

## PRIVACY POLICY

Effective date: January 1, 2020

We are committed to protecting your privacy. This Privacy Policy describes how we may collect, use and disclose information you provide us or that is collected when you access or use our website and any other website, channel, application, mobile feature and/or platform we operate (collectively the "Website") . **BY CREATING AN ACCOUNT, USING THE WEBSITE OR SUBMITTING ANY INFORMATION (INCLUDING PERSONAL INFORMATION SUCH AS YOUR NAME, EMAIL ADDRESS AND OTHER NON-PUBLIC INFORMATION), YOU AGREE TO BE BOUND TO THE TERMS OF THIS PRIVACY POLICY.**

### 1. INCORPORATION BY REFERENCE

This Privacy Policy does not alter in any way the Website Terms and Conditions of Use [link] ("Terms of Service") or any other agreement you may have with us, and is hereby incorporated into the Terms. Whether you use the Website or not, the provisions of the Terms of Service apply to this Privacy Policy, including without limitation, the following: Disclaimer of Warranties, Limitation of Liability, Indemnification, Choice of Law, and Dispute Resolution. We encourage you to review the Terms of Service before using any of our web services.

### 2. INFORMATION WE COLLECT

a. Personal Identifiable Information. "Personal Identifiable Information" or "PII" is information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular natural human person or household. We may collect and use the following categories of Personal Information:

Categories of Personal Information
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)
Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.
Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies)
Biometric information

Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement). Like other websites and apps, we collect data about the browsers and devices you use to access our site(s). The data we collect includes browser or device model and settings, operating system, unique identifiers, and the version of the app you’re using if a mobile app is being used. We also collect data about how your browsers and devices interact with our services, including IP address, crash reports, system activity, and the date and time.
Geolocation data from mobile or desktop browsers. You can disable location access through your browser settings
Audio, electronic, visual, thermal, olfactory, or similar information
Professional or employment-related information

You can choose not to provide certain information, but it may delay or prevent us from providing products AND/OR services to you.

b. Non-personal Identifiable Information. This Privacy Policy applies to PII; it does not apply to other types of information you may disclose or that we may collect, including aggregate user statistics, demographic information, and other data that does not include PII or from which you cannot be identified.

### 3. HOW YOUR PERSONAL INFORMATION IS COLLECTED.

We collect most of this Personal Information directly from you—in person, by telephone, text or email and/or via our website and apps. However, we may also collect information:

- From publicly accessible sources (e.g., property records);
- Directly from a third party (credit reporting agencies, or customer due diligence providers);
- From a third party with your consent (e.g., your bank);
- From cookies on our website; and
- Via our IT systems, including:
  - o Door entry systems and reception logs;
  - o 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
  - o [any other relevant systems].

### 4. USE OF INFORMATION

Under data protection laws, we can only use your Personal Information if we have a proper reason for doing so, e.g.

- To comply with our legal and regulatory obligations;
- For providing the services you request while interacting with our Website;
- For our legitimate interests or those of a third party; or
- Where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) Your Personal Information for and our reasons for doing so:

<b>What we use your Personal Information for</b>	<b>Our reasons</b>
To provide products AND/OR services to you	To execute our delivery of such product and services provide
To prevent and detect fraud or abuse	For our legitimate interests or those of a third party, i.e. to minimize fraud that could be damaging for us, a third party or for you
<p>Conducting checks to identify our customers and verify their identity</p> <p>Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety regulation or rules issued by our professional regulator</p>	To comply with our legal and regulatory obligations
Gathering and providing information required by or relating to audits, enquiries 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	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can improve our products and services
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can improve our products and services

Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, i.e. to protect trade secrets and other commercially valuable information  To comply with our legal and regulatory obligations
Statistical analysis to help us manage our business, e.g. in relation to our financial performance, customer base, product range or other efficiency measures	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can improve our products and services
Preventing unauthorized access and modifications to systems	For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you  To comply with our legal and regulatory obligations
Updating and enhancing customer records	For the performance of our contract with you or to take steps at your request before entering into a contract  To comply with our legal and regulatory obligations  For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our customers about existing orders and new products
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  For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
Marketing our services and those of selected third parties to: <ul style="list-style-type: none"> <li>— existing and former customers;</li> <li>— third parties who have previously expressed an interest in our services;</li> <li>— third parties with whom we have had no previous dealings.</li> </ul>	For our legitimate interests or those of a third party, i.e. to promote our business to existing and former customers
[Credit reference checks via external credit reference agencies]	[For our legitimate interests or those of a third party, i.e. to ensure our customers are likely to be able to pay for our products and services]

