



Privacy Policy

Cytec Industries Inc. respects individual privacy and the confidence of its employees, customers, suppliers, consultants and other business partners. Cytec strives to collect, use and disclose Personal Information in a manner consistent with the laws of the countries in which it does business. Cytec abides by and is in compliance with the Safe Harbor Principles set forth in the July 2000 agreement between the U.S. Department of Commerce and the European Commission.

This Privacy Policy ("Policy") sets forth the privacy principles that Cytec follows with respect to transfers of Personal Information anywhere in the world, including transfers from the European Economic Area (EEA) to the United States.

I. Definitions

For purposes of this Policy, the following definitions shall apply:

- (a) "**Agent**" means any third party that uses or collects Personal Information on behalf of Cytec at Cytec's direction.
- (b) "**Cytec**" means Cytec Industries Inc., its predecessors, successors and subsidiaries.
- (c) "**Personal Information**" means any information or set of information that identifies or could be reasonably used to identify an individual covered. Personal Information does not include information that is encoded or publicly available information that has not been combined with non-public Personal Information.
- (d) "**Sensitive Personal Information**" means Personal Information that reveals medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership (excluding utilization of this information for employee compensation and benefit purposes), or information specifying the sex life of the individual. In addition, Cytec will treat as Sensitive Personal Information, any information received from a third party, where that third party treats and identifies the information as sensitive.

II. Privacy Principles

The following privacy principles apply to the collection, use and disclosure of Personal Information by Cytec in conducting human resource activities.

1. **Notice:** If Cytec collects Personal Information directly from individuals, it will inform them about the purposes for which it collects and uses Personal Information about them, the types of non-Agent third parties to which Cytec discloses that information, and the choices and means Cytec offers individuals for limiting the use and disclosure of their Personal Information. Notice will be provided in clear and conspicuous language when individuals are first asked to provide Personal Information to Cytec, or as soon as practicable thereafter, and in any event before Cytec uses the information for a purpose other than that for which it was originally collected.

2. **Choice:** Cytec will offer individuals the opportunity to choose (opt-out) whether their Personal Information is: (a) to be disclosed to a non-Agent third party; or (b) to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual. The collection and use by Cytec of employee personal information is set forth in Cytec's Code of Conduct, which is available on Cytec's homepage.

For Sensitive Personal Information of individuals located in the member states of the European Union, Australia or in Canada, Cytec will not collect Sensitive Personal Information unless it gives those individuals the opportunity to affirmatively and explicitly (opt-in) consent to the collection of such information. In addition, individual consent will be obtained for: (a) the disclosure of the information to a non-Agent third party; or (b) the use of the information for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual.

3. **Onward Transfers:** Cytec will obtain assurances from its Agents that they will safeguard Personal Information consistently with this Policy. Examples of appropriate assurances that may be provided by Agents include: a contract obligating the Agent to provide at least the same level of protection as is required by the Safe Harbor Principles; Safe Harbor certification by the Agent; or the Agent being subject to another adequacy finding of the respective country. Where Cytec has knowledge that an Agent is using or disclosing Personal Information in a manner contrary to this Policy, Cytec will take reasonable steps to prevent or stop the use or disclosure.

Cytec will only disclose Personal Information to a non-Agent third party in accordance with the notices provided to the individuals who are the subject of the Personal Information and any consent those individuals have given.

4. **Access and Correction:** Upon request, Cytec will grant individuals reasonable access to Personal Information that it holds about them. In addition, Cytec will take reasonable steps to permit individuals to correct, amend or delete information that is demonstrated to be inaccurate or incomplete. Any employee that desires to review or update his or her Personal Information can do so by contacting their local human resources representative.

5. **Data Integrity:** Cytec will use Personal Information only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual. Cytec will take reasonable steps to ensure that Personal Information is relevant to its intended use.

6. **Security:** Cytec will take reasonable precautions to protect Personal Information in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction.

7. **Enforcement:** Cytec will conduct annual compliance audits of its relevant privacy practices to verify adherence to this Policy and the Safe Harbor Principles. The audit will be conducted under the direction of the Privacy Officer. Any employee that Cytec determines is in violation of this Policy will be subject to disciplinary action up to and possibly including termination of employment.

Any questions or concerns regarding the use or disclosure of Personal Information should be directed to the Compliance Officer at the address set forth below. Cytec will investigate and attempt to resolve complaints and disputes regarding use and disclosure of Personal Information in accordance with the principles contained in this Policy. For complaints that cannot be resolved between Cytec and the complainant, Cytec has agreed to participate in the dispute resolution procedures of the American Arbitration Association ("AAA") in accordance with its applicable commercial rules as well as the Safe Harbor Principles. The arbitration shall be governed by one (1) arbitrator which shall be selected by Cytec and such arbitration shall take place at Cytec's offices located in Woodland Park, New Jersey (USA). As it relates to human resource information for Cytec employees located in the member states of the European Union, Cytec has agreed to participate in the dispute resolution program provided by the European Data Protection Authorities.

III. Effective Date and Changes to this Safe Harbor Privacy Policy

The practices described in this Policy are the current Personal Information protection policies as of January 13, 2006. It shall be posted on Cytec's intranet website. Cytec reserves the right to modify or amend this Policy at any time consistent with the requirements of the Safe Harbor Principles and other applicable laws and regulations. Adherence by Cytec to these privacy principles may be limited to: (i) the extent required to meet legal or ethical obligations and (ii) to the extent expressly permitted by applicable law, rule or regulations, governmental, national security or public interest obligations. While the Privacy Policy sets forth Cytec's current practice on handling personal information, each subsidiary must comply with all applicable local laws.

IV. Privacy Officer

The Privacy Officer is responsible for overseeing Cytec's administration of this Policy and its current data practices. Questions or comments regarding this Policy should be submitted to the Privacy Officer as follows:

Privacy Officer
Cytec Industries Inc.
Five Garret Mountain Plaza
Woodland Park, New Jersey 07424
U.S.A.
Attention: Privacy Officer

1-973-357-3100

Complaints & Arbitration

Any questions or concerns regarding the use or disclosure of Personal Information should be directed to the Compliance Officer at the address set forth below. Cytec will investigate and attempt to resolve complaints and disputes regarding use and disclosure of Personal Information in accordance with the principles contained in this Policy. For complaints that cannot be resolved between Cytec and the complainant, Cytec has agreed to participate in the dispute resolution procedures of the ICDR/American Arbitration Association ("AAA") Safe Harbor program, of which Cytec is a member. As it relates to human resource information for Cytec employees located in the member states of the European Union, Cytec has agreed to participate in the dispute resolution program provided by the European Data Protection Authorities.

Cytec Industries Inc.
Five Garret Mountain Plaza
Woodland Park, New Jersey 07424
U.S.A.
Attention: Compliance Officer

To contact Cytec's Ethics and Compliance Hotline, please visit <http://www.cytec.com/company/code-of-conduct>, and refer to the pages pertaining to Lighthouse.