

Great Lakes Case & Cabinet Co., Inc.

Privacy Policy Statement

Effective Date: February 1, 2021

This Privacy Policy Statement (the “Policy” or the “Privacy Policy” herein) describes how Great Lakes Case & Cabinet Co, Inc. and its U.S. operating subsidiaries and affiliates, including Great Lakes Data Racks & Cabinets (collectively, “GLCC” or “Company” herein), collects, uses, shares and protects information from and about you, along with choices you can make about such information. It also contains other important privacy disclosures, such as how we may update the Privacy Policy and how you can contact us.

I. SCOPE

This Privacy Policy applies to your interaction with the Company online. It covers the privacy practices of Great Lakes Case & Cabinet Co, Inc. and its U.S. operating subsidiaries and affiliates, including Great Lakes Data Racks & Cabinets (collectively, “GLCC” or “Company” herein), except as outlined below. It applies to personal information about our current or prospective customers, visitors and applicants.

In some cases, we may provide additional details about privacy practices specific to a particular operation or location. For example, our Company website(s) may provide additional privacy details unique to that website, or some locations may post additional privacy details specific to that location or an event.

This Privacy Policy *does not apply* to:

- Certain U.S. subsidiaries, affiliates and product lines, which may be subject to their own privacy statements and policies.
- Credit-related products, which are covered by an issuing banks' privacy notices that appear on credit applications or that you receive in connection with your credit accounts.
- Your interactions with third parties or their websites that are linked to or accessible from Company's website(s) or that are operated by unaffiliated parties, even though the website may contain references to GLCC.
- Practices of our international subsidiaries and affiliates, as well as their subsidiaries, related entities and affiliates.
- Company's employment-related records.

II. WHAT INFORMATION WE COLLECT

We collect the following categories of information in order to provide products and services to you, to communicate with you, to enhance our products, services and operations, and for other operational, legal and compliance purposes:

- » **Identification information** that can be used to identify you, such as your name, alias, address, phone number, email address, payment information, signatures or other identifiers. We may also collect online identifiers, such as your IP address, when you browse or use our website(s). We may collect government-issued ID for certain types of transactions - but please provide government-issued ID information only if we ask you to.
- » **Commercial information**, such as products or services you purchased or considered purchasing.
- » **Protected class information under state or federal laws**, such as age, gender and family status.
- » **Online activities information**, such as browsing history, search history and other information when you interact with our website(s), application(s) and advertisement(s).
- » **Geolocation data**, including precise geolocation data if you allow our website and application to collect it.
- » **Audio, electronic or visual information**, such as audio or video recording when you call us or when you come to our facilities/locations, but please note we may not be able to associate such recordings with you.
- » **Professional or employment-related information**, such as when you provide us the information in a customer survey.
- » **Education information**, such as when you respond to a customer survey.
- » **Inferences or preferences** we learn or infer about you.
- » **Other personal information**, if it identifies, relates and can be reasonably associated with or linked to you (or your household).

We do not knowingly collect or disclose personal information from children under the age of 18 without parental or guardian consent. If a child under the age of 18 has provided us with personally identifiable information, we ask that a parent or guardian contact us so that the information can be deleted.

III. WHAT ARE THE SOURCES OF YOUR INFORMATION

We collect different types of information about you from a number of sources, including information you provide to us, information we automatically collect, information we obtain from other sources (specified below), and information we derive or infer about you.

A. Information You Provide

You may choose to provide us with information when you interact with us. Examples include:

- **Identification information.** You may provide your contact information in case we need to reach out to you. You may also set up your login and access credentials when creating or accessing your Company account. To complete transactions, we may collect your payment information

(e.g., credit or debit card numbers) and signatures. We may need your government-issued ID number or date of birth for certain types of special transactions.

- **Commercial information.** You may provide or generate commercial information regarding your Company purchases, returns, exchanges, warranties and rebates.
- **Protected class information under state or federal law.** You may provide your protected demographic information, including age, gender, marriage and family status, such as when you complete a survey from us.
- **Your preferences and inferences.** You may let us know your preferences in a survey, contest, promotion or sweepstakes or other content you submit, such as product reviews.
- **Professional or employment-related information.** You may also provide other professional or employment-related information when you respond to our surveys.
- **Education information.** You may provide education information in customer surveys.
- **Other personal information,** such as your medical and insurance information, if you submit a claim to us.

