Our Commitment

We at SAGR Products Int'I respect your concerns about privacy and are committed to maintaining the privacy and security of your Personal Information. This Privacy Policy governs the manner in which SAGR Products Int'I ("SAGR" or "we") collects information from users ("User" or "you") of any of SAGR's websites (inclusive of <u>www.sagrproducts.com</u> the "Website"), or which we otherwise receive or collect from you in the course of our operations. This Privacy Policy describes the types of Personal Information. This Privacy Policy also describes the measures we take to safeguard your Personal Information. If you do not consent to the collection, use and disclosure of your Personal Information as described in this Privacy Policy, do not use the Website or submit any Personal Information to us through the Website.

Please contact us as indicated in the "**How to Contact SAGR**" section below if you have any questions or would like additional information.

Changes to This Privacy Policy

We may update this Privacy Policy at any time, so please check this Privacy Policy periodically for changes and updates. When we change this Privacy Policy, we will revise the updated date at the bottom of this Privacy Policy. We encourage Users to frequently check this page for any changes to stay informed about how we are helping to protect the Personal Information we collect. You acknowledge and agree that it is your responsibility to review this Privacy Policy periodically and become aware of modifications. Your continued use of the Website after posting of any such changes will constitute your consent to and acceptance of the revised Privacy Policy.

Categories of Personal Information that SAGR Collects and Processes

SAGR collects personally identifiable information ("Personal Information") through certain areas of the Website. SAGR may collect and process the following categories of Personal Information:

| Professional | company details, address, email address, phone and fax number, postal and billing address, business contact, job role, education, SAGR account and order number, freight information, and freight recipient information and other data that enables SAGR to maintain a business relationship with you |
|---------------|--|
| Transactional | payment information |
| Identifying | first and last name, SAGR username and password, government identification information as required in certain circumstances |
| Tracking | IP addresses, browser fingerprint information, device fingerprint (advertising) |

Where permissible by law, SAGR differentiates Personal Information from personal data that may be about an individual but may not be reasonably associated with a unique individual. SAGR may collect and aggregate such personal data, including your ZIP code, age, gender, preferences, interests and favorites, as well as non-personalized Website usage, measurement and other analytical data and information automatically sent by your web browser about your computer hardware and software (e.g. access time and referring website address). SAGR reserves all rights to use unidentifiable, anonymized, and non-Personal Information and data for any and all purposes in its discretion, where allowed by law or with your consent. Please check your browser if you want to learn what information your browser sends or how to change your settings.

How we Collect Personal Information

We may collect Personal Information from Users in various ways, including, but not limited to when Users:

- visit our Website
- register, submit or post information on our Website
- request a service
- respond to a survey, fill out a form
- participate in any of SAGR's events, promotions, activities, services, or other offers we make available on our Website

Please do not submit any Personal Information of another person unless you are authorized to do so.

On certain areas of the Website, only persons who provide us the required Personal Information will be able to purchase, license and/or apply for products, programs and services and/or otherwise participate in the Website's activities or offerings.

Users may always refuse to supply Personal Information to us, though it may prevent you from participating in and accessing certain Website related events, promotions, activities, services, or other offers. For example, providing Personal Information in order to register on our Website gives Users access to SAGR's enhanced tracing, customizable reports, document review, interactive bill of lading, customized rate estimates for the User's specific pricing program, and much more.

Security

SAGR has implemented security measures designed to protect the Personal Information you share with us, including physical, electronic and procedural measures. Among other things, we offer HTTPS secure access to most areas on our Services; the transmission of sensitive payment information (such as a credit card number) through our designated purchase forms is protected by an industry standard SSL/TLS encrypted connection; and we regularly maintain a PCI DSS (Payment Card Industry Data Security Standards) certification. We also regularly monitor our systems for possible vulnerabilities and attacks, and regularly seek new ways and Third Party Services for further enhancing the security of our Services and protection of our Visitors' and Users' privacy.

Regardless of the measures and efforts taken by SAGR, we cannot and do not guarantee the absolute protection and security of your Personal Information, your Users-of-Users' Personal Information or any other information you upload, publish or otherwise share with SAGR or anyone else. We encourage you to set strong passwords for your User Account and User Website, and avoid providing us or anyone with any sensitive Personal Information of which you believe its disclosure could cause you substantial or irreparable harm.

Furthermore, because certain areas on our Services are less secure than others (for example, if you set your Support forum ticket to be "Public" instead of "Private", or if you browse to a non-SSL page), and since e-mail and instant messaging are not recognized as secure forms of communications, we request

and encourage you not to share any Personal Information on any of these areas or via any of these methods.

