

## **Notice of Collection of Personal Information and Privacy Policy Under The California Consumer Protection Act (CCPA)**

This Notice and Privacy Policy applies only to the collection of personal information from California residents on and from January 1, 2020. This Notice supplements our privacy notices accessible here, <https://www.agsystems.com/privacy.html> to provide California residents with information and rights required by the California Consumer Protection Act (CCPA).

### **1. OUR APPROACH TO PRIVACY**

Associated Global Systems (AGS) takes your privacy seriously. AGS understands transparency and respect are foundational aspects of longstanding relationships and, therefore, implements reasonable safeguards to protect the personal information you provide to us. We collect, use and share your personal information in accordance with this Privacy Policy and in order to carry out our lawful business activities.

This Notice and Privacy Policy describes the categories of personal information we collect, the business purposes for which we collect, use and share your personal information, with whom we share it, and your rights in personal information. We also describe how you can contact us about our privacy practices.

For purposes of this Notice and Privacy Policy, we refer to personal information according to the following definition given in the CCPA: “personal information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household. Personal information does not include publicly available information, information that is de-identified or aggregate consumer information, or information or rights that are outside the scope of the CCPA. By accessing our website, using our services or submitting personal information to us, you consent to the collection, use and sharing of such information as set forth in this Privacy Policy, as it may be updated from time to time.

### **2. WHO IS RESPONSIBLE FOR YOUR PERSONAL INFORMATION**

This Privacy Notice applies to the personal information that AGS collects and uses. References in this Privacy Notice to “we”, “us” or “our” mean AGS.

We control the ways your personal information is collected and the purposes for which your personal information is used by AGS. AGS entities responsible for the collection and use of your personal information for the purposes described in this Privacy Notice may be reached in the How to Contact Us section of this policy.

### **3. CATEGORIES OF PERSONAL INFORMATION WE COLLECT**

We collect personal information directly from you, for example when you use our website, fill out an agreement or web form, use our services or contact us. We also obtain your personal information from our Business Partners and Affiliates (such as dealers or distributors with whom we have business relationship, or from the entities with whom we have entered into a contract or for market survey purposes).

Categories of personal information we collect about you:

Identifiers: Physical location and contact information (name, mailing and shipping addresses (destination and origination), importer of record number, email address, IP address, phone number, fax number, passport information, customer ID).

Customer Information Under California Civil Code § 1798.80(e): This information comprises any information that identifies, relates to, describes or is capable of being associated with you in our records. This category may include your signature, and contact, shipment and financial information collected when we set up your account or when we process transactions or make a shipment. Credit card numbers of individuals are collected on occasion for purposes of paying for our services.

Characteristics of Protected Classifications under California or Federal law: This includes demographic information, such as birthdate or gender, that you may voluntarily provide to us.

Commercial Information: Information concerning products or services purchased from us, your inquiries, regional location and dealer transactions.

Internet and electronic history: Information regarding your use of our websites collected through use of cookies and tracking technologies. We collect personal information by using automated means, such as cookies. The information we collect in this manner may include: IP address, browser type, operating system, referring URLs and information on actions taken or interaction with our websites.

Visual Information: When you enter our warehouses or other facilities, we may collect video information for security purposes.

Professional or Employment Related Information: Your employer and related payor information concerning certain shipments. For example, we may collect employment related information when we contract with your employer to ship certain household goods. For job applicants, we collect professional or employment information you provide to us concerning your qualifications.

Education information. For job applicants, we collect educational information you provide to us concerning your qualifications.

In the past twelve (12) months, we have collected the following categories of personal information: identifiers, customer information described under § 1798.80(e) of the California Civil Code, protected characteristics, commercial information, internet activity, visual information, professional or employment related information, and education information.

#### **4. OUR BUSINESS REASONS FOR COLLECTING AND USING YOUR PERSONAL INFORMATION**

##### How we use collected data:

We will process (collect, store, share and use) the personal information you provide in a manner compatible with applicable law. We will endeavor to keep your information accurate and up to date, and not keep it for longer than we believe is necessary. We pledge to retain information in accordance with the law applicable to us, such as information needed for income tax, regulatory and audit purposes.

