

PRIVACY POLICY

Last Updated / Effective Date: October 1, 2019

ORBIS Corporation (“ORBIS,” “we,” “us,” or “our”) takes your privacy seriously. This Privacy Policy describes the information that is collected through your interactions with ORBIS and this website (“Site”), and how that information is used, shared, and protected. In addition, our relationship with our customers is governed by additional separate agreements executed with such customers, and our relationship with our employees is governed by separate policies and handbooks.

This Privacy Policy applies to the following website: <http://www.orbiscorporation.com>. This Privacy Policy does not apply to the information gathered by ORBIS' affiliates Menasha Corporation or Menasha Packaging Company, LLC. Please see the websites for those affiliates for their applicable privacy policies. **Please see the end of this Privacy Policy for additional terms that apply to users in the EEA and Canada.**

BY ACCESSING OR USING THIS SITE, YOU REPRESENT THAT YOU HAVE READ AND YOU UNDERSTAND THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THE TERMS OF THIS PRIVACY POLICY, DO NOT ACCESS THIS SITE OR SEND US PERSONAL INFORMATION.

1. **CONSENT TO ORBIS’ TERMS OF USE.** If you use this Site, you must comply with our Terms of Use found at <https://docs.orbiscorporation.com/termsfuseUSwebsite> (“Terms of Use”). If you do not agree to the Terms of Use, you may not use this Site.
2. **MODIFICATIONS TO THIS PRIVACY POLICY.** ORBIS reserves the right to modify or amend this Privacy Policy at any time. All changes will be effective immediately upon posting to this Site. Material changes will be conspicuously posted on this Site. If you do not agree to any modified terms posted to this Site, do not access this Site or send us any Personal Information (defined below).
3. **COLLECTION OF INFORMATION.** ORBIS may collect and store the following types of information about you:
 - A) **Personal Information.** ORBIS may collect and store personal information, which is information that can be used to identify, locate, or contact a person, such as your name, email address, phone number, and mailing address (“Personal Information”).
 - B) **Employment Information.** When you access the Careers page on this Site, you are directed to Menasha Corporation's website. Menasha Corporation is an affiliate of ORBIS. Menasha Corporation uses a third-party service provider, Enlighten Solutions, LLC d/b/a SourceMob, to host the Menasha Corporation Careers page.
 - C) **Information Automatically Collected.** ORBIS may collect and store information from and about you automatically when you use this Site, including information or data that does not personally identify an individual person and is not readily available for that purpose (“Non-Personal Information”). For example, ORBIS may collect information such as your type of browser,

operating system, search requests, website traffic information, the date and time you visited this Site, the amount of time you used this Site, the pages you visited on this Site, any device you are using to access this Site, and any hyperlinks you click on when using this Site.

D) Information We Do Not Intend to Collect.

- i. **Special Categories of Personal Data.** “**Special Data**” is any data that reveals your racial or ethnic origin, political views or opinions, religious, moral or philosophical beliefs, trade union membership, genetic data, biometric data, health, or your sex life and/or sexual orientation. The data ORBIS collects and processes does not qualify as Special Data. Unless specifically requested during the job application process for those employed in the United States, we do not intend to collect any Special Data from you. Please refrain from entering, posting, or sending us any Special Data.
- ii. **Information from Children.** This Site is not directed toward anyone under the age of eighteen (18) years old, or under the age of majority in your place of residence. If you are under this age, please stop using this Site.

4. HOW WE COLLECT INFORMATION FROM YOU.

- A) **When You Communicate with Us.** We collect Personal Information when you voluntarily provide it to us and communicate with us. For example, when you call, mail, or email us, or when you post on this Site.
- B) **When You Create an ORBIS Access Account.** We collect Personal Information when you register for and create an ORBIS Access account (“**Account**”). To create an Account, you must submit your first and last name, company name, address, phone number, email address, and an ORBIS employee that you are in contact with. You can monitor the status of certain product orders using your Account. We may change the information we request from time to time, but the information we request from you will be the same type of information as listed in this Section unless otherwise stated on this Site.
- C) **When You Request Information.** We collect Personal Information when you request information through this Site on the "Request Info" or “Request Quote” page. In these instances, we collect first and last name, company name, email address, phone number, address, and a message regarding your request. We may change the information we collect from time to time, but the information we request from you will be the same type of information as listed in this Section unless otherwise stated on this Site.
- D) **Applying for Jobs with ORBIS.** If you send us a resume or other application materials to apply to work for ORBIS, we will only use those materials to evaluate your qualifications to work for ORBIS or its affiliates, and to otherwise consider or respond to your inquiry.
- E) **Tradeshows.** We collect Personal Information if you provide it to us at a tradeshow, such as an address, email address, and phone number. We may use this information to send you communications about our goods and services. You can unsubscribe any time by following the instructions in [Section 13](#) or by contacting us as set forth in the "Contacting Us" section below.

