

Attachment D
CAS Privacy Policy
ICPT BOA Agreement LLNL-BOA-2026-001

This webpage sets out when and how we use your personal information that you or others provide to us.

1 WHO ARE WE?

We are CAS, a division of the American Chemical Society (ACS). ACS is an American federally chartered non-profit organization.

Our website is www.cas.org. We are located at 2540 Olentangy River Road, Columbus, Ohio 43202-1505, U.S.A.

2 HOW WE USE YOUR DATA?

When you use our products and/or services

We act as a data processor for the companies, institutions and universities who subscribe to our services. If you are a user of our products and services, we hold limited personal information about you. This is generally limited to the information we need to validate you are authorised to access our services under your employer or university's contract with us. Please contact your employer or university in the first instance if you have any queries in connection with how your data is used by CAS.

We need to collect and use your personal information in this way to carry out the contract in place between us and your employer or university.

When you attend one of our education sessions, CAS events or CAS product demonstrations

When you attend one of our educational sessions, CAS events or conferences or a CAS product demonstration, we will collect such information from you as your name, address, email address, phone number, employer/academic institution, position title and payment

details, if applicable. We need to use your personal information in this way to complete and confirm your registration.

When you phone us, email us or use our website chat service

When you phone us or contact us by email with general queries, we may also handle your personal information in order to provide the customer services you have requested. This could be when you ask for our assistance troubleshooting issues with our products or services (customer support), explaining how our products or services work, or you request information about new products and/or services.

Unless we are contracted to provide this support to you, we rely on your consent to handle your personal information in this way. If you do not provide us with the personal information we request from you for customer services purposes, we may not be able to fully answer your queries.

When you have expressed an interest in, or are renewing your contract with, CAS:

This section applies if you have opted in to receive marketing communications from us, or have previously expressed an interest in CAS and not opted out.

We will handle your personal information (such as name, address, email address, phone number, position, title, employer/academic institution) to provide you with marketing communications in-line with any preferences you have told us about.

When we send you marketing emails because you have opted-in to receive them, we rely on your consent to contact you for marketing purposes.

If you have not opted-in and we send you marketing emails, we do this because of our legitimate interest to promote the success of CAS and ACS as a whole.

Every email we send to you for marketing purposes will also contain instructions on how to unsubscribe from receiving them.

You are not under any obligation to provide us with your personal data for marketing purposes.

You can tell us that you do not want your personal information to be processed in this way at any time by contacting us at CASPrivacy@cas.org or by following the unsubscribe link shown in every marketing communication you receive from us.

We may upload certain personal data elements [e.g. name, email address, job title] to third party platforms so they can identify and serve targeted advertisements to you or individuals with a similar profile to you who are likely to be interested in our products and services. We do this on the basis of our legitimate interest to promote our products and services and to provide more relevant content. If you wish to opt-out of your data being used in this way, please contact us at CASPrivacy@cas.org.

If we are discussing your interest in CAS products, services or solutions, or you are renewing your organization's contract with us, we typically collect the name, email address and other contact details of the individuals making contact with us and/or those authorised to subscribe to our services or solutions. Our lawful basis to do this is our legitimate interest to promote the continued success of our business.

To make our website, products and services better:

We will also use your personal information to provide you with a more effective user experience such as by displaying articles and links in which we think you will be interested.

Our use of your information in this way means that your experience of our site will be more tailored to you, and that the articles and links you see on our site may differ from those seen by someone accessing the same site with a different history or browsing habits.

We may also share your aggregated, anonymous data with third party analytics and search engine providers that assist us in the improvement and optimization of our site.

We may also use your personal information for the purposes of making our site, products and services more secure, and to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes. We may also use your personal information to send you surveys about our products, services or site to help us improve our offerings to you.

We process your data for this reason because we have a legitimate interest to provide you with the best experience we can, and to ensure that our site, products and services are kept secure.

You can prevent us from using your personal information in this way by using the 'do not track' functionality in your internet browser if your browser offers this option. If you enable 'do not track' functionality, our site may be less tailored to your needs and preferences.

If our business or our assets are sold:

We will transfer your personal information to a third party if we sell any business or assets. We will provide your personal information to the seller (but only to the extent we need to, and always in accordance with data protection legislation);

We process your personal information for this purpose because we have a legitimate interest to ensure our business can be continued by the buyer. If you object to our use of your personal information in this way, the buyer of our business may not be able to provide services to you.

In some circumstances we may also need to share your personal information if we are under a duty to disclose or share it to comply with a legal obligation.

3 WHAT ABOUT TECHNICAL INFORMATION AND ANALYTICS?

When you visit our site, we may collect such information as:

- technical information, including the Internet protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, screen resolution, operating system and platform; and
- information about your visit, including the full Uniform Resource Locators, clickstream to, through and from our site (including date and time), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page.

Information we receive from other sources: We are also working closely with third party advertising networks, analytics providers, hosting providers and search information providers from whom we may also receive general aggregated anonymous information about you.

We may combine the information you provide to us with information we collect about you.

4 COOKIES

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer. We only use (and store) non-essential cookies on your computer's browser or hard drive if you provide consent. We may collect information through your use of our products or in electronic communications to you. We use cookies to determine storage medium, provide you with access to third-party content, and to establish statistics

about product usage. For example, by setting a cookie on a product, you will not have to login in a password more than once, which saves you time. The cookie also keeps track of your website browsing session while you are using our products

Our website uses cookies to distinguish you from other users. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. By continuing to browse the website, you are agreeing to our use of cookies. Herein is a sample, non-exhaustive list of the categories of cookies we use and their purpose:

Category Of Use	Purpose Of The Use
Preferences	To help us remember your settings and preferences so that we can provide you with a more personalized experience.
Authentication and Security	To log you into our products and services which enable us to show you your account data, and help us keep your account safe and secure.
Service Features and Performance	To provide you with functionality and optimize the performance of our products and services. For example, to keep track of your previous search requests and improve our website’s load speed and performance
Analytics and Research	To help us understand how you are using our products and services so that we can make them better, faster, and safer.