If you have any questions regarding the security of our Services, you are welcome to contact us here.

Purposes for Collecting and Processing your Personal Data

SAGR may process your Personal Information for the following **purposes**:

- To operate and administer this Website, including personalizing its features based on your preferences
- To provide you with our services and products according to agreed terms and as per your request, thus enabling a good customer experience
- To carry out specific transactions, bookings, deliveries, payment processing, and tracking functions, and for maintaining our contractual and business relationship with our customers and/or vendors, including for maintaining a routine administrative flow and a routine contractual relationship with our customers and vendors and their representatives
- To operate, evaluate and improve our business (including developing new products and services; managing our communications; determining the effectiveness of our sales, marketing and advertising; analyzing and enhancing our products, services and the Website; and performing accounting, auditing, billing, reconciliation and collection activities)
- To respond to and support our Users, and communicate with you regarding requests, questions, and comments
- To communicate with you through tailored newsletters, emails, notifications, and other business communications in order to help you stay up to date with our service and product offerings and those of our affiliates, and to notify you of special events, contests, sweepstakes, and other promotions, unless you object to or opt-out of such communications
- To communicate with you through all forms of online media, including via social media platforms
- To contact you in order to conduct opinion research regarding current and/or potential new services that SAGR may offer
- To enable you to establish and manage a User account on our platform
- To monitor your use of our systems and Website to enable us to personalize your experience on our Website and to determine the popularity of various service offerings
- To improve the security and functioning of our Website and systems, including by performing data analyses (market and consumer research, trend analysis, financial analysis)
- To manage anti-fraud, anti-corruption, anti-money laundering, anti-identity theft, and anti-bribery efforts, and to comply with all other applicable legal requirements and our policies
- For any purposes described at the point of collection of Personal Information, or for purposes for which you have provided prior approval

Web Browser Cookies and Internet Tags

Our Website may use electronic cookies ("cookies") to help personalize your online experience. Cookies are a text file that websites send to a visitor's computer or other Internet-connected device to uniquely identify the visitor's browser or to store information or settings in the browser.

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the web server that you have returned to a specific page. SAGR may also link certain data elements with other information we have obtained about you to let us know, for example, whether you have opened an account with us or contacted us before. We also may use third-party website analytics tools that collect information about User traffic at the Website.

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In addition, SAGR uses information collected online through cookies, internet tags and other automated means for purposes such as diagnosing technical and service problems, administering the Website, identifying Users of the Website, and gathering demographic information about our Users. We use click stream data to determine how much time Users spend on web pages of the Website, how users navigate through the Website, and how we may tailor the Website to better meet the needs of our Users. We also may use the information we obtain about Users in other ways for which we provide specific notice at the time of collection.

Your browser may tell you how to be notified when you receive certain types of cookies and how to restrict them. We believe that cookies and internet tags provide a safe and secure way to improve the usability of the Website.

SAGR uses the following categories of cookies:

- Strictly Necessary Cookies These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the site will not then work without enabling the cookies. These cookies do not store any personally identifiable information.
- **Performance Cookies** These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most popular and how visitors move around the site. All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies we will not know when you have visited our site, and will not be able to monitor its performance.
- **Functional Cookies** These cookies enable the website to provide enhanced functionality and personalization. They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies then some or all of these services may not function properly.
- **Targeting Cookies** These cookies may be set through our site by our third-party vendors. They may be used by those companies to build a profile of your interests and show you relevant advertisements on other sites. They do not store directly Personal Information, but are based on uniquely identifying your browser and internet device. If you do not allow these cookies, you will experience less targeted advertising.
- Social Media Cookies Social Media Cookies make social sharing easier for you provide you with tools to connect with the Site, and help us better understand both the audience for the Site and the effectiveness of our social media outreach efforts. These are third-party cookies. Your choices with respect to such cookies are determined by the social media platforms on which you have accounts.

To manage your cookies or for more information on the cookies we use, please visit our Cookie Center. You can customize your cookie settings here: Customize Cookies

We may also from time to time use site analytics technologies, such as Google Tag Manager, Google Analytics, and Double Click, which use cookies and other tracking technologies. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.

Public forums and user content

Our Services offer publicly accessible blogs, communities and support forums. Please be aware that any

Personal Information you provide in any such areas may be read, collected, and used by others who

access them. To request removal of your Personal Information from our blogs, communities or forums,

feel free to contact us here. In some cases, we may not be able to remove your Personal Information

from such areas. For example, if you use a third party application to post a comment (e.g., the Facebook

social plugin application) while logged in to your related profile with such third party, you must login into

such application or contact its provider if you want to remove the Personal Information you posted on that platform.