- F) **Social Media.** We may collect and store any information that you post on our Social Media (defined below) accounts, such as your name, social media handle, and public posts or comments you make on social media networks.
- G) **When you Make a Purchase.** We may collect Personal Information from you when you directly purchase goods or services from ORBIS. The contract between ORBIS and its customers may address how we treat any information you provide us.
- H) **Automatically – Cookies and Other Tracking.**

What types of online tracking mechanisms do we use? We may use cookies, web beacons, pixel tags, and other tracking technologies (collectively, “**Cookies**”) on this Site.

What are cookies, web beacons, and pixel tags? A cookie is a small text file that this Site saves onto your computer or device when you use this Site that provides us certain information about your activities. Cookies allow this Site to remember your actions and preferences and recognize you or your browser, along with some information you provided. Web beacons and pixel tags are small graphics on a webpage or email that monitor your activity when viewing a webpage or email.

Why do we use Cookies? We use Cookies to:

- make our Site function properly;
- allow you to access your Account information (stored on our computers);
- provide us and our service providers with information that we will use to provide personalized experiences, such as to change the language on this Site;
- tailor our interactions with you;
- help with our marketing efforts;
- provide us with valuable data and statistics about the usage and effectiveness of this Site and to help us improve this Site;
- measure the effectiveness of our marketing campaigns and understand engagement with our emails (such as if messages have been opened, acted on, or forwarded); and
- help us improve our services.

What type of information do Cookies collect? The Cookies on this Site may collect information such as:

- IP addresses assigned to the computers and other devices you use;
- your internet service provider;
- device ID number;
- approximate geographic location;
- browser type;
- Site pages visited;
- websites you access before and after visiting this Site; and
- data related to how and when you use this Site (such as the pages most read, time spent, search terms, and other engagement data) or engage with our advertising or communications.

How long do Cookies last? A Cookie can either be a “session” Cookie or a “persistent” Cookie. Session Cookies exist only for so long as you are visiting the applicable site and are typically deleted when you exit your web browser. Persistent Cookies exist for a set period of time, for

example, up to several months or years. Each time you visit a site that has implemented a persistent Cookie, the persistent Cookie is renewed and that Cookie will remain active until its predetermined expiration date. You can manually delete persistent Cookies through your browser settings.

Third-Party Cookies. Cookies may either be “first-party” or “third-party” Cookies. A first-party Cookie allows your web browser to talk to the actual site that you are visiting (e.g., this Site). A third-party Cookie allows your web browser to talk to a third-party website, such as the source of an ad that appears on the website you are visiting or a third-party analytics provider.

How do you manage Cookies or Opt Out? Most browsers automatically accept cookies. You can disable this function by changing your browser settings, but disabling cookies may impact your use and enjoyment of this Site. Not all features or functions of this Site may work properly if you disable Cookies. You cannot disable all Cookies, such as Cookies that are essential to the functioning of this Site.

- I) **Analytics.** This Site uses Google Analytics, a web analysis service provided by Google Inc. (“**Google**”), to collect and analyze information about your use of this Site, which your web browser automatically sends to Google. This information includes the URLs of the websites that you visit and your IP address. Google may also set Cookies (which are third-party Cookies) or read preexisting Cookies. This information is stored on Google’s servers. Google uses this information to provide us with reports about Site traffic and your visits to this Site. We will use this data to improve this Site’s structure and content and improve our marketing capabilities. Google may use this data in accordance with its privacy policy, which is located at <http://www.google.com/policies/privacy>. For more information on how Google uses data collected through Google Analytics, please visit <http://www.google.com/policies/privacy/partners>. You may opt out of our use of Google Analytics by visiting the Google Analytics opt-out web site at <http://tools.google.com/dlpage/gaoptout> and installing the Google Analytics Opt-Out Browser Add-On. Please remember that you will need to opt out for each browser you use.

