PRIVACY POLICY

Armstrong World Industries Limited and its subsidiaries (trading as Armstrong Ceiling Solutions) takes your privacy seriously and is committed to ensuring compliance with its legal obligations in this respect. Accordingly, set out below is a comprehensive summary of the details of how we handle your data as a user of our website and your rights as a data subject. We reserve the right to adapt the website content from time to time and will update you as soon as reasonably practical with any changes that may affect you in this respect.

Please also update any relevant changes to your personal data which may impact any services provided by us to you through this site.

DATA CONTROLLER AND CONTACT DETAILS

For the purposes of compliance with the General Data Protection Regulation and associated English law, details of the ACS organisation which is the controller (or organisations that are the joint controllers) of your personal data and how to contact them are set out in Annex 1.

All references to “ACS” in this Policy will be Armstrong World Industries Limited and the applicable (as per the website location) Armstrong Ceiling Solutions organisation as described in Annex 1.

INTERNATIONAL DATA TRANSFERS

If the United Kingdom leaves the EU, your data will from that point effectively be transferred outside of the European Union (“EU”) to Armstrong Ceiling Solutions Limited in the UK. It will be adequately safeguarded through EU Approved Standard Contractual Clauses (“Standard Clauses”) between ACS and its subsidiaries and where necessary its sub-processors (or in such other manner as is approved by the EU and UK government). In such case, a copy of the Standard Contractual Clauses can be provided by ACS upon request.

PERSONAL DATA AND PURPOSE OF PROCESSING

ACS collects your personal data in connection with the following purposes:
Forms

E-Mail Preference Centre

ACS requires details of your primary role and your email address which will be used solely for the purpose of sending you targeted marketing communications by email. Such communications may include information in relation to new product lines, product updates, details of current and future projects, quality and technical issues and a newsletter. In addition to your email address, you also have the option to provide your full name, company name, post code and the city where you live but this information is not mandatory.

ACS will not send you any information or materials unless you give your consent to opt in to email marketing by ticking the opt-in box and providing your email address. ACS will follow up your initial interest by sending an email to the address you provided requesting confirmation that you still wish to receive marketing information by clicking on a link provided in the email. ACS requires your primary role and email address in order to send the most relevant marketing information to you in the most time and cost efficient manner.

You can withdraw your consent and opt out of email marketing at any time via the unsubscribe link in all marketing email footers. You may also email us at webmaster@armstrongceilingsolutions.co.uk and request we opt you out of future email marketing.

Your data will be stored on behalf of ACS’s parent company, Armstrong Ceiling Solutions Limited on secure servers in its third party service providers’ data centres. The third party service providers are Enigma Interactive Limited, which is ACS’s website hosting provider and whose data centre is in the United Kingdom and Dotmailer Limited trading as Dotdigital, which processes the data by transmitting marketing communication emails using its software tools on ACS’s behalf and whose data is hosted on Microsoft Azure infrastructure in the Netherlands.

Your data will be retained by Enigma and Dotdigital on ACS’s behalf indefinitely whilst you continue to interact with ACS’s communications, but if there is no activity or interaction after eighteen months, for example by clicking on links, opening emails or visiting the site, or you choose to unsubscribe from marketing emails, the data will be deleted.

Contact Us

For any queries and requests relating to ACS’s products, including technical matters, you can complete the relevant Contact Form and the appropriate ACS resource will contact you to provide assistance. You will need to provide your full name, the name of your company (if applicable), email address, country and phone number.

You will also have the option to provide your post code and town or city, your role, the subject of your query, the project size (if applicable) and any additional comments you deem relevant, but this
information is not mandatory. You can also opt-in to email marketing in this section by ticking the opt-in box (see Email Preference Centre above)

It is in ACS’s legitimate interests to request this data in order to be able provide a response to your request (including providing follow up information as necessary) and to retain an accurate and up to date record of customer information and requirements for relationship management purposes. Without this data, ACS would not be able to respond or follow up in the most effective manner to your request.

