

Privacy Policy

Activ Energy Chemicals, Inc. · activenergy.com · nanoActiv.com · nanoactivu.com

We take your privacy very seriously. Please read this Privacy Policy carefully as it contains important information on who we are and our information practices, meaning how and why we collect, use, disclose, sell, share, store, and retain your personal information. It also explains your rights in relation to your personal information and how to contact us in the event you have a complaint or request.

Scope of this policy. This Privacy Policy applies to the websites located at **activenergy.com**, **nanoActiv.com**, and **nanoactivu.com** (each a "Website" and together the "Websites"), to our related online services, customer and partner portals, and mobile or web-based applications, and to the personal information we collect in connection with the **Activ Energy** and **nanoActiv** brands under which we market our nanotechnology chemical solutions and related services for oil and gas producers. nanoActiv® is a registered trademark of Nissan Chemical America Corporation, used by us with permission. References in this policy to nanoActiv, the nanoActiv brand, or the nanoActiv.com and nanoactivu.com Websites are to products, services, and online properties operated and offered by Activ Energy Chemicals, Inc. under that licensed brand. This policy governs personal information collected and processed by Activ Energy Chemicals, Inc. and does not apply to any separate website or service operated by Nissan Chemical America Corporation or its affiliates.

We collect, use, and are responsible for certain personal information about you. For California consumers, we are subject to the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act of 2020 (CPRA), and we are responsible for your personal information as a "business" under the CCPA/CPRA. Depending on where you are located, other privacy and data protection laws may also apply to our processing of your personal information, and we will comply with those laws to the extent they apply.

1. Key Terms

It would be helpful to start by explaining some key terms used in this Privacy Policy:

Term	Meaning
We, us, our	Activ Energy Chemicals, Inc., a Delaware corporation, which operates the activenergy.com , nanoActiv.com , and nanoactivu.com Websites and markets its nanotechnology chemical solutions and related services under the Activ Energy and nanoActiv brands
Websites (or Sites)	The websites located at activenergy.com , nanoActiv.com , and nanoactivu.com , together with any related customer or partner portals and any mobile or web-based applications that we operate
nanoActiv®	A registered trademark of Nissan Chemical America Corporation, used by Activ Energy Chemicals, Inc. with permission. References in this policy to nanoActiv, the nanoActiv brand, or the nanoActiv.com and

Term	Meaning
	nanoactivu.com Websites refer to products, services, and online properties operated and offered by Activ Energy Chemicals, Inc. under that licensed brand
Data Protection Contact	General Counsel, Activ Energy Chemicals, Inc. Activ Energy Chemicals, Inc., Attn: General Counsel, 12 N. Cheyenne, Tulsa, Oklahoma 74103 email: privacy@activenenergy.com
Personal information	Any information relating to an identified or identifiable individual
Special category personal information	Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs, or trade union membership; genetic and biometric data; and data concerning health, sex life or sexual orientation.
Sensitive Personal Information	Personal information revealing a consumer's social security number, driver's license and passport numbers, account numbers and credentials, precise geolocation, racial or ethnic origin, religious beliefs, or union membership, personal information concerning a consumer's health, sex life, or sexual orientation, contents of a consumer's mail, email and text messages where the business is not the intended recipient, genetic data, biometric information, or citizenship and immigration status.

2. Personal Information We Collect About You

We may collect and use the following personal information, including sensitive personal information, that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household:

Categories of Personal Information	Specific Types of Personal Information Collected
Identifiers (e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers)	Name, business title, employer name, business postal address, business email address, business telephone number, mobile telephone number, online identifiers such as IP address, device identifiers, cookie IDs, account usernames for any customer or partner portals, and any identifiers you choose to provide when you contact us (for example, via web forms, email, or telephone).
Information that identifies, relates to, describes, or is capable of being associated with, a particular individual...	Business contact details (such as name, business address, business email address, and business telephone number), information about your role and responsibilities within your company, information about your purchasing history and preferences relating to our nanotechnology chemical solutions for oil and gas production, records of communications with us, and any other information you choose to provide. We do not