5. CALIFORNIA'S “DO NOT TRACK” SIGNAL REQUIREMENT. We do not currently honor “do not track” requests.

6. HOW WE USE YOUR PERSONAL INFORMATION. We use your Personal Information in compliance with applicable laws. We use your Personal Information as was stated (or obvious) at the point of collection. We also use your Personal Information in the following ways:

- A) To respond to your questions, comments, or complaints, including to respond to questions posed through the “Request Info” or the “Request a Quote” page;
- B) To create and manage your Account;
- C) To access, manage, and use our Social Media pages;
- D) To review and evaluate applicants for employment, including to follow up with references provided to us;
- E) To promote trade shows;
- F) To facilitate transactions;

- G) To send you promotions or other communications;
- H) To troubleshoot problems with this Site;
- I) To improve the content and functionality of this Site and the services we provide to our customers;
- J) To perform statistical analysis and other analyses of this Site;
- K) To provide visuals and promote our goods and other services sold on this Site;
- L) To notify you of new services, new features of this Site, changes to the [Terms of Use](#), this Privacy Policy, or other similar communications;
- M) To address and respond to DMCA (defined below) claims and counterclaims;
- N) To protect our legal rights or interests, or those of third parties, including to bring a legal action against you or anyone who may be causing harm to us, this Site, or to other users of this Site; and
- O) As requested by or consented to by you.

7. **WHO WE SHARE YOUR PERSONAL INFORMATION WITH.** We do not sell, rent, or loan your Personal Information to any third party. We limit the parties with whom we share your Personal Information. We may share your Personal Information with the following parties:

- A) **Employees and Affiliates.** Our employees and affiliates who have a need to know the information for our business purposes.
- B) **Third-Party Service Providers.** We may share your Personal Information with our third-party service providers and our representatives that provide certain services for ORBIS, with whom we have contracted. For example, we share your Personal Information with our third-party service providers that host and manage this Site or that provide services through this Site. We share your Personal Information with our third-party service providers to: (i) provide targeted advertising and other marketing; (ii) improve the content and functionality of this Site; (iii) perform data analysis and statistical analysis; (iv) help us with our marketing efforts; (v) help manage, administer, and fulfill sales; (vi) troubleshoot problems with this Site; and (vii) administer the job application process.
- C) **Government Officials / Law Enforcement.** We will cooperate with law enforcement and other governmental agencies, including by disclosing your Personal Information, if you are suspected of violating applicable laws. We may disclose your Personal Information to governmental officials, law enforcement, or other similar governmental personnel: (i) if we believe in good faith we are legally required to disclose that Personal Information; (ii) if we are advised to disclose your Personal Information by our legal counsel; or (iii) when necessary to identify, contact, or bring a legal action against someone who may cause or be causing harm to, or interfering with the legal rights of, ORBIS or any other party.
- D) **Professional Advisors.** We may share your Personal Information with our professional advisors, such as our attorneys, accountants, financial advisors, and business advisors, in their capacity as advisors to ORBIS.

- E) **Other Users.** By submitting a copyright infringement notice, counter-notice, or other similar notification through this Site or to ORBIS, you consent to having that communication forwarded to any person or entity to whom the notice or counter-notice relates to in order to facilitate a prompt resolution of the copyright infringement claim. Copyright infringement notices and/or counter-notices from you will be treated in accordance with our Digital Millennium Copyright Act (“DMCA”) Policy found at: <https://docs.orbiscorporation.com/dmcapolicy>. This Section is only applicable to you if you are located in the United States.
- F) **Change in Ownership.** In the event ORBIS is the subject of a change of control transaction such as a merger, acquisition, sale of all or substantially all of our assets or equity, in the event this Site changes ownership, in whole or in part, or in the event of a bankruptcy, receivership, or similar transaction, we may provide your Personal Information to the subsequent owner(s), including as part of the due diligence process.
- G) **Other.** We may share your Personal Information with third parties when explicitly requested by or consented to by you, or for the purposes for which you disclosed the Personal Information to us as indicated at the time and point of the disclosure (or as was obvious at the time and point of disclosure from the context of collection).