Data provided under the Contact Forms is forwarded to an ACS internal mail system tool on a UK server for processing by a designated in-country business support team in order to respond to your request accordingly. ACS retains the data indefinitely.

The data is also backed up by Enigma for 24 months and by Dotdigital for 12 months on ACS’ behalf in their respective back-up datacentres in the United Kingdom and Ireland.

Sample Ordering

If you wish to order product samples or specifications online, you will need to provide your full name, email address, phone number, company name, street address, town/city, post code and country. You can also provide details of the project size (if applicable) and any other relevant comments but this data is not mandatory. You can also opt-in to email marketing in this section by ticking the opt-in box (see Email Preference Centre above)

The data provided is forwarded to an internal email address on a UK server for processing by a designated business support team in the most applicable location (in terms of geography) in order to deliver your order. In some countries in Europe, the details will also be provided to third party logistics companies who have responsibility for physical delivery of the samples.

ACS requires this data to perform its contractual obligation to deliver your samples or provide specifications. Without it, ACS cannot fulfil the order.

The data is also backed up by Enigma on ACS’ behalf in its datacentre in the United Kingdom for a period of twenty four months as a back up to the order and in the event of any subsequent queries received in relation to the samples or specification order.

My Armstrong

You can create your own My Armstrong account which will allow you to access and receive additional personalised information and tools relating to ACS products based on your role. The data submitted is also used to autofill other forms you may submit. You can also opt-in to email marketing in this section by ticking the opt-in box (see Email Preference Centre above)
Creation of a My Armstrong account is voluntary but, if you wish to use this service, you must provide your email address, full name and details of your role. The information provided will be used by ACS’s internal business support and technical sales teams to create a specific password protected account in your name.

You may also provide details of your company, full address and telephone number but this is not required to create an account.

It is in ACS’s legitimate interests to request this data as it provides its customers with a secure and optimised service in terms of customised product information and assistance. Without the mandatory data requested, ACS would not be able to create a secure password protected account.

The data is also backed up by Enigma on ACS’ behalf in its back-up datacentre in the United Kingdom for a period of twenty four months. Enigma on ACS’s behalf retains the data indefinitely whilst you continue to access the account or interact with ACS’s communications. If there is no activity after twenty four months and ACS has not modified the account in any way, the data will be deleted.

SYSTEMS/SERVICES

Customer Database

ACS has an archive customer database in the UK which serves as a repository for all project information, company information and contact details provided through the Forms section for the purpose of satisfying sample requests, issuing special price approvals, configuring products and publishing location details of third parties such as distributors and contractors on its UK website.

Use of Cookies

What is a Cookie?

A cookie is a text file that is stored on your computer or mobile device when you visit certain websites. The cookie allows the website to record your searches or preferences in order to improve the service of website visitors.

ACS’s use of Cookies

ACS automatically places cookies on the browsers or devices of all users of its site. You can configure your browser so that you are informed when cookies are being stored and only permit cookies in specific cases, prohibit the storage of cookies in some cases or in general, and ensure that cookies are deleted automatically when you close the browser. Note that deactivating cookies can limit the functionality of the website.
Why do we use Cookies?

ACS uses cookies to understand how you navigate around its website content and thereby improve your experience. By way of example, some cookies will remember your language or preferences meaning you do not have to make the same choices time and again. We also use cookies for geo-localization purposes to ensure you are on the most appropriate website for your location and to remember the answer provided.

We may employ the learnings of your behavior on our website(s) to serve you with targeted advertisements on third-party website(s) in an effort to “re-market” our products and services to you.

What types of Cookies do we use?

First and Third Party Cookies

We use both first and third-party cookies on our website.

First party cookies are issued from domains owned by ACS and are used for site functionality purposes including the identification of language and location preferences.

Please see the Third Party Cookies section below for information about these cookies.

Session Cookies

Session cookies are temporary cookies used to remember/manage your time spent progressing through the various areas of the website. Session cookies expire immediately you close the web browser.