External audits and quality checks, e.g. security accreditation and the audit of our accounts	For our legitimate interests or a those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards  To comply with our legal and regulatory obligations
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## 5. WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We routinely share Personal Information with:

- Our affiliates, including companies under common control with Continental AG;
- Service providers we use to help deliver our [products and/or 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 bank[s];

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

Sales of personal information. We may allow certain companies to place tracking technologies like cookies and pixels on our sites, which allow those companies to receive information about your activity on our Website that is associated with your browser or device. The companies may use that data to serve you more relevant ads on our sites or others. Under some state laws, sharing data for online advertising like this may be considered a “sale” of information. Except for this kind of sharing, we don’t sell any of your personal information.

In the event of a bankruptcy or a sale, merger or acquisition, we may also transfer your PII to a separate entity. That entity will be responsible for ensuring that your PII is used only for authorized purposes and persons in a manner consistent with this Privacy Policy and applicable law.

## 6. COOKIES

We use industry standard technologies to collect non-personal identifiable information, and this may include sending cookies to your computer or mobile device. Cookies are small data files stored on your hard drive or in device memory that helps improve your experience. We may also collect information using web beacons (also known as “tracking pixels”). Web beacons are electronic images that may be used in connection with the Website or emails and help deliver cookies, count visits, understand usage and campaign effectiveness and determine whether an email has been opened and acted upon. For more information about cookies, and how to disable them, please see “**Opting Out**” below.

## **7. SOCIAL MEDIA**

The Website may include social media features, such as the Facebook Like button and widgets, such as the ShareThis button or interactive mini-programs that run on the Website. These features may collect your IP address, which page you are visiting on the Website, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on the Website. Your interactions with these features are governed by the privacy policy of the company providing it.

## **8. COMMERCIAL EMAIL MESSAGES**

By providing your email address to us, you affirmatively and expressly consent to receiving commercial emails from us and from our third party providers and affiliates. These parties may send you commercial emails in order to deliver information about the Website, information about developments relating to conveyor belts, special offers, and other information, including but not limited to updates to the Website. You may unsubscribe from these commercial emails at any time by clicking on the “unsubscribe” link included in any email or by contacting us via email. Opting out of promotional communications does not affect our communications with you via telephone or email related to any business we may have with you as an owner or other transactional emails.

## **9. THIRD PARTY WEBSITES**

The Website and the Content and comments submitted by Website users may contain links to other websites. We do not control, and make no representations whatsoever regarding such other websites or the products and services offered by or through websites accessed through links from the Website, even those with which we may have an affiliation. If you decide to access third party websites linked through the Website you do so at your own risk. You should carefully review the privacy policy and terms of any such website.

## **10. INFORMATION SECURITY**

We take reasonable measures to protect your PII in an effort to prevent loss, misuse, and unauthorized access, disclosure, alteration, and destruction.

Please be aware, however, that despite our efforts, no security measures are perfect or impenetrable and no method of data transmission can be guaranteed against any interception or other type of misuse. To mitigate this risk, you should (a) use secure usernames and passwords and carefully protect them from disclosure and (b) implement updated internet security and virus protection on your computer. If you suspect that your computer’s security or your information has been compromised or your password accessed or used by an unauthorized third party, please contact us immediately to have your password changed.

If we become aware of a security systems breach, we may attempt to notify you electronically so that you can take appropriate protective steps. We may post a notice through the Website if a security breach occurs. We may also send an email to you at the email address you have provided to use in these circumstances. Depending on where you live, you may have a legal right to receive notice of a security breach in writing.

You should also take steps on your own to protect your PII. Please refer to the Federal Trade Commission's website at <http://www.business.ftc.gov/privacy-and-security/consumer-privacy> for information about how to protect yourself against identity theft.

## 11. CORRECTIONS

If you want to view, delete, or modify your PII, you may do so by making a request as set forth below. Please note that we may be required to keep this information and not delete it (or to keep this information for a certain time, in which case we will comply with your deletion request only after we have fulfilled such requirements). When we delete any information, it will be deleted from the active database, but may remain in our archives.

As further detailed below under "How to Exercise Your Rights", we reserve the right to verify the identity of any person making a request to opt-out (see below) or to delete or modify PII; provided, however, that we will have no liability of any kind resulting from false or erroneous requests or any change or deletion made by us for any reason.

## 12. RETENTION

We store PII for only as long as reasonably necessary to fulfill the purposes described above, as we determine is necessary for business records, and as required under applicable law.