AGS uses your personal information for providing you with goods and services you have requested or pursuant to a contract, for marketing your products or services, for regulatory purposes and for other lawful business purposes as specified below.

##### Fulfilment of Your Request.

When you use our inquiry, contest or survey functionality on our websites, we may use submitted information to supply you with relevant product and service offerings to better respond to your specific product or service inquiries or respond to complaints.

##### Customer Service and Support.

We collect and use information about you to support our customer service and support activities or related transactions. This may include, but is not limited to, warranty services, financing or purchasing, product delivery and maintenance support.

##### Job Applications.

In addition, AGS may use the personal information of job applicants for purpose of recruitment activities. Where this occurs a separate privacy notice will be available at the point of submission of your details.

##### Legal Requirements.

In other instances, the collection of your personal information may be necessary to comply with an applicable law, rule or regulation. For example, certain identifying information is required for customs purposes. You may not be able to opt-out of this processing, or your choice to opt-out may impact our ability to perform a contractual obligation otherwise owed to you.

#### To Communicate with You.

AGS may use your personal information to communicate with you concerning the transaction you requested, to fulfill a contract or to maintain an ongoing relationship with you.

#### To Complete the Services Requested or Performance of a Contract.

AGS may use your personal information to complete the services requested or for the performance of a contract to which you are subject. For example, identifiers, such as name, physical address and other contact information, may be needed to effectuate a shipment. Customer data shall be used in providing services (e.g., small-parcel delivery, removal, and travel services), and collecting debts and fulfilling obligations, and carrying out other operations incidental to these purposes.

#### To Market our Services and Products.

In still other instances, AGS may process your personal information based on AGS' s legitimate interests in communicating with you about our products and services. You have the right to opt-out of all such marketing communications. You may do so by contacting us as described in the "How to contact us" section.

#### Detecting Security Incidents

We may use your personal information, including video information and internet related activity related to use of our websites, to detect security incidents and protect against unlawful activity.

#### To Improve the Functionality and Effectiveness of our Websites and Online Services.

We use cookies and other tracking technologies to collect information about your usage and preferences, your visit to our websites, and to remember you in order to improve our websites, online services and their effectiveness. If you do not want our websites to place a cookie in your browser or on your hard drive or mobile device, you may be able to turn that feature off on your computer or mobile device. Please consult your Internet browser' s documentation for information on how to do this. Please note, however, that without cookies you may not be able to use all of the features of our websites or online services.

### **5. ARE WE GOING TO SHARE YOUR PERSONAL DATA WITH ANYONE ELSE?**

We do not sell your personal information to third parties.

AGS may share your information with the following parties:

Service Providers: Dealers, business partners and affiliates who provide some portion of our services, and service providers to provide products and services relating to the sale of AGS products and services, internal company

processes or the servicing of your accounts or transactions, IT providers and shippers. When we disclose personal information for a business purpose to a service provider, we have an agreement that the personal information will be used only for purposes of performing the services requested and will not be disclosed for other purposes.

Third Parties: Auditors, regulators (e.g., customs officials) and other entities, where legally required or as needed to protect our rights or property or in connection with the sale of assets and/or the company.

In the past twelve (12) months, we have shared the following categories of personal information: identifiers, customer information described under section 1798.80(e) of the California Civil Code, protected characteristics, commercial information, internet activity, professional or employment related information, and education information. We have shared this information during the past (12) months with the following categories: service providers and third party businesses and regulators.