Permanent Cookies

Permanent cookies are used as convenience features to improve your experience when you return to our site by remembering your preferences and analyzing your behavior from previous visits to ACS sites. This improves the website functionality not only for you but for other users. Permanent cookies remain on your browser or mobile device even after you close your browser or restart your computer.

Third Party Cookies

<table>
<thead>
<tr>
<th>Cookies</th>
<th>Description</th>
<th>Link to Privacy Policy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Magento 2 Commerce “out of the box”</td>
<td>The Magento 2 platform uses default cookies to understand how users arrive on our website(s) and how they engage with us on the website. The data is used to improve the user experience. Magento also uses cookies to understand the content with which you</td>
<td><a href="https://docs.magento.com/m2/ce/user_guide/stores/cookie-reference.html">https://docs.magento.com/m2/ce/user_guide/stores/cookie-reference.html</a></td>
</tr>
<tr>
<td><strong>GeoIP Redirect for Magento 2</strong></td>
<td>We will use the GeoIP Redirect for Magento 2 extension to apply IP based re-directs or 'GeoLocation' functionality. The module automatically determines visitors' location and redirects them to the correct ACS country website.</td>
<td><a href="https://amasty.com/geoip-redirect-for-magento-2.html">https://amasty.com/geoip-redirect-for-magento-2.html</a></td>
</tr>
<tr>
<td>---------------------------------</td>
<td>-------------------------------------------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td><strong>Google Analytics</strong></td>
<td>Google Analytics is used to understand how our media campaigns work and how you interact with our website in order to improve the user experience.</td>
<td><a href="https://tools.google.com">https://tools.google.com</a></td>
</tr>
<tr>
<td><strong>Google Tracking Cookies</strong></td>
<td>Google tracking cookies enable us to understand if you complete certain actions on our website(s) after you have seen or clicked through one of our adverts served via Google. Based on the content you have engaged with on our websites Google are able to deliver some targeted adverts across other Google partner websites.</td>
<td><a href="https://support.google.com">https://support.google.com</a></td>
</tr>
<tr>
<td><strong>Addthis</strong></td>
<td>AddThis is a service which allows ACS to easily share any of our pages to any of the dozens of social networks available.</td>
<td><a href="http://www.addthis.com">www.addthis.com</a></td>
</tr>
<tr>
<td><strong>Dotdigital Engagement Cloud</strong></td>
<td>Our relation marketing platform. All information contained is owned by ACS. Dotmailer acts as solely as service provider which is not allowed to transmit any information to third parties without express written consent.</td>
<td>n/a</td>
</tr>
<tr>
<td><strong>YouTube</strong></td>
<td>YouTube is a video sharing website. The platform may use cookies to optimize your viewing experience to watch videos on Armstrong’s sites.</td>
<td><a href="http://www.youtube.com">www.youtube.com</a></td>
</tr>
</tbody>
</table>

**How do I Reject and Delete Cookies?**

You can choose to reject or block all or specific types of cookies by changing your preferences for ACS websites and/or the websites of any third party suppliers by changing your browser settings. If you do not
wish cookies to be used, you may need to actively delete or block the cookies. If you reject the use of cookies, you will still be able to visit our websites, but some of the functions may not work correctly.

**Web Site Access/Server Log Files**

Enigma, ACS’s third party website hosting provider, automatically collects and stores information in web site access logs that your web browser automatically provides Enigma with on ACS’s behalf for the purpose of site security.

These are:

- Type of web browser/browser version
- Operating system
- Referrer URL (Web Address or Web Site Location)
- Host name of your accessing computer
- Time of server request

This data is anonymous and is not automatically linked to any other source of information. However, in the event that the site is subject to unlawful use or interference (such as a cyber attack or hacking), we reserve the right to attempt to identify the party responsible through verifying the data captured on the server log files combined with any other relevant sources of data.

**Data Security**

We have implemented technical and organisational security measures to protect your data, particularly against loss, manipulation or unlawful access. We regularly update our security measures in line with new technical developments.