In any event, we advise against posting any Personal Information (via any means) you don't wish to publicize.

If you upload any user content to your User Account or post it on your User Website and provide it in any other way as part of the use of any Service, you do so at your own risk.

We have put adequate security measures in place to protect your Personal Information. However, we cannot control the actions of other Users or members of the public who may access your User Content, and are not responsible for the circumvention of any privacy settings or security measures you or we may have placed on your User Website (including, for instance, password-protected areas on your User Website). You understand and acknowledge that, even after its removal by you or us, copies of User Content may remain viewable in cached and archived pages or if any third parties (including any of your Users-of-Users) have copied or stored such User Content. To clarify, *we advise against uploading or posting any information you do not wish to be public*.

Sharing User's Personal Information

We also may disclose Personal Information about a User in the following circumstances:

- if we are required to do so by law, regulation or legal process (such as a court order or subpoena)
- in response to requests by government agencies, such as law enforcement authorities
- in order to enforce this Privacy Policy, or our Terms and Conditions, including for billing and collection purposes
- with your prior consent, and as required to perform services requested by you
- in accordance with this Privacy Policy, including the section entitled "Web Browser Cookies and Internet Tags"
- when we believe disclosure is necessary or appropriate to prevent physical harm, fraud, or financial loss or in connection with an investigation of suspected or actual illegal activity
- in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganization, dissolution or liquidation)
 SAGR shares Personal Information with the following categories of vendors to support our business

functions:

- Third party services providers and partners who provide data processing services to us
- Law enforcement, government agency, regulator, court, or other public authority where we believe disclosure is necessary either (a) as a matter of applicable law or regulation, (b) to exercise, establish, or defend our legal rights, or (iii) to prevent personal harm or financial loss
- A potential buyer (and its agents and advisors) in connection with any proposed purchase, merger, or acquisition of any part of our business, provided that we inform the buyer that it must use your Personal Information only for the purposes disclosed in this Privacy Policy
- A third party that you have consented to disclosure of your Personal Information To perform certain services and to support our business functions, we share information with certain third parties, including your name and address, the destination name and address, and the type of shipment. Our third party vendors are bound by confidentiality obligations, contractually required to have reasonable

technical and organizational controls in place to protect your Personal Information, and are authorized to use your Personal Information only as needed to perform services on SAGR behalf or to comply with legal requirements.

How SAGR Protects User's Personal Information

We maintain administrative, technical and physical safeguards designed to protect the Personal Information against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. In addition, we also implement appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your Personal Information, username, password, transaction information and data stored on the Website. If SAGR collects account information for payment or credit, SAGR will use the information only to complete the task for which the account information was offered. However, no information transmitted over the Internet can be guaranteed to be completely secure. Accordingly, we cannot ensure or warrant the security of any information transmitted to us via the Internet, and we accept no liability for any unintentional disclosure.

The Parties seek to implement a data processing agreement that complies with the requirements of the current legal framework in relation to data processing and with the Regulation EU (European Union) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation). "Data Protection Laws" means EU Data Protection Laws and,

to the extent applicable, the data protection or privacy laws of any other country. SAGR does not sell personal/private information.

The safety and security of your information also depends on our Users. Where we have given a User (or where a User has chosen) a password for access to certain parts of our Website, the User is responsible for keeping this password confidential. We encourage Users not share their password.

Third Party Links

The Website may contain links to websites operated by parties other than SAGR. Such links are provided for your reference and convenience only. We do not control such websites and are not responsible for their contents or the privacy policies or other practices of such websites. Our inclusion of links to such websites does not imply any endorsement of the material on such websites or any association with their operators. Further, it is up to the User to take precautions to ensure that whatever links the User selects or software the User downloads (whether from this Website or other websites) is free of such items as viruses, worms, trojan horses, defects and other items of a destructive nature. These websites and services may have their own privacy policies, which the User will be subject to upon linking to the third party's website. SAGR strongly recommends that each User review the third party's terms and policies.

Third-party websites

Our Services may contain links to other websites or services. We are not responsible for such websites' or services' privacy practices. We encourage you to be aware when you leave our Services and to read the privacy statements of each and every website and service you visit before providing your Personal Information. This Privacy Policy does not apply to such linked third party websites and services.

