



PRIVACY STATEMENT

Welcome to the Castrol U.S. website. Castrol is owned and operated by BP Lubricants USA Inc. (collectively, "BP", "we" or "us" or "our"). BP 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/> and all corresponding webpages and websites that link to this Policy ("Site"); BP mobile, web, console, desktop and other applications (e.g., Apple iOS Apps, etc.) (collectively and individually, "BP App"); and any other content, applications, features, functionality, information and services offered by us through the Site and/or the BP Apps.

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 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.

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, or using any features on the Site such as the Live Chat, we need your email address, name and other limited personal identifiers, typically name, address and contact number. If you chose to purchase information, goods, products or services, we will usually 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 That We Collect Automatically

When you use the Services online or through our mobile app, we automatically collect information about the Services you use and how you use them by using cookies, tags, and similar technologies to automatically collect information in connection with our Services. To learn more about our usage of the cookies and other tracking technologies, please see section 2 below.

c. 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 BP.

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. Cookies. 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.

c. Your Choices. 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>.

d. **Do Not Track.** Some Internet browsers, such as Internet Explorer, Firefox, and Safari, include the ability to transmit “Do Not Track” or “DNT” signals. Since uniform standards for “DNT” signals have not been adopted, our Sites do not currently process or respond to “DNT” signals.

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. To Provide You Our Services

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.

Sharing of Your Personal Information

We may disclose your Personal Information as described below.

a. Within Our Corporate Organization

BP is a part of a corporate organization that has many legal entities, business processes, management structures and technical systems. BP may share your Personal Information within this organization in order to provide you with the Services and take actions based on your request. Except as set out above, we will not pass your details to anyone else outside the BP organization without your permission. Since BP operates globally, the information you submit may be transferred outside of the US. This and all other transmissions will remain secure and under our control. By clicking the 'I accept' button where you offer your information in return for information, goods, products and services, you consent to such a transfer.

b. Third Parties

We may appoint third-party service providers to assist us in providing you with the information, goods, products and Services you request. In these circumstances, we will take steps to ensure that your Personal Information is held in strict accordance with our Policy and is only used for the purpose of fulfilling your request.

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 BP. 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.

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.

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. 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.

Children

Castrol is committed to protecting the privacy needs of children and we encourage parents and guardians to take an active role in their children's online activities and interests. Castrol does not knowingly collect information from children under the age of 16 and Castrol does not target its Sites to children under 16.

Security

We have implemented security policies, rules and technical measures to protect the Personal Information that we have under our control that complies fully with data privacy & protection legislation appropriate to the jurisdiction applicable to the Site. The security measures are designed to prevent unauthorized access, improper use or disclosure, unauthorized modification and unlawful destruction or accidental loss.

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 website. 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.

Access to Your Personal Data

To inquire about accessing your Personal Information please email us at lubesmarketing@castrol.com. We will provide you with a readable copy of the Personal Information that we keep about you, within 40 days, although we will require proof of your identity before disclosing that data. We allow you to challenge the data that we hold on you and, where appropriate, you may have the data: erased, rectified, amended or completed. We reserve the right to refuse to provide our visitors with a copy of their Personal Information, but will give reasons for our refusal. You will be able to challenge our decision to refuse to provide you with a copy of your Personal Information.

Disclosure and Visitor Choice

You may unsubscribe or opt-out of services at any time, details of how to opt-out vary between Castrol Sites, but generally it is a simple process. We indicate the means to opt-out either at the point when your Personal Information is collected or ask you to send us an email to lubesmarketing@castrol.com.