B. Information We Collect by Automated Means

We collect information by automated means online and offline. When you use our website(s), GLCC and our partners may collect certain information by using cookies and other technologies (as further described in this Policy). If or when you visit our facility/location or call our customer care hotline, we may collect audio or video information.

We collect the following information via automated means:

- **Identification information,** such as your IP address, device ID, cookie ID, mobile advertising identifier or pixel identifier.
- **Online activities,** such as browse and search history, interactions with our website(s), application(s), clickstreams or other information about your online interactions.
- **Geolocation data.** With your consent, we may collect certain information about your precise location through our website(s) to help you locate the nearest Company facility/location or for analytic purposes.
- **Audio, video or electronic information,** such as audio or video recording of the conversations for quality control, training, security and analytic purposes when you call our customer service centers or other phone support lines. We may also use video monitoring and other tracking technologies at GLCC's facilities/locations to enhance security, protect against theft and other crimes, and perform similar analytics. However, we may or may not be able to associate such information with you.

C. Information We Collect From Other Sources

- **Identification information.** We may collect your contact information from Company affiliates, acquired businesses, business partners, public sources or other individuals, such as through “Refer a Friend” programs or if someone purchases a product and asks that it be delivered to you.
- **Commercial information.** We may obtain your commercial information, such as your purchase history, from Company affiliates, acquired businesses or business partners.
- **Inferences or preference information about you, protected class information under state or federal laws, professional or employment-related information, education background and geolocation information.** We may collect inferences or preference information about you from business partners, such as data analytics or survey vendors. We may use such information to conduct aggregated analyses of our customer composition, and we may collect your interest and preference information to recommend products or services that may interest you. We may also learn about your preferences from public sources, such as information you submit in a public forum (e.g., a customer review).

D. Information We Generate or Derive

- **Inferences or preference information about you.** We may generate or derive some information about you based on other information we collect. For instance, we may analyze your information and infer your shopping preferences to provide tailored recommendations to you. We may also conduct analyses based on aggregated or de-identified information.

IV. WHY WE COLLECT YOUR INFORMATION

We use your personal information for various business or commercial purposes, including fulfilling products and services, communicating with you, supporting and enhancing our business functions and for other legal, compliance and security purposes.

A. Fulfill Products, Services and Transactions

We may use your **identification information, commercial information, online activities, geolocation information, audio/video, geolocation and other personal information** to provide products and services to you, such as:

- Provide and deliver products and services, fulfill your orders and transactions, manage returns and exchanges.
- Process, record and track your purchases, payments, returns, warranties and rebates.
- Create and manage your account registrations or benefit or reward program enrollment.
- Conduct and administer contests, surveys and sweepstakes.
- Provide you with navigation and mapping services and help you find facility location(s) near you, or location of pending orders or deliveries.
- Identify and verify your identity when needed to provide you with products and services or access to our systems.

B. Facilitate Customer Communication and Outreach

We may use your **identification information, commercial information, online activities, characteristics of protected class information under state or federal law (e.g., gender), inference and preference, audio/video, professional or employment-related information, education information, geolocation and other personal information** to facilitate and tailor our outreach to you, such as:

- Communicate with you through various channels with transactional or promotional information, such as transaction confirmation and reminder, newsletters, and other messages.
- Evaluate and respond to your requests, inquiries and applications.
- Administer programs for product reviews and surveys as submitted by you and other customers.

C. Enhance Our Products, Services and Operations

We may use **all categories of information** we collect listed above to enhance our products, services and operations:

- Conduct research and internal analytics, develop new products and services, perform market research and data analytics, and analyze our products, services, and website(s).
- Customize your experiences online and in our facilities/locations, including customized advertisements and offers.
- Determine and manage the effectiveness of our advertising and marketing.
- Administering our website(s), and perform accounting, auditing, billing, reconciliation and collection activities.

D. Comply With Legal, Compliance, Law Enforcement and Security Requirements

We may use **identification information, commercial information, online activities, geolocation, audio/video and other personal information** for legal, compliance, fraud prevention and security purposes:

- Comply with and enforce applicable legal requirements, industry standards and our policies and terms, such as our website Terms and Conditions of Use.
- Assist law enforcement and respond to regulatory inquiries.
- Detect security incidents, protecting against malicious, deceptive, fraudulent or illegal activity and prosecute those responsible for that activity.