Compliance with Children's Online Privacy Protection Act

Protecting the privacy of the very young is especially important. For that reason, the Website is for Users over the age of 18. We never collect or maintain information at the Website from those we actually know are under the age of 18, and no part of the Website is structured to attract anyone under 18. If we are notified that we are in possession of Personal Information of an individual under the age of 18, we will take all reasonable steps to delete such information.

User's Choice to Opt-Out, Amend or Access Personal Information

You may choose not to receive marketing email communications from us by clicking on the "unsubscribe" link in our marketing emails. You also may ask us not to send you other marketing communications by contacting us as specified in the **"How to Contact SAGR**" section below, and we will honor your request.

Subject to applicable law, you may obtain a copy of Personal Information we maintain about you or you may update or correct inaccuracies in that information through your SAGR account at <u>www.sagrproducts.com</u>. To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to the information. In addition, if you believe that Personal Information we maintain about you is inaccurate, subject to applicable law, you may have the right to request that we correct or amend the information by contacting us as indicated below.

Additional Information for California residents

If you are a California resident using the Services, the California Consumer Privacy Act ("CCPA") grants

you the right to request access to and deletion of the Personal Information SAGR collects about you, as

well as to request that we disclose how we collect, use, and share your Personal Information.

California residents also have a right to opt-out of the sale of their Personal Information by a business and

a right not to be discriminated against for exercising any of their rights under the CCPA.

No sale of Personal Information. SAGR does NOT sell (as such term is defined in the CCPA) your

Personal Information or your customers' (Users-of-Users) Personal Information to third parties, and

SAGR has not sold Personal Information in the twelve months prior to the effective date of this Privacy Policy.

No Discrimination. SAGR does not discriminate against any User for exercising their rights under the CCPA.

California consumers can exercise their CCPA rights directly or through an authorized agent by signing in to their registered SAGR account at sagrproducts.com and following the instructions outlined below. Please note: in order to protect Users' accounts and Personal Information and safeguard Users' privacy rights, we verify Users' deletion and access requests, and to that extent, we may ask you for additional information or documentation (depending on the case), such as account related information, and, in some cases, billing information used to purchase paid Services, and a copy of documents that can assist with verifying your identity. Such identification documentation (if requested) will be used only for verification purposes and we will delete it after your request is processed.

The following instructions apply to Personal Information we may collect from California residents on or through our Services.

Right to Know: If you want to exercise your right to know or receive a copy or access the Personal Information that you have stored with us, please submit a request to access your Personal Information by submitting a request by email to <u>info@sagrproducts.com</u>, or by mailing your request SAGR Products Int'l 1785 Biglerville Rd Gettysburg PA, 17325

Right to Deletion: If you want to exercise your right to request deletion of any of your Personal Information that you have stored with us, you can also choose to submit a request to delete all your Personal Information (including information accessible via your User account and any other Personal Information we hold about you) by submitting a request by email to <u>info@sagrproducts.com</u>, or by mailing your request to SAGR Products Int'l 1785 Biglerville Rd Gettysburg PA, 17325

Once we receive and verify your consumer request, we will delete your personal information from our records unless an exception applies. We will make reasonable efforts to honor your request promptly and consistent with requirements under applicable law.

Please note that permanently deleting your SAGR profile erases all of your Personal Information from SAGR's databases. After completing this process, you may no longer be able to use any of your SAGR Services, your profile, and all its data will be removed permanently, and SAGR will not be able to restore your account or retrieve your data in the future. Additionally, if you contact our support channels in the future, order history associated with said profile.

If you cannot access your SAGR profile or if you wish to exercise your CCPA rights through an authorized agent operating on your behalf, you, or your authorized agent (as applicable) may send a request to <u>info@sagrproducts.com</u> or reach out by calling 1-800-223-4385, and speaking with a customer care expert. To process your request, in order to protect Users' accounts and Personal Information, we may ask you or your authorized agent for the verifying information detailed above, which may vary according to the circumstances of your request. Authorized agents will also need to provide SAGR with a copy of the consumer's signed authorization designating them as their agent.

Retention and Deletion

We will retain your Personal Information for as long as necessary to provide services to you, based on the nature of the information provided to us and the nature of services or the purpose for which the information was provided to us. Notwithstanding the other provisions of this section, we may retain your Personal Information where such retention is necessary for compliance with a legal obligation to which we are subject.

Disclosure is required by law;

How to Contact SAGR

If you have any questions or comments about this Privacy Policy, please contact us by telephone at 1-800-223-4385 or by email request to <u>info@sagrproducts.com</u>.