## **6. YOUR RIGHTS**

Under the California Consumer Protection Act, you have the following rights in personal information held by us:

- You have the right to request that we disclose to you the personal information we collect, use, disclose and share. You may request (i) the categories of personal information that we have collected about you; (ii) the categories of sources from which the personal information is collected; (iii) the business or commercial purpose for collecting or sharing personal information; (iv) the categories of third parties with whom we share your personal information; and (v) the specific pieces of personal information that we have collected about you.
- You have the right to receive your personal information in a portable format that allows you to transmit the information to another entity.
- You have the right to request deletion of personal information under certain circumstances. For example, we may not be required to delete personal information if we need to retain the information to complete the transaction for which the personal information was collected, perform on a contract with us, or to comply with a legal obligation.
- You have the right not to receive discriminatory treatment for the exercise of any of these rights. We will not discriminate against you because you have exercised your rights hereunder.

You may submit verifiable requests concerning any of your rights by contacting us by telephone or email (See the How to Contact Us section below). We will use reasonable methods for verifying that the person making a request to know, data portability or a request to delete is the individual about whom we have collected personal information. This may involve, depending on the nature of the request, confirming that the email address provided corresponds with our records concerning the individual. Additional reasonable measures may also be required to verify the identity of the person making the request depending on the circumstances. For online requests to delete, you will be required to submit the request to delete, and then separately confirm that you want your personal information deleted. To the extent that you wish to use an authorized agent to make requests concerning the rights set forth above, you will need to provide us either with a power of attorney or, alternatively, with written authorization to communicate with your authorized agent.

We will (i) confirm receipt of requests to know, data portability or to delete within 10 days of the request; and (ii) generally respond to requests to know, data portability or to delete within 45 days of the request. If we need additional time to respond to your request beyond the 45 days, we will provide you with notice explaining the reasons we need more time, and we will then take up to an additional 45 days to respond to your request.

You can exercise your right and choices either by using the specific links provided in this page (see below) or by contacting us as specified in the section How to Contact Us.

Please note that job applicants do not have rights to deletion or to request disclosure/data portability under the CCPA.

## **7. INTERNATIONAL DATA TRANSFERS**

We may transfer the personal information we collect about you to recipients in a third country (including countries outside the United States) or international organizations. Those countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your information to other countries, we will protect that information in accordance with the applicable data protection law, utilizing appropriate safeguards. In addition, we will follow the steps described in this Privacy Notice or as otherwise disclosed to you at the time the data is collected.

## **8. DATA RETENTION**

AGS stores personal information only for as long as it is necessary for the fulfilment of the purpose for which the personal information was collected, unless otherwise required or authorized by applicable law. We take measures to destroy or permanently de-identify personal information if required by law or if the personal information is no longer required for the purpose for which we collected it.

## **9. UPDATES TO OUR PRIVACY POLICY**

This Privacy Policy may be updated periodically and without prior notice, to reflect changes in our personal information practices. We will post a prominent notice on relevant websites to notify you of any significant changes to our Privacy Policy and indicate the updated date.

## **10. ACCESS BY PERSONS WITH DISABILITIES**

Persons with disabilities who need assistance accessing this policy may contact us as provided for in section 13, and depending on your individual needs, we will grant reasonable requests to furnish this policy in an alternative format.

## **11. CHILDREN**

We do not knowingly collect personal information from children under the age of 13. If you are under 13, please do not give us any personal information. If you are a parent or legal guardian, we request that you help enforce our privacy policy by instructing your children never to provide personal information without your permission. If you have reason to believe that a child under the age of 13 has provided us with their personal information, please contact us using the above contact information and we will seek to delete that information in our possession. We do not sell any personal information, including the personal information of minors under 16 years of age.

## **12. THIRD PARTY WEBSITES**

This website may from time to time contain links to other external websites. This Privacy Policy does not apply to third-party websites. We do not control and are not responsible for the privacy practices or the content of third-party websites.

## **13. HOW TO CONTACT US**

If you have any questions or comments about this Privacy Notice or wish to exercise any of the rights listed above, feel free to contact Personal Data Complaints and Inquiry Desk at [privacy-info@agsystems.com](mailto:privacy-info@agsystems.com) You may also contact us at 1-800-645-8300.

Effective date: January 1, 2020

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