8. **USING AND SHARING NON-PERSONAL INFORMATION.** ORBIS may collect, use, share, transfer, and otherwise process Non-Personal Information received or created by ORBIS (or its third-party service providers or licensors) for any business purposes in its sole discretion, so long as such collection, use, disclosure, transfer, and/or processing is in compliance with applicable laws.
9. **SECURITY.** ORBIS uses technical and organizational measures to ensure a level of security appropriate to the risk for all Personal Information processed. While we cannot guarantee that loss, misuse, or alteration to data will not occur, this Site has commercially reasonable security measures in place to help protect against the loss, misuse, and alteration of the information under our control. In the event that a breach into our security systems occurs and there is a possibility that an unauthorized person acquires your Personal Information, ORBIS will notify you of the breach as required under applicable law.

YOU UNDERSTAND THAT NO DATA TRANSMISSION OVER THE INTERNET OR A MOBILE DEVICE CAN BE GUARANTEED TO BE 100% SECURE. WHILE WE STRIVE TO PROTECT YOUR PERSONAL INFORMATION, WE DO NOT GUARANTEE THE SECURITY OF ANY PERSONAL INFORMATION AND YOU PROVIDE SUCH PERSONAL INFORMATION AT YOUR OWN RISK.

10. **SOCIAL MEDIA.** ORBIS is active on social media, including Facebook, Twitter, Instagram, YouTube, and LinkedIn (“**Social Media**”). You have the opportunity to comment on those Social Media platforms regarding ORBIS and the programs, goods, and services we offer. Any content you post on a Social Media platform is public information and will be treated as non-confidential information. ORBIS reserves the right to post (or re-post) on this Site and its Social Media pages any comments or content that you post on our Social Media pages. **YOU AGREE TO HOLD ORBIS AND ITS AFFILIATES HARMLESS AND WITHOUT LIABILITY FOR THE RESULTS OF ANY AND ALL CONTENT YOU POST TO ORBIS’ SOCIAL MEDIA PAGES.**

The Social Media platforms may require us to implement cookies, plug-ins, and/or application protocol interfaces (APIs) provided by those Social Media platforms to facilitate those communications and features. Your use of Social Media platforms and the collection, use, and sharing of Personal

Information by such platforms is governed by the privacy policies and terms of the third parties that own and operate those sites and NOT by this Privacy Policy. We encourage you to review the privacy policies of those third-party Social Media platforms.

11. **THIRD-PARTY SITES.** This Site may link to, or be linked to, other websites not maintained by or related to ORBIS. ORBIS is not responsible for the privacy practices of any third parties or third-party websites, including those linked on this Site. To the extent that you disclose Personal Information to any third parties or through any third-party websites, the privacy policies and terms of those third parties, and not this Privacy Policy, apply to the use of your Personal Information. We are not responsible for any information that you provide to third-party websites.
12. **CALIFORNIA RESIDENTS.** Pursuant to California Civil Code Section 1798.83, if you are a California resident, you have the right to obtain: (a) a list of all third parties to whom we may have disclosed your Personal Information within the past year for direct marketing purposes; and (b) a description of the categories of Personal Information disclosed, by emailing info@orbiscorporation.com.
13. **COMMUNICATING WITH YOU.** ORBIS may use your Personal Information to send you email or direct mail information about ORBIS or the goods or services we offer. You may opt out of receiving certain email promotions from us by clicking the “unsubscribe” link in the email you received, or by contacting us at info@orbiscorporation.com. To opt out of direct mailing, you may contact us at info@orbiscorporation.com.
14. **CONSENT TO PROCESSING IN THE UNITED STATES.** By providing Personal Information to us, you understand and consent to the collection and processing of your Personal Information in the United States, regardless that certain governmental authorities may not consider the level of protection of Personal Information in the United States to be equivalent to that required by the European Union (“EU”) or other jurisdictions. Certain EU authorities have determined that the United States does not provide an “adequate” level of protection for the processing of Personal Information.
15. **GOVERNING LAW; VENUE.** Unless otherwise required by the applicable law of your country of residence, this Privacy Policy is governed by the laws of the State of Wisconsin, United States, without regard to conflict of laws principles. Venue is exclusively in Waukesha County, Wisconsin with respect to any dispute arising under this Privacy Policy.

