



Privacy Notice: Dow Website AI Features

Last Updated: August 21, 2026

This Notice applies to artificial intelligence (“AI”)-enabled website experiences available through Dow websites, including the:

- AI Search Engine, which provides search results, AI-generated summaries, recommendations, and answers based on information indexed from Dow websites and other approved sources; and
- AI Chatbot, which provides conversational assistance and may retrieve information or facilitate authorized self-service functionality through connected systems.

Together, these website services are referred to in this Notice as the “**AI Features**.”

1. Who Processes Personal Data

The Dow Chemical Company and its affiliates (“**Dow**”) are responsible for determining how and why personal data is processed through the AI Features. Dow uses authorized service providers to support these features, including:

- Coveo Solutions, Inc. (“Coveo”), which supports search, indexing, relevance, retrieval, generative-answering, and related analytics capabilities used by the AI Search Engine and AI Chatbot; and
- Microsoft Corporation (“Microsoft”), Microsoft, which provides Azure OpenAI services used by the AI Chatbot to interpret requests, support approved tool selection, and generate responses using information returned from authorized sources.

These providers process information on Dow’s behalf and subject to applicable contractual requirements.

2. How the AI Features Work

The AI Features help users locate information, obtain answers, and interact more efficiently with Dow website content and connected systems.

Depending on the user’s request:

- The AI Search Engine may use Coveo services to retrieve and summarize information indexed from Dow websites and other approved content sources.
- The AI Chatbot may use Microsoft Azure OpenAI services to interpret the request and generate a conversational response using information returned from authorized sources. Search-related requests may utilize Coveo retrieval capabilities. Account, order, delivery,

or other transactional requests may utilize Dow-controlled tools connected to authorized Dow systems.

Both AI Features are designed to retrieve, summarize, and present information from approved sources and connected systems, rather than generating responses solely from generalized pretrained model knowledge. The sources, tools, and connected systems used by the AI Features may vary depending on the nature of the request.

3. Personal Data Processed

Depending on which AI Feature you use, whether you are signed into a Dow website account, the nature of your request, and your interactions with the AI Features, Dow and its authorized service providers may process the following categories of personal data (collectively, “**Your Data**”):

- Information You Submit: Information you voluntarily provide when interacting with the AI Features, including: search terms, questions, prompts, instructions, requests, and other text you submit; information contained in your communications with the AI Features; feedback, ratings, comments, or reports concerning responses, search results, or functionality; and information submitted in connection with an available self-service feature, transaction, account inquiry, order inquiry, or delivery inquiry.
- AI-Generated and Retrieved Information: Information generated or retrieved in response to your interactions, including: AI-generated answers, summaries, recommendations, and responses; search results, citations, source references, and retrieved content; information retrieved from your authenticated Dow website account or connected Dow systems when necessary to respond to your request (such as account, order, or delivery information); and records relating to response quality, feedback, ratings, acceptance, rejection, or reports of inaccurate or incomplete information.
- Account and Identity Information: If you access authenticated features, this may include: name; business email address; user, customer, or account identifier; company, country, and language preferences; authentication, login, and logout information; account permissions, security groups, roles, and access rights; and other account-related information necessary to authenticate you or provide authorized functionality.
- Website, Device, and Usage Information: Information generated through your use of Dow websites and the AI Features, including: IP address; cookie, session, or device identifiers; browser, device, and technical configuration information; browsing activity, documents, and search results viewed, selected, or interacted with; traffic sources, timestamps, locale, language, filters, and search context; and operational, diagnostic, performance, security, and system activity.

4. Purposes of Processing

Dow may process Your Data through the AI Features for the following purposes:

- Provide and Support the AI Features and Requested Services: interpret and respond to questions, prompts, and requests; retrieve, summarize, and present relevant information; provide search results, recommendations, citations, and source links; provide authorized

account, order, delivery, and other self-service functionality; personalize responses based on available account information and user context; and maintain conversational context during an active chatbot session.

