of this section 9, we may have disclosed the following categories of personal information about you for a business purpose to the following categories of third parties:

Categories of personal information	Categories of Third Parties
Identifiers	Our affiliates and subsidiaries
	Vendors who provide services on our behalf
	Our joint marketing and business partners
	 Professional services organizations, such as
	auditors and law firms
	Data analytics providers

Internet service providers
Operating systems and platforms
Online advertising services and advertising networks
Social networks
 Co-sponsors of contests, sweepstakes or other promotions
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Our affiliates and subsidiaries
Vendors who provide services on our behalf
Our joint marketing and business partners
Professional services organizations, such as
auditors and law firms
Data analytics providers
Internet service providers
Operating systems and platforms
Online advertising services and advertising
networks
Social networks
Co-sponsors of contests, sweepstakes or other
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Our joint marketing and business partners
Professional services organizations, such
auditors and law firms
Data analytics providers
Internet service providers]
Operating systems and platforms]
Online advertising services and advertising
networks
Social networks
Co-sponsors of contests, sweepstakes or other
promotions
Our affiliates and subsidiaries
Vendors who provide services on our behalf
Our affiliates and subsidiaries
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Our affiliates and subsidiaries
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 Our affiliates and subsidiaries Vendors who provide services on our behalf Professional services organizations, such as auditors and law firms
 Our affiliates and subsidiaries Vendors who provide services on our behalf Professional services organizations, such as auditors and law firms Data analytics providers
 Our affiliates and subsidiaries Vendors who provide services on our behalf Professional services organizations, such as auditors and law firms

Social networks

- g. <u>California Consumer Privacy Rights.</u> You have certain choices regarding your personal information, as described below:
 - Access: You have the right to request, twice in a 12-month period, that we disclose to you the personal information we have collected, used, disclosed, and sold or shared about you.
 - Correction: You have the right to request that we correct the personal information we maintain about you, if that information is inaccurate.
 - Deletion: You have the right to request that we delete certain personal information we have collected from you.
 - Opt-Out of Sale or Sharing: You have the right to opt-out of the sale of your personal information or the sharing of your personal information for cross-context behavioral advertising purposes.
 - Shine the Light Request: You also may have the right to request that we provide you with (a) a list of certain categories of personal information we have disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year and (b) the identity of those third parties.
- h. <u>How to Submit a Request.</u> To submit an access, correction or deletion request please contact us by phone at 1-888-CASTROL or by email at contactus@bp.com. To opt out of the sale or sharing of your personal information, click here. To submit a request as an authorized agent on behalf of a consumer, please contactus@bp.com with the subject line "Authorized Agent Request". To submit a Shine the Light request, please contact us as contactus@bp.com. In your request, please specify in the subject line "Shine the Light Request."
- i. <u>Verifying Requests.</u> To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your personal information or complying with your deletion or correction request. If you have an online account with us, we may verify your identity by requiring you to sign into your account. If you do not have an online account with us and you request access to, correction of or deletion of your personal information, we may require you to authenticate your email address on record with us or to provide information about your transactions or prior interactions with us. In addition, if you ask us to provide you with specific pieces of personal information, we may require you to sign a declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request.
- j. <u>Additional Information</u>. If you choose to exercise any of your rights under the CCPA, you have the right to not receive discriminatory treatment by us. To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request.

k. Notice of Financial Incentive:

Castrol provides certain benefits to consumers in connection with their disclosure of personal information to Castrol. Such benefits may include offers special promotions, giveaways, and sweepstakes.

To participate in the Program, we require your first and last name, email address, phone number, and information on your motor oil and vehicle. When you register through the Site, you also may provide a credit card number, debit card number or other financial information. We also collect the categories of personal information mentioned in Sections 1 and 9(a) above in connection with your participation in the Services.

During registration, you must first consent to the Conditions of Use and create an account on our Site. You may withdraw from the Program at any time by contacting us at contactus@bp.com.

The Services offers certain financial incentives (including special promotions, giveaways, and sweepstakes) in exchange for the collection, retention, and the potential sale and sharing of the personal information we require for your participation in the Services. The special promotions, giveaways, and sweepstakes offered in connection with the Services, are reasonably related to our good faith estimate of the value provided to bp by your personal information. We estimate that the value to Castrol of the personal information you provided to facilitate participation in the Services is reasonably related to the financial incentives less the expenses related to offering these financial incentives

To assert your right to know or your right to delete your personal information, please contact us at contactus@bp.com or by phone at 1-888-CASTROL. To verify your identity, we may ask you to verify personal information we already have on file for you. If we cannot verify your identity from the information we have on file, we may request additional information from you, which we will only use to verify your identity, and for security or fraud-prevention purposes.

10. How to Contact Us

If you have questions or concerns relating to the handling of your personal information, please contact us by email at contactus@bp.com. You can also contact us by mail at BP Lubricants USA Inc., Attn: Privacy Matters, 1500 Valley Road, Wayne, New Jersey 07470, United States.