## 13. OPTING OUT

Please contact us at [Engage360 Tech Support] if you no longer wish to receive communications regarding the Website. **Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies.** If you choose to reject all cookies, you may be unable to use certain Website features. Some browsers have incorporated "Do Not Track" features. Most of these features, when turned on, send a signal or preference to the website or online service provider indicating that the user does not wish to be tracked.

It may take up to ten (10) days for us to process an opt-out request. We may send you other types of transactional and relationship email communications, such as service announcements, administrative notices, and surveys, without offering you the opportunity to opt out of receiving them. Please note that changing information in your account or otherwise opting out of receipt of promotional email communications will only affect future activities or communications from us. If we have already provided your information to a third party before you have changed your preferences or updated your information, you may have to change your preferences directly with that third party.

## 14. CALIFORNIA RIGHTS

The following provisions apply to residents of the State of California:

a. Do Not Track. Section 22575 of the California Business & Professions Code requires website and online service operators to disclose whether they honor web browser "Do Not Track" settings. We support and honor "Do Not Track" web browser settings. If you enable Do Not Track settings in the browser you are using, we will not collect, store, or use PII about websites you visit using that browser other than the Website. Other parties, however, may not honor Do Not Track signals. These parties may collect PII about your online activities over time and across different web sites when

you visit the Website, for example by using cookies on the Website. We have no access to or control over other parties' PII collection practices. You should carefully review the privacy policy and terms of any website you visit. For more information about Do Not Track, please visit [www.allaboutdnt.org](http://www.allaboutdnt.org)

b. CCCPA. You have the right under the California Consumer Privacy Act of 2018 (CCPA) and certain other privacy and data protection laws, as applicable, to exercise free of charge:

<p>Disclosure of Personal Information We Collect About You</p>	<p>You have the right to know:</p> <ul style="list-style-type: none"> <li>• The categories of Personal Information we have collected about you;</li> <li>• The categories of sources from which the Personal Information is collected;</li> <li>• Our business or commercial purpose for collecting or selling Personal Information;</li> <li>• The categories of third parties with whom we share Personal Information, if any; and</li> <li>• The specific pieces of Personal Information we have collected about you.</li> </ul> <p>Please note that we are not required to:</p> <ul style="list-style-type: none"> <li>• Retain any Personal Information about you that was collected for a single one-time transaction if, in the ordinary course of business, that information about you is not retained;</li> <li>• Reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered Personal Information; or</li> <li>• Provide the Personal Information to you more than twice in a 12-month period.</li> </ul>
<p>Personal Information Sold or Used for a Business Purpose</p>	<p>In connection with any Personal Information we may sell or disclose to a third party for a business purpose, you have the right to know:</p> <p>The categories of Personal Information about you that we sold and the categories of third parties to whom the Personal Information was sold; and</p> <p>The categories of Personal Information that we disclosed about you for a business purpose.</p> <p>You have the right under the California Consumer Privacy Act of 2018 (CCPA) and certain other privacy and data protection laws, as applicable, to opt-out of the sale of your Personal Information.</p>
<p>Right to Deletion</p>	<p>Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:</p> <ul style="list-style-type: none"> <li>• Delete your Personal Information from our records; and</li> <li>• Direct any service providers to delete your Personal Information from their records.</li> </ul> <p>Please note that we may not delete your Personal Information if it is necessary to:</p> <ul style="list-style-type: none"> <li>• Complete the transaction for which the Personal Information was</li> </ul>



	<p>collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us;</p> <ul style="list-style-type: none"> <li>• Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;</li> <li>• Debug to identify and repair errors that impair existing intended functionality;</li> <li>• Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;</li> <li>• Comply with the California Electronic Communications Privacy Act;</li> <li>• Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent;</li> <li>• Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us;</li> <li>• Comply with an existing legal obligation; or</li> <li>• Otherwise use your Personal Information, internally, in a lawful manner that is compatible with the context in which you provided the information.</li> </ul>
<p>Protection Against Discrimination</p>	<p>You have the right to not be discriminated against by us because you exercised any of your rights under the CCPA. This means we cannot, among other things:</p> <ul style="list-style-type: none"> <li>• Deny goods or services to you;</li> <li>• Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;</li> <li>• Provide a different level or quality of goods or services to you; or</li> <li>• Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services.</li> </ul> <p>Please note that we may charge a different price or rate or provide a different level or quality of goods and/or services to you, if that difference is reasonably related to the value provided to our business by your Personal Information.</p>

In the next section, we are reiterating information provided above in a format we believe is compliant with the CCPA.