- Secure, Maintain, and Improve the AI Features: evaluate performance, relevance, accuracy, usability, and quality; identify content gaps and system errors; troubleshoot technical issues; monitor system reliability; maintain system integrity and security; detect, prevent, and investigate fraud, abuse, misuse, unauthorized activity, and security incidents; and improve the AI Features, Dow website content, and overall user experience.
- Support Analytics, Personalization, Customer Relationship Management, and Commercial Activities: where permitted by applicable law and consistent with your choices, create a profile of you as an end user; understand interests, preferences, and website usage patterns; personalize content, search results, recommendations, and related website experiences; identify potential customer needs, interests, and business opportunities; support customer relationship management activities; conduct sales, marketing, e-commerce, and related commercial activities; store relevant information in Dow's commercial, marketing, and e-commerce systems; and evaluate and improve the effectiveness of Dow's digital experiences, communications, products, and services.
- Comply with Legal, Regulatory, Contractual, and Business Obligations: comply with applicable laws, regulations, legal process, and governmental requests; enforce applicable terms, policies, and contractual obligations; investigate suspected misconduct or policy violations; respond to privacy, security, and other legal rights requests; satisfy audit, compliance, records-management, and reporting requirements; and establish, exercise, or defend legal claims, investigations, disputes, and legal rights.

5. Legal Bases for Processing

The legal basis for processing Your Data through the AI Features depends on the nature of your interaction, the applicable law, and the purpose of the processing. Where required under applicable law, Dow relies on one or more of the following legal bases:

- Consent: Dow may rely on your consent for certain AI-related processing activities where required by applicable law. Where consent is the legal basis for processing, you may withdraw your consent at any time using the methods described in Section 14 below. Withdrawal of consent will not affect the lawfulness of processing that occurred before consent was withdrawn.
- Performance of a Contract: Where you use authenticated Dow website features, registered accounts, self-service capabilities, order-management functionality, delivery-tracking functionality, or other services requested by you, Dow may process Your Data as necessary to provide the requested service, perform contractual obligations, or take steps requested by you before entering into a contract.
- Legitimate Interests: Where permitted by applicable law, Dow may process Your Data based on its legitimate interests in providing, operating, maintaining, securing, governing, and improving the AI Features and related systems; supporting customer relationships and related commercial activities; maintaining website functionality; preventing fraud, abuse, misuse, unauthorized activity, and security incidents; protecting Dow's rights,

property, personnel, systems, operations, and business interests; and otherwise conducting the processing activities described in this Notice. When relying on legitimate interests, Dow seeks to balance those interests against the rights, freedoms, interests, and reasonable expectations of individuals.

- Compliance with Legal Obligations: Dow may process Your Data where necessary to comply with legal, regulatory, tax, compliance, audit, records-management, governmental, law-enforcement, or other legal obligations.
- Establishment, Exercise, or Defense of Legal Claims: Dow may process Your Data where necessary to establish, exercise, or defend legal claims, investigations, disputes, proceedings, or other legal rights and interests.

6. AI Model Training and Improvement

Dow does not authorize Your Data (including personal data, prompts, responses, conversation content, search interactions, or other information submitted through the AI Features) to be used to train publicly available, shared, or general-purpose artificial intelligence models.

Information processed through the AI Features may, where permitted and configured for the applicable feature, be used by Dow and its authorized service providers to evaluate, configure, test, validate, monitor, optimize, retrain, fine-tune, or otherwise improve Dow's AI Features and related capabilities.

Any such retraining, fine-tuning, optimization, or model-improvement activities will be limited to:

- improving Dow's AI Features and related services;
- improving performance, relevance, and usefulness for Dow users;
- improving retrieval quality, search results, recommendations, personalization, and AI-generated responses;
- identifying and addressing content gaps, inaccuracies, and system errors; and
- supporting operational, security, auditing, troubleshooting, quality-assurance, compliance, and governance purposes.

Dow and its authorized service providers may also use aggregated, de-identified, pseudonymized, or statistical information derived from interactions with the AI Features to evaluate performance, identify content gaps, improve user experience, measure effectiveness, enhance system quality, and support product, feature, and service development, subject to applicable law and this Notice.