Categories of Personal Information	Specific Types of Personal Information Collected
	intentionally collect consumer banking, credit card, debit card, or medical/health insurance information, except to the extent necessary to process payments from business customers through our payment service providers.
Account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account	Usernames, hashed passwords, and other credentials used to access any Activ Energy Chemicals, Inc. customer or partner portals (including those provided under the Activ Energy and nanoActiv brands); limited payment card or bank account information processed through our third-party payment processors for invoicing and settlement of orders. We do not directly store full payment card numbers together with security codes on our own systems.
Characteristics of protected classifications under California or federal law	We do not intentionally collect characteristics of protected classifications (such as age, sex, race, national origin, disability, or veteran status) in connection with our nanotechnology chemical solutions for oil and gas producers, other than where you may voluntarily provide such information in an employment application or CV submitted through our Websites or to our recruiting team.
Commercial information	Records relating to quotations requested from us, nanotechnology chemical solutions and related products or services for oil and gas production that you or your company have purchased, obtained, or considered, order histories, delivery information, technical support requests, contract details, and information about how you or your company use our solutions, Websites, or apps.
Biometric information	We do not intentionally collect or use biometric information in the ordinary course of providing our nanotechnology chemical solutions or operating our Websites or apps.
Internet or other electronic network activity information	Log data about your visits to and use of our Websites and any mobile or web-based applications (including IP address, browser type, device type, operating system, dates and times of access, pages viewed, links clicked, referring/exit pages), search queries, and information about your interactions with our emails, online content, and advertisements, collected via cookies, pixels, tags, software development kits (SDKs), and similar technologies.
Geolocation data	Approximate location information derived from your IP address or device settings when you access our Websites or apps, which may indicate the city, region, or country in which your device is located. We do not use precise geolocation (for example, GPS-level location) in our consumer-facing services.
Audio, electronic, visual, thermal, olfactory, or similar information	Call recordings of customer service or technical support calls where permitted by law, recordings of webinars, training

Categories of Personal Information	Specific Types of Personal Information Collected
	sessions, or events that you attend or participate in, and CCTV footage captured at our physical offices or facilities.
Professional or employment-related information	Information about your professional role and qualifications, such as your job title, function, department, employer, area of technical expertise (for example, production engineering, reservoir engineering, or operations), professional licenses or certifications, and employment history and qualifications if you submit a CV or job application to us.
Education information	Education history such as degrees obtained, institutions attended, fields of study, professional training, and certifications, but only where you choose to provide such information to us (for example, in a CV, job application, or professional profile). We do not maintain education records on behalf of educational institutions.
Inferences drawn from any of the information identified above...	Inferences we derive about your or your company's potential interests in particular nanotechnology chemical solutions for oil and gas production, preferred communication channels, likelihood of responding to particular offers, and other marketing-related preferences, derived from your interactions with our Websites, apps, emails, and our sales and technical teams. We do not create inferences about sensitive characteristics such as health, race, or political opinions.
Racial or ethnic origin, religious or philosophical beliefs, union membership, or citizenship or immigration status	We do not intentionally collect information about your racial or ethnic origin, religious or philosophical beliefs, trade union membership, or detailed citizenship or immigration status in connection with our products and services, other than where required under applicable employment or immigration law in the context of recruitment or employment (for example, right-to-work checks).
Contents of a consumer's mail, email, and text messages...	We collect and process the contents of emails, messages, and other communications that you send directly to Activ Energy Chemicals, Inc. (including through the Activ Energy and nanoActiv brands). We do not access the contents of your mail, email, or text messages where we are not the intended recipient.
Genetic data	We do not collect or process genetic data in connection with our products, services, Websites, or apps.
Processing of biometric information to uniquely identifying a consumer	We do not use biometric identifiers (such as fingerprints, facial recognition, or voiceprints) to uniquely identify you in connection with our Websites, apps, or customer portals.
Health information	We do not intentionally collect medical or health information about you in connection with our nanotechnology chemical solutions, other than limited information that may be required for health and safety, incident reporting, or occupational health

Categories of Personal Information	Specific Types of Personal Information Collected
	purposes for employees, contractors, or site visitors, where permitted or required by law.
Sex life or sexual orientation	We do not collect information about your sex life or sexual orientation in connection with our products, services, Websites, or apps.

If you do not provide personal information required to provide our nanotechnology chemical solutions and related services for oil and gas producers to you or your company, it may delay or prevent us from providing those solutions and services to you.