<b>Categories of Personal Information under the California Consumer Privacy Act</b>			
<b><u>Category and sources of Information</u></b>	<b><u>How we use it</u></b>	<b><u>Types of individuals affected</u></b>	<b><u>How we share it</u></b>
<b>Identifiers</b> We collect this information from our users, customers, and business partners. We also generate identifiers internally.	To enable use of our sites, services, and products, to communicate with you, to understand how our users interact with our sites, and to improve our offerings	People who use our Website; create a user account; or send us an inquiry about a product, or service from us	We share this data with our service providers and with business partners, including those to whom you instruct us to send this information
<b>Personal information under <a href="#">California Civil Code section 1798.80</a></b> We collect this information from our users, customers, and business partners	To enable use of our sites, services, and products, to communicate with you, to understand how our users interact with our sites, and to improve our offerings	People who use our Website; create a user account; or send us an inquiry about a product, or service from us	We share this data with our service providers and with business partners, including those to whom you instruct us to send this information
<b>Protected classifications</b> We collect this information from our users and business partners	To understand how our users interact with our Website, and to conduct research into how our customers use our products and services	People who use our Website; create a user account; or send us an inquiry about a product, or service from us	We don't share unless you have consented or sharing is required to enable our service provider to complete your request
<b>Commercial information</b> We collect this information from our customers, and generate it internally during transactions with our customers	To transact with you if you use our services or products, and to enable transactions you've requested	People who use our Website; create a user account; or send us an inquiry about a product, or service from us	We share this data with our service providers and with business partners, including those to whom you instruct us to send this information
<b>Biometric information</b>	We don't currently collect this data and if that changes we will amend this privacy policy	None	None
<b>Electronic network activity information</b> We collect this information from our users and customers	To enable use of our Website, services, and products, to communicate with you, to understand how our users interact with our sites, and to improve our offerings	People who use our Website or mobile applications	We share this data with our service providers and with business partners, including those to whom you instruct us to send this information
<b>Geolocation data</b> We collect this information from our users and customers	To enable use of our Website, services, and products, to understand how our users interact with our sites, and to	People who use our Website and allow us to collect their location data	We share this data with our service providers

	improve our offerings		
<b>Audio, electronic, visual, thermal, olfactory, or similar information</b> We collect this information from our users and customers	To identify you, to enable use of our Website, services, and products, and for safety purposes	People who call us, email us, or interact with our Website in a manner than enables collection of such information	We share this data with our service providers
<b>Professional or employment-related information</b> We collect this information from our customers and business partners	To provide services or products you've requested	People who contact us in a business-to-business or employment context.	We share this data with our service providers and with business partners, including those to whom you instruct us to send this information
<b>Education information</b> We collect this information from our job applicants	For HR purposes and pre-employment review.	People who apply for employment with us.	We share this data with our service providers and with business partners, including those to whom you instruct us to send this information
<b>Inferences</b> We generate these internally	To understand how our users interact with our Website, to develop and offer more relevant and useful services and products, and to improve the products and services we offer	People who use our Website; create a user account; or send us an inquiry about a product, or service from us	We don't share unless a service provider is contracted to analyze such inferences for us.

## 15. INTERNATIONAL VISITORS

The Website is hosted in the United States and is intended for visitors located within the United States. If you choose to use the Website from the European Union or other regions of the world with laws governing data collection and use that may differ from U.S. law, then please note that you are transferring your PII outside of those regions to the United States for storage and processing. Also, we may transfer your data from the U.S. to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating the Website. By providing any information, including PII, to us, you consent to such transfer, storage, and processing.

## 16. HOW TO EXERCISE YOUR RIGHTS

If you would like to exercise any of your rights as described in this Privacy Policy, please:

- Complete a data subject request form available on our website at [link];
- Call us, toll-free, at [toll-free phone number]; or
- [Email/write to] us at [contact information].

Please note that you may only make a CCPA-related data access or data portability disclosure request twice within a 12-month period.

If you choose to contact directly by [website/email/phone/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 you request will be used solely for the purposes of verification.

#### **UPDATES TO THE POLICY**

We may update this Privacy Policy from time to time. When we do so, we will post the new Privacy Policy about the Website and your continued use of the Website is deemed to be acceptance of such updates or changes. We encourage you to check the date of our Privacy Policy when you access and use the Website for any updates or changes.

#### **15. CONTACT INFORMATION**

If you have any questions about this Policy, please contact us at Engage360 Tech Support

Last Updated: 12/10/2019.