V. HOW WE SHARE INFORMATION

We share your personal information with unaffiliated entities (companies outside the GLCC family of companies) with your proper implied or express consent. Specifically, we share your personal information

to conduct business with service providers and business partners, comply with legal requirements and transfer our business.

A. Service Providers and Business Partners

We may disclose your personal information to companies that provide various services to us in areas, such as installation, repair, warranty, order processing and fulfillment, information technology, marketing, customer service, data analytics, research and enhancement, fraud prevention, legal, compliance and risk management. These companies may need access to information about you in order to perform their functions but are generally not authorized to use the information we disclose to them for any other purpose.

In limited cases, we may disclose information about you to a third party who may also use the information for their own specific purposes. For instance, we may provide your information to a supplier in connection with product warranty or safety issues, with a business partner who is jointly providing or promoting a product or service to you, or with a social media or online advertising technology company to serve tailored commercial information to you.

B. Legal, Enforcement, Security and Investigation

We may disclose information about you (1) if we believe we are required to do so by law, regulation or legal process, such as a court order or subpoena; (2) as we deem appropriate or necessary in response to requests by government agencies, such as law enforcement authorities or tax authorities; (3) when we believe disclosure is appropriate or necessary to protect the rights, property or safety of the Company, our employees, our customers or others, including to prevent physical, financial or other harm, injury or loss or to collect debt you owe; or (4) in connection with an investigation of suspected or actual unlawful activity.

C. Sale or Transfer of Business or Assets

We reserve the right to transfer personal information we have about you in the event we sell or transfer all or a portion of our business or assets (including, without limitation, in the event of a reorganization, dissolution or liquidation).

VI. HOW WE PROTECT INFORMATION

We maintain administrative, technical and physical safeguards designed and intended to protect personal information against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. Despite these safeguards, due to inherent uncertainty in the use of the Internet and information systems and the potential for unlawful attacks by third parties, we cannot guarantee that the use of our systems or websites will be completely safe or secure.

Information we collect and use may be transferred, stored and accessed globally to support our operations. We retain information for as long as it is needed or useful to provide and improve our products and services, comply with our legal obligations, resolve disputes and enforce our agreements.

VII. HOW TO EXERCISE YOUR PRIVACY CHOICES

A. Access, Delete or Restrict Certain Sharing of Your Personal Information

When required by law, you may request to exercise your privacy rights including access, delete or restrict certain use or sharing of your personal information. When we are not legally required to do so, we strive to comply with reasonable requests, but there may be a delay in responding to such requests. For your protection, we may need to verify your identity before fulfilling certain requests.

To exercise your privacy right to access or delete your personal information, please email your request to glcc@greatcabinets.com or call 1-866-879-4522.

To limit certain data sharing whereby a business partner may use the shared information for additional purposes and for valuable considerations, please first adjust your cookie preference(s) as set forth in this Policy, and then submit your request via the email or hotline above. It will not opt you out of the use of previously collected and shared personal information or all interest-based advertising.

You may access or modify your online account profile information and view your order history when you log into your online account.

B. Email

To stop receiving marketing emails, you may click on the "Unsubscribe" link in any marketing email you receive from us and update your preferences on the resulting webpage. You can also email glcc@greatcabinets.com with the phrase "REMOVE FROM NEWSLETTER LIST" in the subject line. To provide products and services, we may continue to send transactional emails.

C. Mobile

- **Text messages.** We may send text messages with your proper consent. To stop receiving marketing text messages from Company, please reply STOP to the Company's marketing text message. Please note this preference will only apply to the phone number in receipt of the text.
- **Push notifications.** To the extent applicable, to opt-out from Company's push notifications, please adjust the permissions in your mobile device. This opt-out does not apply to in-app notifications (if applicable).

D. Interest-Based and Other Targeted Advertising

You can adjust your cookie preference as set forth in this Policy below. Essential and functional cookies cannot be disabled nor can the tool be used to block cookies on third-party websites linked from our website. You can also opt-out of receiving online, interest-based and other targeted advertising from the Digital Advertising Alliance program's Consumer Choice webpage at <https://optout.aboutads.info/?c=2&lang=EN#!%2F>.