The use of information for feature improvement, relevance optimization, retraining, fine-tuning, answer-quality improvement, analytics, or similar purposes does not mean that Your Data is used to train publicly available, shared, or general-purpose artificial intelligence models.

7. Service Providers and Other Recipients

Dow may disclose, transfer, or otherwise make available Your Data to the following categories of recipients:

- Authorized Service Providers: including Coveo, Microsoft, and other authorized providers supporting the AI Features, connected business systems, website functionality, analytics, communications, customer relationship management, e-commerce, and related commercial functions.
- Dow Affiliates and Personnel: including Dow employees, contractors, and affiliated entities with a legitimate business need to access Your Data in connection with operating, supporting, securing, assessing, auditing, maintaining, improving, or governing the AI Features and related systems.
- Other Third Parties: where disclosure is required or permitted by applicable law, legal process, governmental request, contractual obligation, audit requirement, investigation, or in connection with the establishment, exercise, or defense of legal rights and claims.

Any use of search, chatbot, browsing, or interaction information for analytics, personalization, customer relationship management, advertising, marketing, or related commercial purposes remains subject to this Notice, Dow's [Privacy Statement](#), applicable law, and the privacy choices available to you.

8. Access to and Processing of Your Communications

The AI Features cannot provide search results, AI-generated summaries, chatbot responses, recommendations, or other requested functionality without processing your search terms, prompts, requests, and related interaction information.

When you submit a search, prompt, or other communication through an AI Feature:

- Dow and its authorized service providers may contemporaneously receive, access, transmit, process, analyze, and, where applicable, store information necessary to provide the requested functionality;
- the applicable service provider may receive the search term, prompt, retrieval request, or other information necessary to perform its authorized function;
- Coveo may receive your search prompt and associated search context when the AI Search Engine is used or when the AI Chatbot invokes Coveo retrieval functionality;
- Microsoft Azure OpenAI may process chatbot prompts and related interaction information to interpret your request, determine the appropriate tool or data source to use, and generate a response;
- authorized Dow systems and connected business applications may receive information necessary to retrieve requested content, account information, order status, delivery status, or other available self-service functionality; and
- information regarding your interactions may be used for operational, security, troubleshooting, analytics, quality-assurance, auditing, compliance, and service-improvement purposes as described in this Notice.

By submitting a search, prompt, or other communication through an AI Feature, you acknowledge and—where required by applicable law—consent to Dow and its authorized service providers accessing, transmitting, processing, analyzing, and, where applicable, storing that communication and related interaction information as described in this Notice. If you do not wish your interactions to be processed in this manner, do not use the applicable AI Feature. You

may continue to access and navigate publicly available Dow website content without using the AI Features, subject to the processing activities described in Dow's [Privacy Statement](#).

9. Retention

Dow retains information processed through the AI Features only for as long as reasonably necessary to satisfy the processing purposes described in this Notice.

- **AI Search Engine:** Search interactions, prompts, responses, and related usage information may be retained in accordance with applicable Coveo retention settings and Dow's agreements with Coveo. Coveo usage analytics data is currently retained for up to three (3) years and may remain in backup systems for up to one (1) additional year.
- **AI Chatbot:** Conversation context is maintained during an active website session so that the chatbot can interpret requests and provide coherent responses. Session chat history is cleared when the session ends.

In addition to the retention practices described above, certain operational, security, diagnostic, quality-assurance, compliance, audit, analytics, troubleshooting, transactional, and similar records generated in connection with the AI Features may be retained separately where reasonably necessary to:

- provide, authenticate, document, or support a requested service or transaction;
- maintain, secure, monitor, troubleshoot, and improve the AI Features and connected systems;
- investigate errors, misuse, abuse, fraud, or security incidents;
- comply with applicable legal, regulatory, contractual, records-management, or audit requirements; or
- establish, exercise, or defend legal rights, claims, investigations, or disputes.