16. **TERMS APPLICABLE TO PERSONS LOCATED IN THE EEA.** The purpose of this Section is to provide information and additional terms that apply regarding ORBIS’ processing of personal data of persons located in the EU and the European Economic Area (including the United Kingdom) (collectively, the “EEA”) in accordance with the EU General Data Protection Regulation 2016/679 (“GDPR”). **THIS SECTION ONLY APPLIES TO YOU IF YOU ARE LOCATED IN THE EEA.**

In the event of a conflict between this Section and the remainder of this Privacy Policy, this Section will control for those persons located in the EEA.

- A) **Definitions.** The terms “personal data” and “processing” have the same meanings set forth under GDPR. Those definitions are set forth below for your convenience.

- i. “**personal data**” means any information relating to an identified or identifiable natural person (“**data subject**”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.
- ii. “**processing**” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Furthermore, as used in this Section, the following definition applies:

- iii. “**Automated Decision**” means an automated decision made about an individual person, including profiling, often where meaningful logic is involved, that produces legal effects that significantly affects the involved individual.

B) **Processing of Personal Data.** Personal Information is considered personal data under the GDPR. Furthermore, if any Non-Personal Information also qualifies as personal data under the GDPR, then it will be considered and treated as *personal data* for those persons located in the EEA.

C) **Legal Basis for Processing.** When ORBIS processes your personal data, it has a legal basis for doing so as required under the GDPR. ORBIS will only process your personal data if: (i) it has received your express opt-in consent for such processing; (ii) the processing is necessary for performance of a contract; (iii) the processing is necessary for a legal obligation to which ORBIS is subject; (iv) the processing is necessary to protect the vital interests of the data subject; (v) the processing is necessary for a task carried out in the public interest; or (vi) ORBIS or a third party has a legitimate interest that is not overridden by the interests or fundamental rights and freedoms of the data subject.

We have set out in the table below the reasons why we process personal data, the associated legal basis for ORBIS’ processing of such personal data, and the type of personal data. If ORBIS is required to process any personal data for reasons (iii), (iv) or (v) above, those reasons may not be known to ORBIS today and therefore may not be listed below, but examples are listed in Sections 6 and 7 above.

ORBIS’ Purpose for Processing	Legal Basis for The Processing	Category of Personal Data (see details provided above for more information)
When you register and maintain an ORBIS Access Account: to register and manage your Account and allow you to track the status of your orders.	Consent	<i>Personal data</i> (contact information; business contact information)

When you request information or provide information through this Site, over the phone, through the mail, or through email: to address or respond to your requests, questions, or concerns; when you sign up to receive emails or promotions; customer and technical support, or other similar activities.	Consent (if collected online) Legitimate Interest (if you contact us through another method)	<i>Personal data</i> (contact information)
When you apply for employment: to consider applications for employment; to conduct employment-related due diligence, such as contacting references.	Contract / Legitimate Interest	<i>Personal data</i> (contact information; employment related information)
Purchases: to sell and fulfill any order you place directly with ORBIS, including to manage shipping, collections, returns, and order fulfillment.	Contract	<i>Personal data</i> (business contact information)
Trade Shows: to directly market to you.	Consent	<i>Personal Data</i> (contact information)
Site Administration: to administer our Site (for example, troubleshooting, system maintenance, respond to DMCA requests, and data analysis).	Legitimate Interest (to effectively run our Site and administer IT services)	<i>Personal Data</i> (contact information)
Analytics and Marketing: to analyze and improve this Site and features of this Site and content on this Site; to provide direct marketing to you about our goods, services, and this Site.	Legitimate Interest	<i>Personal Data</i> (contact information; Cookies)
Social Media: to engage with our customers, prospective customers, and the community about our goods, service, and brand, and if required, take actions to maintain the quality of the brand in the market.	Legitimate Interest	<i>Personal Data</i> (contact information; Cookies)

D) **Right to Withdraw Consent.** In the event you provide your consent for us to process your personal data, you may withdraw your consent at any time by emailing info@orbiscorporation.com to request such change at no additional cost.