The opt-out is associated with the browser that you use to set those preferences, not with you as an individual. If you clear cookies on your browser after opt-out, your browser will no longer remember your preference, and you will need to reset your preference.

E. Website Analytics Services

We use certain analytics services, such as Google Analytics, to gather information about our site visits or usage. To learn more about your privacy choices on Google Analytics, including opting out of personal data collection by Google Analytics, <https://support.google.com/analytics/answer/2838718?hl=en>.

VIII. OTHER IMPORTANT CONSIDERATIONS

A. Do Not Track

We do not process or respond to “Do Not Track” signals from your browser or other mechanisms that enable consumer choice regarding the collection of personal information about one's online activities over time and across third-party websites or online services.

B. Cookies and Other Technologies

Cookies refer to small packets of data that websites send to your computer or other Internet-connected devices. GLCC and our business partners use them for different purposes. These technologies can uniquely identify your browser and log information, such as your device type, system and browser information, IP address, system language, location and your interactions with the site. Like other websites, we need some essential cookies for our website to function properly. We also use some functional cookies to pre-populate your log-in ID to make it easier for you, or to help us remember where you left off when you shopped, so you do not have to restart all over again. We may use browser cookies, flash cookies and other types of local storage.

GLCC and our business partners also use cookies with other technologies, such as tags, beacons or pixels. They allow us to count visitors to our webpages, evaluate the effectiveness of our promotional campaigns or recommend relevant products and services to you when you browse social media or other websites. We think these technologies create meaningful interactions with you and are helpful, but you can let us know that you prefer otherwise by opting-out from these advertising cookies and technologies as further set forth in this Policy below. You can find more information and options in Interest-Based Advertising and Other Targeted Advertising section below.

We may also use third-party web analytics services in our online services, such as those of Google Analytics, to help us analyze how users use our online services.

C. Interest-Based Advertising and Other Targeted Advertising

We collect data about your activities on our websites for use in providing tailored advertising, and we may share information about activities on our websites with advertising networks administered by third parties. These ad networks track your online activities over time and across websites by collecting information through automated means, and they use this information to show you advertisements that are tailored to your individual interests. As a result, you may see certain ads on other websites based on prior activities on our websites and vice versa.

We may also utilize third-party services that may allow us to associate your prior Company online or facility transaction data, operating system, user-agent string, IP address, internet browser, installed fonts and similar information with an anonymous ID, which can then be used to target Company advertising to you on other websites and online platforms. These services may use anonymous IDs that do not contain any personal information or otherwise identify you.

To provide you with a consistent shopping experience, we may also associate various devices you utilize (e.g., smartphones, tablets and desktop computers) by using the information we collect about you. We may combine information we collect from your devices with other information we have about you, such as your Company account information, your interaction with our sites and services and your transaction history.

The Digital Advertising Alliance (DAA) has created guidance for online advertisers and provided a mechanism for such advertisers to comply with users' choices regarding interest-based ads. To learn more about ad networks, including how to opt-out of interest-based ads, please go to <https://optout.aboutads.info/?c=2&lang=EN#!%2F>.

D. Social Media Widgets

Our online services may include social media features (e.g., a Facebook “Like” button). These features are connected to third parties and may allow such third parties to collect certain information, such as your IP address and which pages you visit on our websites. These social media features are not operated by GLCC. Your interactions with these features are governed by the privacy policies of the company providing the features.

E. Links to Other Websites

Our website(s) may link to other websites for your convenience and information. For instance, they may link to websites of product suppliers, manufacturers and service providers. We are not responsible for the content or privacy practices of any website that we do not control and that does not point to this Privacy Policy.

ADDITIONAL NOTICE TO CALIFORNIA CUSTOMERS

A. Types of Personal Information Collected, Sources of Collection and Purposes of Use

To view the types of personal information collected, sources of collection and purposes of use, please refer to this Policy as set forth above and herein.