3. How Your Personal Information is Collected

We collect personal information from the following categories of sources:

- You, directly in person, by telephone, text, or email, and via our Websites and any customer or partner portals or mobile applications that we operate
- Third party with your consent (e.g., your bank)
- Advertising networks
- Internet service providers
- Data analytics providers
- Government entities
- Operating systems and platforms
- Social networks
- Data brokers
- Publicly accessible sources (e.g., property records)
- Cookies on our Websites
- Our IT and security systems, including:
 - Door entry systems and reception logs
 - Automated monitoring of our Websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email, and instant messaging systems –and–
 - Laboratory information management systems, safety and incident reporting systems, and other operational systems used in connection with our nanotechnology chemical solutions and related facilities

4. Cookies, Pixels, and Other Tracking Technologies

When you visit or use our Websites or other online services, we and our partners use cookies, pixels, tags, scripts, software development kits (SDKs), and similar tracking technologies

("cookies" or "tracking technologies") to collect information about your device and your interactions with our services and online content.

These tracking technologies may be set by us (first-party cookies) or by third parties (third-party cookies) and are used for the following purposes:

Strictly necessary cookies that are required for our Websites to function properly, to enable core features (such as page navigation, access to secure areas, and form submissions), and to protect the security of our services.

Performance, analytics, and measurement cookies that help us understand how visitors use our Websites (for example, which pages are visited and which links are clicked), so that we can improve our Websites, services, and marketing campaigns.

Advertising and targeting cookies, pixels, and similar technologies that enable us and our advertising and analytics partners to recognize your device over time and across websites and apps, to measure the effectiveness of our marketing, and to show you ads that may be more relevant to your interests (also sometimes referred to as "interest-based" or "cross-context behavioral" advertising).

Under the CCPA/CPRA, our use of certain advertising, analytics, and social media cookies and pixels may constitute the "sharing" of your personal information for cross-context behavioral or targeted advertising. You can manage your cookie and tracking technology preferences (other than strictly necessary cookies) at any time by using the cookie banner or cookie preference center that appears when you first visit either of our Websites (and is available via the "cookie settings" link in the footer of each Website). You may also exercise your right to opt-out of the sale or sharing of your personal information, including in connection with our use of advertising and analytics cookies and pixels, by visiting the homepage of either of our Websites and clicking the "Do Not Sell or Share My Personal Information" link, or by going directly to <https://www.activenergy.com/do-not-sell-or-share-my-personal-information>.

You can also configure your browser or device to refuse or disable cookies or to alert you when cookies are being sent. We will also honor Global Privacy Control (GPC) or similar opt-out preference signals sent by your browser as a valid request to opt out of the sale or sharing of your personal information, as required by applicable law. Please note that if you disable or refuse cookies, some parts of our Websites may become inaccessible or may not function properly.

5. How and Why We Use Your Personal Information

We use your personal information for business and operational purposes, including to provide and improve our products and services, to communicate with you, to comply with our legal and regulatory obligations, to protect our rights and the rights of others, and for other purposes described in this Privacy Policy or at the time of collection.

The table below explains what we use (process) your personal information for and our reasons for doing so:

What we use your personal information for	Our reasons
To provide our nanotechnology chemical solutions and related technical, commercial, and support services to you or your company	To operate our business, provide our products and services, and respond to your requests or instructions
To prevent and detect fraud against you or Activ Energy Chemicals, Inc.	To protect our company, our customers, and others by minimizing fraud and other harmful or unlawful activity
Conducting checks to identify our customers and verify their identity; Screening for financial and other sanctions or embargoes; Other processing necessary to comply with professional, legal, and regulatory obligations	To comply with our legal and regulatory obligations
Gathering and providing information required by or relating to audits, inquiries, or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, e.g., policies covering security and internet use; Operational reasons, such as improving efficiency, training, and quality control	To enforce and administer our internal policies and procedures so that we can deliver services effectively and responsibly; To improve how we operate and to help ensure we can provide high-quality services at competitive prices
Ensuring the confidentiality of commercially sensitive information	To protect our trade secrets and other commercially valuable information from unauthorized access, use, or disclosure; To comply with our legal and regulatory obligations
Statistical analysis to help us manage our business	To understand and manage our business performance and plan for the future
Preventing unauthorized access and modifications to systems	To detect, prevent, and respond to security incidents and other potentially harmful or unlawful activity; To comply with our legal and regulatory obligations
Updating customer records	To maintain up-to-date and accurate records so that we can administer our relationship with you or your company; To comply with our legal and regulatory obligations; To manage our customer relationships
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations; To manage our workforce and operations effectively so that we can deliver services safely and efficiently
Marketing our nanotechnology chemical solutions and related services	To promote and grow our business, including by informing existing and potential customers about our products and services