E) **Marketing.** ORBIS does not process personal data for the purpose of marketing without first obtaining your express, opt-in consent or having a legitimate interest for doing so. **YOU HAVE THE RIGHT TO OBJECT TO THE PROCESSING OF PERSONAL DATA FOR**

MARKETING PURPOSES AT ANY TIME BY CONTACTING US AT info@orbiscorporation.com.

- F) **Data Collected Not from the Data Subject.** We sometimes collect personal data from third-party sources and not the data subject themselves. For example, we receive personal data about third parties when job applicants provide references. We only use employment reference information for the purpose of employment verification.
- G) **Your Rights and Choices.** The GDPR provides certain rights to individuals in relation to that individual's personal data. Accordingly, you may have the following rights under the GDPR, although some exceptions apply. We will comply with any requests made relating to the following rights if required by applicable law. We may require you to prove your identity before we modify, provide, delete, or transfer your personal data.
- i. **Right of Access** – You have the right to be informed of and require that we provide you a copy of the personal data we process about you.
 - ii. **Right to Rectification** – You have the right to request that we amend or update inaccurate or incomplete personal data.
 - iii. **Right to Erasure (Deletion)** – Under certain circumstances, you have the right to request deletion of your personal data.
 - iv. **Right to Restrict** – Under certain circumstances, you have the right to request that we temporarily or permanently stop processing all or some of your personal data.
 - v. **Right to Object** – Under certain circumstances, you have the right to object to ORBIS processing personal data, such as for direct marketing purposes or when Automated Decision making is used.
 - vi. **Right to Data Portability** – You have the right to request a copy of your personal data in electronic format and further request that we send such personal data to another party.
 - vii. **Communication Preferences and Opt-Outs** – You have the right to stop receiving communications from us at any time by contacting info@orbiscorporation.com, at no additional cost.
 - viii. **Right to Lodge a Complaint** – You have the right to lodge a complaint with the applicable supervisory authority. Although you are not legally required to do so, we ask that you first contact us so we can make reasonable efforts to address your complaint.

If you have any questions about your privacy, your rights and choices, or how to exercise them, please contact us with your request at info@orbiscorporation.com. We will respond to your request within a reasonable period of time.

- H) **Providing Personal Data Due to a Contractual Requirement.** You must provide personal data necessary to enter into certain agreements with ORBIS, such as in certain employment circumstances and in order to purchase products from ORBIS.

- I) **The Consequences of Not Providing Personal Data.** ORBIS will not be able to provide certain services to you without processing certain personal data such as processing job applications or selling products. Furthermore, if you turn off certain tracking devices or decline certain cookies on this Site, certain features of this Site may not work.
- J) **Data Retention.** ORBIS will only keep your personal data for so long as it has a business purpose for doing so.
- K) **Transfer to Third Parties and Countries.** Personal data that we collect or receive may be transferred to and/or processed by third parties that are located outside of the EEA, some of which EU authorities may not consider to have an adequate level of protection for personal data. ORBIS will only transfer EEA data subject's personal data to third parties located outside of the EEA when it has ensured appropriate safeguards for such personal data, such as through use of the standard contractual clauses (or its successor contract).

Furthermore, ORBIS' German and Belgium affiliates (ORBIS GmbH and ORBIS NV) transfer EEA personal data to certain of ORBIS' United States affiliates (ORBIS Corporation and Menasha Corporation). The United States is not considered as having an adequate level of protection for personal data by EU data protection authorities. However, ORBIS has ensured appropriate safeguards for those transfers of EEA personal data by the execution of the standard contractual clauses between the relevant parties.

You may request a copy (which may be provided as a summary) of any such appropriate safeguards or seek inquiries regarding such safeguards by contacting us info@orbiscorporation.com. We will respond to your request or inquiry within a reasonable period of time.

17. TERMS APPLICABLE TO PERSONS LOCATED IN MEXICO. This Section provides additional terms and information that apply only to residents of Mexico pursuant to the Federal Law on Protection of Personal Data in the Possession of Private Parties (Ley Federal de Protección de Datos Personales en Posesión de Particulares) (“LPPD”), and only to the extent that the LPPD applies to ORBIS. “**Personal Data**” has the meaning set forth in the LPPD.

A) **When We Share Your Personal Information with Third Parties.** We will only disclose your Personal Data to third parties without requiring your consent pursuant to Article 37 of the LPPD.