B. Categories of Personal Information Disclosed for Business Purposes

We typically disclose the following categories of personal information to the following categories of entities for business purposes:

<u>Categories of Entities</u>	<u>Categories of Personal Information</u>
Analytics and Research Vendors	<ul style="list-style-type: none"> - Identifiers - Online Activities - Geolocation Data - Commercial Information - Protected Class Information Under the California or Federal Law - Professional or Employment-Related Information

Installation, Repair and Warranty Services Companies	<ul style="list-style-type: none"> - Identifiers - Commercial Information - Inferences
Order Processing and Fulfillment Vendors	<ul style="list-style-type: none"> - Identifiers - Online Activities - Commercial Information
Fraud Prevention, Legal, Compliance and Risk Management Vendors	<ul style="list-style-type: none"> - Identifiers - Online Activities - Audio/Visual Information - Commercial Information - Professional or Employment-Related Information - Protected Class Information Under the California or Federal Law - Other Categories of Personal Information Not Listed Above or Below and Described in Section 1798.80(e) of the California Civil Code
Information Technology Vendors	<ul style="list-style-type: none"> - Identifiers - Online Activities - Audio/Visual Information - Commercial Information - Professional or Employment-Related Information - Protected Class Information Under the California or Federal Law - Other Categories of Personal Information Not Listed Above or Below and Described in Section 1798.80(e) of the California Civil Code
Financial Institutions	<ul style="list-style-type: none"> - Identifiers - Inferences - Commercial Information - Other Categories of Personal Information Not Listed Above or Below and Described in Section 1798.80(e) of the California Civil Code
Marketing and Advertising Vendors	<ul style="list-style-type: none"> - Identifiers - Online Activities - Commercial Information - Professional or Employment-Related Information - Protected Classes Under the California or Federal Law - Inferences
Government Entities (when requested)	<ul style="list-style-type: none"> - Identifiers - Online Activities - Commercial Information - Professional or Employment-Related Information - Protected Classes Under the California or Federal Law - Other Personal Information

C. Categories of Personal Information Shared That May be Deemed As a “Sale” Under the California Consumer Privacy Act (“CCPA”)

We do not sell your personal information for payment or discount. We use certain advertising cookies for online targeted marketing and its effectiveness measurement. These cookies allow Company and its business partners to collect and share personal information with digital advertising participants, which may use the information for additional purposes. We may also disclose your information to our business partners who may use it for additional purposes relevant to our products or services (e.g., joint marketing, joint product/services offering). These disclosures may be deemed as a “sale” under the CCPA if such disclosure is for any valuable consideration, even if we do not receive any payment or discount. If you would rather that we do not share your information for these purposes, see how to opt-out below.

<u>Categories of Third Parties</u>	<u>Categories of Personal Information</u>
Service Companies (e.g., for joint marketing under certain circumstances)	- Identifiers - Commercial Information - Inferences
Financial Institutions (e.g., for joint marketing and analytics on private-labeled credit cards)	- Identifiers - Inferences - Commercial Information - Other Categories of Personal Information Not Listed Above or Below and Described in Section 1798.80(e) of the California Civil Code
Marketing and Advertising Networks and Social Media (e.g., for serving you relevant ads)	- Identifiers - Online Activities - Commercial Information - Professional or Employment-Related Information - Protected Classes Under the California or Federal Law (e.g., age range, gender) - Inferences
Information Technology Vendors (e.g., for system and service improvements)	- Identifiers - Commercial Information - Online Activities

D. Your Privacy Rights Under the CCPA

You may request for exercising your privacy rights, including access, delete or opt-out from sale of your personal information:

- **Access your personal information.** You may obtain a copy of your personal information to learn more about the categories and specific pieces of personal information we collect about you, the categories of sources from which personal information is collected and the categories of entities

with whom we share personal information. You can also learn about categories of entities who may use your personal information for additional purposes relevant to our products or services (e.g., joint marketing, joint product/services offering) for valuable considerations. You may request for accessing your personal information twice in a 12-month period. The information may be delivered by mail or electronically at your request.

- **Delete your personal information.** You may request that Company delete your personal information. **This may impact our capability to provide products or services to you.** Please also note, we need to keep certain information when permitted by law to complete the transactions, detect security incidents, prevent fraudulent or illegal activities, identify and repair errors, comply with laws and regulations, and for other solely internal and lawful purposes.
- **Opt-out from sale of your information. We do not sell your information for payment.** We use cookies and share your information for joint marketing or analytics, which may be deemed as a “sale” under the CCPA if such disclosure is for any valuable consideration. You can opt-out from online, interest-based and targeted advertising by adjusting your cookie preferences (as set forth in this Policy). This is associated with the browser that you use to set those preferences, not with you as an individual. If you clear cookies on your browser after opt-out, your browser will no longer remember your preference, and you will need to reset your preference. You may also not be able to receive information about new products or services we jointly offer with our business partners. It will not opt you out of the use of previously collected and shared personal information or all interest-based advertising.