What we use your personal information for	Our reasons
Credit reference checks via external credit reference agencies	To assess credit risk and help ensure that customers are able to pay for our products and services
External audits and quality checks, e.g., for ISO or Investors in People accreditation and the audit of our accounts	To maintain certifications and demonstrate that we operate our business to recognized standards; To comply with our legal and regulatory obligations

6. Promotional Communications

We may use your personal information to send you updates (by email, text message, telephone, or post) about our nanotechnology chemical solutions and related services for oil and gas producers, including exclusive offers, promotions or new products and services.

In many cases, we rely on our business relationship with you to send you promotional communications about our products and services. Where applicable law requires your consent for certain types of marketing communications, we will request that consent separately and clearly.

We will always treat your personal information with the utmost respect and we do not sell your personal information to third parties for monetary consideration or share it with other organizations outside of Activ Energy Chemicals, Inc. for their own direct marketing. However, as described in the "Cookies, Pixels, and Other Tracking Technologies" and "Personal Information We Sold or Shared" sections, we may allow certain third-party advertising, analytics, and social media partners to collect or receive information about your online activity on our Websites (for example, via cookies and pixels) so that they can help us deliver more relevant ads, measure campaign performance, or provide analytics services. Under the CCPA/CPRA, this type of activity may be considered a "sale" or "sharing" of your personal information for cross-context behavioral or targeted advertising, and you have the right to opt-out of such sale or sharing as described below.

You have the right to opt-out of receiving promotional communications at any time and, for California consumers, to opt-out of the sale or sharing of your personal information for targeted or cross-context behavioral advertising. You can exercise these choices by:

- Contacting us at privacy@activenenergy.com
- Using the "unsubscribe" link in emails or "STOP" number in texts; visiting the homepage of either of our Websites and clicking the "Do Not Sell or Share My Personal Information" link, or going directly to <https://www.activenenergy.com/do-not-sell-or-share-my-personal-information>; or adjusting your preferences in our cookie banner or cookie preference center (accessible via the "Cookie Settings" link in the footer of each of our Websites) to disable advertising and analytics cookies and pixels.

We may ask you to confirm or update your marketing preferences if you instruct us to provide further nanotechnology chemical solutions or related services in the future, or if there are changes in the law, regulation, or the structure of our business.

7. Who We Share Your Personal Information With

We routinely share personal information with:

- Our affiliates, including companies within the Activ Energy Chemicals, Inc. group of companies
- Service providers we use to help deliver our nanotechnology chemical solutions and related services to you, such as payment service providers, warehouses, and delivery companies
- Other third parties we use to help us run our business, such as marketing agencies or website hosts
- Third parties approved by you, including social media sites you choose to link your account to or third-party payment providers
- Credit reporting agencies
- Our insurers and brokers
- Our banks
- Other business partners and professional advisers, such as logistics providers, technical consultants, auditors, accountants, and legal advisers who support our operations

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers to ensure they can only use your personal information to provide services to us and to you. We may also share personal information with external auditors, e.g., in relation to ISO or Investors in People accreditation and the audit of our accounts.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. We will typically anonymize information, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

8. Personal Information We Sold or Shared

In the preceding 12 months, we have sold or shared the following categories of personal information to advertising networks, data analytics providers, and social media platforms for purposes of cross-context behavioral advertising and marketing analytics:

- Identifiers (e.g., name, online identifiers, Internet Protocol address, email address, cookie IDs, or other similar online identifiers)
- Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, their name, address, telephone number, employment, and employment history
- Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies)
- Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement)
- Geolocation data
- Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, behavior, and purchasing tendencies

9. Categories of Personal Information We Disclosed for a Business Purpose

In the preceding 12 months, we have disclosed the following categories of personal information for a business purpose:

- Identifiers (e.g., name, postal address, online identifiers, Internet Protocol address, email address, account name, or other similar identifiers)
- Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, their name, address, telephone number, education, employment, and employment history
- Characteristics of protected classifications under California or federal law
- Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies)
- Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement)
- Geolocation data
- Audio, electronic, visual, thermal, olfactory, or similar information
- Professional or employment-related information
- Education information, defined as information that is not publicly available personally identifiable information as defined in the FERPA
- **We do not have actual knowledge that we sell or share the personal information of consumers under 16 years of age.**

10. How Long Your Personal Information Will Be Kept

We will keep your personal information while you have an account with us or while we are providing our nanotechnology chemical solutions and related services to you or your company. Thereafter, we will keep your personal information for as long as is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf
- To show that we treated you fairly –or–
- To keep records required by law

We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information. Further details on this may be available in our internal records management policies and schedules.