B) **How To Access, Rectify, Cancel, and Object to the Use of Your Personal Data.**

i. **Arco Rights** – You have the right to know the type of Personal Data collected, and the purposes and conditions for which it was collected and used (Access).

You have the right to request correction or clarification of your Personal Data, if the information is outdated, incomplete, or incorrect (Rectification).

You have the right to request that we delete your Personal Data if the Personal Data is not being used according to guidelines, duties, and obligations, as stated under the LPPD (Cancellation).

You have the right to oppose the use of your Personal Data for specific purposes permitted by the LPPD (Objection).

Collectively, your rights of Access, Rectification, Cancellation, and Objection are known as your “**ARCO Rights**.”

- ii. **Exercising Arco Right** – In order to exercise any of the ARCO Rights, you must submit the respective request through an email addressed to the address below. In accordance with Article 29 of the LPPD, the request must contain information requested on all required fields and marked as mandatory, including: complete name (including last name(s)), email address or postal address for notifications, a contact telephone number, and a clear and exact description of the Personal Data for which ARCO Rights are being exercised. The form should be accompanied by a copy of an official form of identification or be included in a legible electronic file (scanned). We will make reasonable efforts to reply to your notice within twenty (20) working days of receiving your request, and we will respond by email to the address the request came from.
- iii. **Revocation of Consent** – You may revoke your consent, which you may have granted us, for the managing of your Personal Data. However, we cannot comply with such request in all cases, or stop using the information immediately, and due to a legal obligation, we may continue managing your Personal Data. Likewise, we ask that you please consider that for certain purposes, revocation of consent would mean we are not able to continue providing you with requested services, or it might also imply an end to your relationship with us.

C) **Improper Use of Your Personal Data.** If you think that your right to protection of your Personal Data is improperly used in violation of the LPPD, you may reach out to Mexico's IFAI with an official complaint. For more information, please visit their website at www.ifai.org.mx.

18. TERMS APPLICABLE ONLY TO CANADIAN RESIDENTS. This Section provides additional terms and information that apply only to residents of Canada. “**Personal Information**” means information about an identified or identifiable individual and includes Non-Personal Information where such information can be linked to an individual either alone or in combination with other information (such as information contained in cookies).

- A) **Legal Disclosures and Lawful Requests.** We and our Canadian, US, and other foreign service providers and affiliates may disclose your Personal Information in response to a search warrant or other legally valid inquiry or order, or to another organization for the purposes of investigating a breach of an agreement or contravention of law or detecting, suppressing, or preventing fraud, or as otherwise may be required or permitted by applicable Canadian, US, or other law or legal process, which may include lawful access by US or foreign courts, law enforcement, or other government authorities. Your Personal Information may also be disclosed where necessary for the establishment, exercise, or defense of legal claims and to investigate or prevent actual or suspected loss or harm to persons or property.
- B) **Access.** Subject to limited exceptions under applicable law, you have the right to request access, updating, and corrections of inaccuracies in your Personal Information in our custody and control. You may exercise these rights by emailing or writing to us at the contact information set out below.

We may request certain Personal Information for the purpose of verifying the identity of the individual seeking access to his or her Personal Information records. We may, unless otherwise prohibited by applicable law, charge a reasonable fee for granting you access to your Personal Information.

C) **Your Choices.** You can opt out of receiving marketing communications from us by doing one of the following:

- If you received a marketing email, you could follow the opt-out or “unsubscribe” instructions provided in your email. Please note that you may continue to receive certain transactional and account-related communications from us.
- Contact us at the contact information noted below.

D) **Data Collected Not from the Data Subject.** We sometimes collect Personal Information from third-party sources. For example, we receive Personal Information about third parties when job applicants provide references. We only use employment reference information for the purpose of employment verification.

19. NOT APPLICABLE IN CHINA. This Privacy Policy does not apply to the processing of Personal Information of persons located in China.

20. CONTACTING US. If you have any questions or concerns regarding this Privacy Policy or the manner in which we or our service providers treat your Personal Information, please contact us as follows:

ORBIS Corporation
Attn: Marketing Communications
P.O. BOX 389
Oconomowoc, WI 53066-0389
800-890-7292
info@orbiscorporation.com