**Rights of Data Subjects**

**Core Individual Rights**

Please note that the following rights are available to you in connection with all processing of your personal data:

*Right of Access*

You may seek confirmation as to whether your personal data is processed by ACS and we will provide you with information concerning the use of such data and a copy of the personal data processed.

*Right of Rectification of Inaccurate Data*

Any personal data which is inaccurate or incomplete must be rectified by ACS and, if so requested, we will provide you with a statement showing the changes.

*Right of Erasure or the Right to be Forgotten*

You have the right to have your personal data erased by ACS where processing it is no longer necessary in relation to the original purpose for which it was collected or where you have objected to direct marketing.
or it has been unlawfully processed or where we are required to erase it to comply with a legal obligation applicable under the laws of England and Wales or EU law.

**Right of Restriction of Processing**

In the event that:

- you contest the accuracy of any personal data ACS processes about you, you may require that further processing of such data is restricted pending verification of the accuracy of the data
- processing is unlawful, you may request restriction of further data processing as opposed to erasure
- ACS requires your personal data in order to establish, bring or defend a legal claim even though it no longer requires the data for its original purpose, you may request that the processing is restricted pending final resolution of the claim.

**Conditional Rights**

**Erasure**

Where ACS processes your data based on explicit consent, if you withdraw that consent and ACS has not relied on any other legal ground for processing (see section on personal data and purpose of processing), you have the right to request erasure of that data.

**Data Portability**

If ACS processes personal data based on your consent or in order to enter into a contract with you, you may obtain that personal data directly from ACS in any structured, commonly used, machine readable format or indirectly by us providing it to any third party you choose to nominate.

**Objection to Processing**

You may object to further processing of your personal data where we have relied on the ground of legitimate interests unless ACS can demonstrate compelling grounds to continue such processing which override your individual interests, rights and freedoms.

Pending verification of the latter, you may obtain restriction of further processing and, in the event that ACS cannot successfully demonstrate compelling legal grounds to continue processing, ACS will erase the personal data.

**General**

If you believe any of your rights have been breached in connection with processing of your personal data, you have the right to lodge a complaint with a supervisory authority of any Member State of the EU, in particular in the Member State where you have your habitual residence or place of work or where the alleged breach took place.

If you have any questions in relation to this Privacy Policy or processing of your personal data generally or if you have any requests for information or suggestions or wish to make a complaint, please do not hesitate to make contact via [webmaster@armstrongceilingsolutions.co.uk].
Annex 1
Data Controllers and Contact Details

For any questions relating to the website and your rights in relation to how ACS uses your personal data, please go to webmaster@armstrongceilingsolutions.co.uk and an appropriate ACS representative will be in contact as soon as possible.

<table>
<thead>
<tr>
<th>Website Location</th>
<th>Data Controller/joint Data Controllers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Austria</td>
<td>Armstrong World Industries Limited</td>
</tr>
<tr>
<td>Estonia</td>
<td>Armstrong World Industries Limited</td>
</tr>
<tr>
<td>Germany</td>
<td>Armstrong World Industries Limited</td>
</tr>
<tr>
<td>Ireland</td>
<td>Armstrong World Industries Limited</td>
</tr>
<tr>
<td>Italy</td>
<td>Armstrong Building Products S.R.L. and Armstrong World Industries Limited</td>
</tr>
<tr>
<td>Latvia</td>
<td>Armstrong World Industries Limited</td>
</tr>
<tr>
<td>Lithuania</td>
<td>Armstrong World Industries Limited</td>
</tr>
<tr>
<td>Portugal</td>
<td>Armstrong Architectural Products S.L. and Armstrong World Industries Limited</td>
</tr>
<tr>
<td>Spain</td>
<td>Armstrong Architectural Products S.L. and Armstrong World Industries Limited</td>
</tr>
<tr>
<td>United Kingdom</td>
<td>Armstrong World Industries Limited</td>
</tr>
<tr>
<td>Turkey</td>
<td>Armstrong World Industries Limited</td>
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</table>