When it is no longer necessary to retain your personal information, we will delete or anonymize it.

11. California Consumers: Your Rights Under the CCPA/CPRA

You have the right under the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act of 2020 (CPRA), and certain other privacy and data protection laws, as applicable, to exercise free of charge:

Right	Description
Disclosure of Personal Information We Collect About You	You have the right to know, and request disclosure of: the categories of personal information we have collected about you, including sensitive personal information; the categories of sources from which the personal information is collected; the categories of third parties to whom we disclose personal information, if any; the specific pieces of personal information we have collected about you.
Disclosure of Personal Information Sold, Shared, or Disclosed for a Business Purpose	In connection with any personal information we may sell, share, or disclose to a third party for a business purpose, you have the right to know: the categories of personal information about you that we sold or shared and the categories of third parties to whom the personal information was sold or shared; the categories of personal information that we disclosed about you for a business purpose and the categories of persons to whom the personal information was disclosed for a business purpose. You have the right to opt-out of the sale of your personal information or sharing of your personal information for the purpose of cross-context behavioral advertising.
Right to Limit Use of Sensitive Personal Information	You have the right to limit the use and disclosure of your sensitive personal information to the use which is necessary to perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services.
Right to Deletion	Subject to certain exceptions, on receipt of a verifiable request from you, we will delete your personal information from our records and direct our service providers and contractors to do the same.

Right	Description
Right of Correction	If we maintain inaccurate personal information about you, you have the right to request us to correct that inaccurate personal information.
Protection Against Retaliation	You have the right to not be retaliated against by us because you exercised any of your rights under the CCPA/CPRA.

12. How to Exercise Your Rights

The rights described in this Privacy Policy apply to personal information we collect about you through either of our Websites and our related services. If you would like to exercise any of your rights as described in this Privacy Policy (including any rights you may have under the CCPA/CPRA or other applicable privacy laws), you may do so directly or through an authorized agent. You can submit a request here: <https://www.activenergy.com/privacy-rights>. You may also email/write to us at privacy@activenergy.com or

Activ Energy Chemicals, Inc.
 Attn: General Counsel
 12 N. Cheyenne Ave.
 Tulsa, OK 74103

Please note that you may only make a CCPA/CPRA-related data access or data portability disclosure request twice within a 12-month period. We will respond to your verifiable request within 45 days of its receipt. If we require more time (up to an additional 45 days), we will inform you of the reason and the extension period in writing.

- If you choose to contact us directly by website, email, phone, or in writing, you will need to provide us with:
 - Enough information to identify you (e.g., your full name, address and customer or matter reference number)
 - Proof of your identity and address (e.g., a copy of your driving license or passport and a recent utility or credit card bill) –and–
 - A description of what right you want to exercise and the information to which your request relates
- We are not obligated to make a data access or data portability disclosure if we cannot verify that the person making the request is the person about whom we collected information or is someone authorized to act on such person's behalf.
- Any personal information we collect from you to verify your identity in connection with your request will be used solely for the purposes of verification.

13. Keeping Your Personal Information Secure

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorized way. We limit access to your personal

information to those who have a genuine business need to access it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

14. Changes to This Privacy Policy

This Privacy Policy was published on January 1, 2026 and last updated on June 9, 2026.

We may change this Privacy Policy from time to time – when we do, we will inform you via notices on our Websites or other means of contact such as email where appropriate.

15. How to Contact Us

Please contact us by post, email, or telephone if you have any questions about this Privacy Policy or the information we hold about you. If contacting us by telephone, please call **[TELEPHONE NUMBER TO BE INSERTED]**.

Our contact details are shown below:

Our contact details	Activ Energy Chemicals, Inc. Attn: General Counsel 12 N. Cheyenne Ave. Tulsa, Oklahoma 74103 privacy@activenenergy.com info@activenenergy.com
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16. Do You Need Extra Help?

If you would like this notice in another format (for example: audio, large print, braille) please contact us (see "How to contact us" above).

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