Retention periods may vary depending on the type of information, the applicable system, the purpose for which the information was collected, and applicable legal or business requirements. When information is no longer needed for these purposes, it will be deleted, anonymized, de-identified, or otherwise disposed of in accordance with Dow's records-management practices and applicable law.

10. International Processing and Transfers

Because Dow websites are available globally, Your Data may be accessed, processed, transferred, or stored in countries other than the country in which you are located. Where required by applicable law, Dow uses contractual and other legally recognized safeguards to protect personal data transferred internationally.

11. AI-Generated Responses and User Responsibilities

AI-generated responses, search results, summaries, recommendations, and other outputs provided through the AI Features are intended for informational purposes only and may be

incomplete, inaccurate, outdated, or unavailable. You should independently verify material information against cited sources and applicable official Dow documentation before relying on it.

In the event of any inconsistency between an AI-generated response and official Dow information, the official Dow information will control, including, as applicable: product specifications; safety data sheets; technical data sheets; regulatory, compliance, and product stewardship documentation; account, order, delivery, and transactional records; quotations, proposals, and commercial communications; contracts and other legally binding agreements; applicable website terms and policies; and other official Dow communications.

The AI Features do not provide legal, regulatory, safety, engineering, medical, financial, tax, accounting, or other professional advice, and should not be relied upon as a substitute for independent professional judgment.

You are responsible for reviewing and validating information provided through the AI Features before taking action based on that information.

To help protect your privacy and the security of Dow systems, you should not submit through the AI Features: passwords, authentication credentials, or security codes; payment card or banking information; health or medical information; government-issued identification numbers; sensitive personal data; confidential, proprietary, trade secret, or export-controlled information unless specifically required for an authorized function; information subject to legal privilege or confidentiality obligations; or personal or confidential information concerning another person unless you are authorized to provide it and the disclosure is necessary for the requested purpose.

Dow may restrict, block, or decline requests that exceed the intended purpose of the AI Features or that may create legal, regulatory, security, privacy, or operational risks.

12. Automated Decision-Making and Profiling

The AI Features provide information, search results, summaries, recommendations, and assistance. They are not intended to make decisions about individuals that produce legal effects or similarly significant effects without human involvement. They do not independently approve, deny, modify, or make decisions regarding matters that would have legal or similarly significant effects on an individual.

Dow may, however, use automated methods to analyze interactions with the AI Features and to create or enhance a profile of you as an end user. Such profiling may be based on Your Data, including your searches, prompts, interactions, browsing behavior, interests, preferences, account information, and other information collected through Dow websites or connected Dow systems. Dow may use these profiles to improve search relevance, personalize content and recommendations, enhance user experience, support customer relationship management activities, identify potential customer interests or business opportunities, and support sales, marketing, e-commerce, and related commercial activities, subject to applicable law and this Notice.

13. Privacy Choices and Rights

Depending on your location and applicable law, you may have rights regarding Your Data, including the right to: access, review, or obtain a copy of Your Data; correct or update inaccurate personal data; request deletion of Your Data; restrict or object to certain processing activities; withdraw consent, where processing is based on consent; and submit a complaint to an applicable regulatory or supervisory authority.

The availability, scope, and exercise of these rights vary by jurisdiction and may be subject to applicable legal exceptions and limitations.

Use of the AI Features is voluntary. If you do not wish Your Data to be processed through an AI Feature, you may choose not to use that feature. You may continue to access and navigate Dow websites without using the AI Features, subject to the processing activities described in Dow's [Privacy Statement](#).

Withdrawal of consent or cessation of use will not affect processing that occurred lawfully before such withdrawal or cessation. In certain circumstances, Dow may retain information where necessary to comply with legal, regulatory, contractual, audit, records-management, security, or other legitimate business obligations.

To exercise your rights, submit a request through Dow's privacy portal [here](#) or contact the Dow Data Privacy Office (fglpriv@dow.com).

14. More Information

For information about Dow's privacy practices, refer to Dow's [Privacy Statement](#) and—if applicable—[Customer Privacy Notice](#), [Supplier Privacy Notice](#), [Applicant and Candidate Privacy Notice](#), and [Employee Privacy Notice](#).