How to Submit Privacy Request(s)

- **Access or delete.** To access or delete your personal information, please enter email us at glcc@greatcabinets.com to make your request or call 1-866-879-4522. We need your contact information, such as name, address, phone number and email, to submit your request and verify your identity for access or deletion requests.

For your information security and privacy, we leverage our identity verification business partner to verify requestor identity. With your consent, we may send you a text to your mobile number to verify your identity. Our ID verification service provider may also present you with several questions to which only you may know the answers.

- **Opt-out from sale.** To “opt-out from sale” under the CCPA, please first adjust your cookie preference for Company’s sites as set forth in this Policy, and also submit an opt-out request via the email address or the hotline above.
- **Agent.** You may designate an agent to submit privacy requests on your behalf, but for your protection, we may need to verify your identity directly with you before fulfilling certain requests, and we will deliver your personal information directly to you (if requested). We need your agent's contact information, and your agent needs to have your information ready when submitting the request.
- **No discrimination.** You have the right to be free from discrimination in product quality, goods or services. But Company maintains the right to offer a different price, rate, level or quality of goods or services if that price or difference is directly related to the personal information value provided to us.

Financial Incentive Programs. We provide price discounts, coupons, services and other perks for (1) Company account holders and members of our loyalty programs; (2) military and other discount holders; and (3) members of our mailing and email list (collectively “programs”). Through these offerings, consumers provide us with some personal information (e.g., names, emails, phone numbers, address, online activities, transaction history, etc.) when they opt-in to our programs. There is no obligation to opt-in and consumers may opt-out at any time. The details of each program are contained in the program offering. We offer these programs, among other things, to identify you, to provide you with tailored products and services, and to enhance our relationship with you. We incur expenses when providing and operating these programs. The value to our business of any individual consumer’s personal information is based on specific facts such as whether and to what extent you take advantage of any offerings and whether and to what extent you opt-out of any offerings. Our ability to create any value from the programs is dependent on our ability to leverage said intellectual properties. We do not calculate the value of consumer data in our accounting statements. We make this good faith estimate for California residents. To the extent we create overall value from our programs to our business that could be directly or reasonably related to the value of customer data, the method for calculating the same would include: (1) the expenses associated with the offer, provision or imposition of any financial incentive or price or service differences, such as our intellectual property, data analytics and marketing operations, (2) the expenses related to the collection, retention and enhancement of customer’s personal information and (3) all other expenses reasonably related to the programs. You can opt-in to, or opt-out of, our programs at any time through the same means they are offered or by contacting us at glcc@greatcabinets.com or calling 1-866-879-4522.

E. Your Privacy Right Under the California Shine the Light Acts

How to Know If My Information Has Been Disclosed for Direct Marketing Purposes: Subject to certain limitations under California Civil Code § 1798.83, if you are a California resident and have an established business relationship with us, you may ask us to provide you with (i) a list of certain categories of personal information that we have disclosed to certain third parties for their direct marketing purposes during the immediately preceding calendar year and (ii) the identity of certain third parties that received personal information from us for their direct marketing purposes during that calendar year. To make such a request, please contact us as follows:

Privacy Office – California Privacy Rights
Great Lakes Case & Cabinet Co., Inc.
4193 PA Route 6N
Edinboro, PA 16412

UPDATES

This Privacy Policy may be updated periodically and without prior notice to you to reflect changes in our information practices or relevant laws. We will post a notice on the Company website and other websites that point to this Privacy Policy to notify you of any substantive changes to the way we collect and use information. We will indicate at the top of the Privacy Policy when it was last updated.

HOW TO CONTACT US

If you have questions or comments about this Privacy Policy or if you would like us to update information we have about you or your preferences, please contact us as indicated below.

Great Lakes Case & Cabinet Co, Inc.
Privacy Office
4193 PA Route 6N
Edinboro, PA 16412
glcc@greatcabinets.com

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