Advertising	To enable our partners to serve ads for our products and services; deliver relevant ads to people who may be interested in them on other services; measure the performance of ads; and opt you out of receiving interest-based ads if that is your choice.
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Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, which we do not have any control over.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies.

However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

Except for essential cookies, all cookies will expire after 2 years.

To learn more about how cookies are used on cas.org and CAS websites and to see your options for managing those cookies, please visit the [CAS Cookie Policy](#).

5 WHERE IS MY DATA STORED?

We (and many of our external third parties) are based outside the European Economic Area (EEA) so their processing of your personal information will involve a transfer of data outside of the EEA.

Whenever we transfer your personal information outside of the EEA, we ensure it is protected by making sure at least one of the following safeguards is in place:

- by transferring your personal information to a country that has been deemed to provide an adequate level of protection by the European Commission;
- by using specific contracts approved by the European Commission which give your personal information the same protection it has in the EEA;

To keep this Privacy Policy as short and easy to understand as possible, we have not set out the specific circumstances when each of these protection measures are used. You can contact us at CASPrivacy@cas.org for the details as to how we protect specific transfers of your data.

All information you provide to us is stored on our secure servers or those of our third-party data storage providers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. You must not share your password with anyone.

6 HOW LONG DO WE RETAIN YOUR DATA?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or contractual requirements.

To determine the appropriate retention period for the personal information we hold, we consider the amount, nature and sensitivity of the personal information, the risk of harm from unauthorized use or disclosure of your personal information, the reasons why we handle your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

Where we have used your personal information to contact you for marketing communications, if you have opted-in:

- we will contact you periodically as we determine is reasonable and appropriate to ensure you would like to continue receiving electronic communications; or

If you tell us that you no longer wish to receive marketing communications from us, we promise to stop sending them to you.

Where we have processed your data for any other reason (such as where you have contacted us with a question in connection with our products or services) we will retain your data for as long as necessary to fulfill the purposes we collected it for, including to satisfy any legal, accounting or other similar requirements.

In some circumstances we may anonymize your personal data (so that it can no longer be associated with you) for research, product development, improvement or statistical purposes, in which case we may use this information indefinitely without further notice to you.

7 YOUR RIGHT TO OBJECT UNDER DATA PROTECTION LAWS

You may have the right to object to us handling your personal information when:

- we are handling your personal information based on our legitimate interests (as described in the “HOW DO WE USE YOUR DATA” section above). If you ask us to stop handling your personal information in this way, we will stop unless we can show you that we have compelling grounds as to why our use of your personal information should continue; or
- for marketing purposes. If you ask us to stop handling your personal information on this basis, we will stop.

8 WHAT ARE MY RIGHTS UNDER DATA PROTECTION LAWS?

Depending on your location, you may have various rights under the data protection laws, which you can exercise by contacting us. The easiest way to do this is by email at privacy@cas.org

Right of access

You may be entitled receive confirmation as to whether your personal information is being processed by us, as well as various other information relating to our use of your personal information.

You may also have the right to access your personal information which we are handling.

Right to rectification

You may have the right to require us to rectify any inaccurate personal information we hold about you. You also have the right to have incomplete personal information we hold about you completed, by providing a supplementary statement to us.

Right to restriction

You may be able to restrict our processing of your personal information where:

- you think we hold inaccurate personal information about you;

- our handling of your personal information breaks the law, but you do not want us to delete it
- we no longer need to process your personal information, but you want us to keep it for legal reasons; or
- where we are handling your personal information because we have a legitimate interest (as described in the “How We Use Your Data” section above, and are in the process of objecting to this use of your personal information.

If you exercise your right to restrict us from using your personal information, we will then only process your personal information when you agree, except for storage purposes and to handle legal claims.

Right to data portability

You may have the right to receive your personal information in a structured, standard machine readable format and to send this to another organization controlling your personal information.

This right only applies to your personal information we are handling because you consented to us using it or because there is a contract in place between us.

Right to erasure

You may have the right to require us to erase your personal information which we are handling in the following circumstances:

- where we no longer need to use your personal information for the reasons for which we told you we collected it;
- where we needed your consent to use your personal information, you have withdrawn your consent and there is no other lawful way we can continue to use your personal information;
- when you object to our use of your personal information and we have no compelling reason to carry on handling it;
- if our handling of your personal information has broken the law; and
- when we must erase your personal information to comply with a law we are subject to.

Right to complain

You may have the right to lodge a complaint with the supervisory authority for data protection issues in your country or territory. As we conduct business globally, we have not set out the specific supervisory authorities for each country in this policy, but please contact us if you would like us to identify who the relevant supervisory authority is in your country or territory.

9 WHAT ABOUT WEBSITES WE LINK TO?

Our site may, from time to time, contain links to and from the websites of our partner networks and affiliates.

If you follow a link to any of these websites or use our services, please note that you have left our site and these websites have their own privacy policies.

We do not accept any responsibility or liability for these policies or websites. Please check their policies before you submit any personal information to these websites.

10 WHEN WILL YOU CHANGE YOUR PRIVACY POLICY?

CAS may update the Privacy Policy from time to time. Any changes we make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail or post.

Please check back frequently to see any updates or changes to our Privacy Policy.

11 HOW DO I CONTACT YOU WITH FEEDBACK?

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to CASPrivacy@cas.org

This Privacy Policy was last updated on June 5, 2025.