Notice for California Residents

This section applies only to California residents. Pursuant to the California Consumer Privacy Act of 2018 ("CCPA"), below is a summary for the last twelve (12) months of the Personal Information categories, as identified and defined by the CCPA (see California Civil Code section 1798.140 (o)), that we collect, the reason we collect the Personal Information, where we obtain the Personal Information, and the third parties that we may share the Personal Information.

a. Personal Information Categories We Collect

We generally collect the following categories of Personal Information about you when you use our Services:

- identifiers such as a name, address, unique personal identifier, email, 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;
- Internet or other electronic information regarding you 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;

- your geolocation, to the extent you have configured your device to permit us to collect such information;
- 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. Purposes for Processing Personal Information

We collect your Personal Information for the business purposes described in section 3. The CCPA defines a “business purpose” as the use of Personal Information for the business’s operational purposes, or other notified purposes, provided the use of Personal Information is reasonably necessary and proportionate to achieve the operational purpose for which the Personal Information was collected or another operational purpose that is compatible with the context in which the Personal Information was collected.

The following activities are considered “business purposes” under the CCPA: auditing related to a current interaction with the consumer and concurrent transactions, and auditing compliance with laws and other standards; detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity; performing services on behalf of the business, including maintaining or servicing accounts, providing customer service, verifying customer information; repairing errors that impair existing intended functionality; Internal research for technological development; verifying or maintaining the quality or safety of, and improving, upgrading, or enhancing, a service or device that is owned, manufactured by, manufactured for, or controlled by the company.

c. Third Party Sharing

The categories of third parties with whom we may share your Personal Information are listed above in section 4, above.

d. Privacy Rights

If you are a California resident, you have rights in relation to your Personal Information; however, your rights are subject to certain exceptions. For instance, BP cannot disclose specific pieces of Personal Information if the disclosure would create a substantial, articulable, and unreasonable risk to the security of the Personal Information, your account with us or the security of our network systems.

- Right Against Discrimination. You have the right not to be discriminated against for exercising any of the rights described in this section. We will not discriminate against you for exercising your right to know, delete or opt-out of sales.
- Right to Know. You have the right to request in writing: (i) a list of the categories of personal information, such as name, address, e-mail address, that a business has disclosed to third parties during the immediately preceding calendar year for the third parties' direct marketing purposes, and (ii) the names and addresses of all such third parties. In addition, you have the right to request: (i) the categories of personal information we have collected about you, (ii) the categories of sources from which personal information is collected, (iii) the business or commercial purpose for the information collection, (iv) the categories of third parties with whom we have shared personal information, and (v) the specific pieces of personal information we hold about an individual. You have the right to request a copy of the specific Personal Information we collected about you during the 12 months before your request.
- Right to Delete. You have the right to request us delete any Personal Information we have collected from you or maintain about you, subject to certain exceptions.

To assert your right to know or your right to delete your Personal Information, please contact us as lubesmarketing@castrol.com or by phone at 1-800-462-0835. 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.

- **Right to Opt-Out of Selling.** You have the right to opt-out of having your Personal Information sold. We do not sell your Personal Information. The CCPA broadly defines “personal information” and “selling” such that to the extent we share identifiers linked to you with a third party for a benefit may be considered a sale. In 2019, we were sharing identifiers and inferences about you with our partners, third parties and affiliates in such a way that, under the CCPA, may be defined as selling. As noted above, you have the right to know the categories of Personal Information that we sold about you and the categories of third parties with whom we shared such information.

e. **Additional Rights**

California residents who provide Personal Information in obtaining products or services for personal, family, or household use may request a notice from us describing what categories of Personal Information (if any) we have shared with third parties, including our corporate affiliates, for direct marketing purposes during the preceding calendar year. You may request such notice once a year and free of charge. To request a notice, please contact us at lubesmarketing@castrol.com. In your request, please specify that you want a “California Shine the Light Request.”

In addition, a business subject to California Business and Professions Code Section 22581 must allow California residents under age 18 who are registered users of online sites, services or applications to request and obtain removal of content or information they have publicly posted. Your request should include a detailed description of the specific content or information to be removed. Please be aware that your request does not guarantee complete or comprehensive removal of content or information posted online and that the law may not permit or require removal in certain circumstances.

How to Contact Us

If you have questions or concerns relating to the handling of your Personal Information, please contact us by email at lubesmarketing@castrol.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.