

## CCI Systems, Inc. Privacy Policy

This website privacy policy ("Privacy Policy") describes the practices of CCI Systems, Inc. regarding Personal Information collected via its website at [www.ccisystems.com](http://www.ccisystems.com) (the "Website"). This Privacy Policy applies only to Personal Information that we gather or collect via the Website. It does not apply to any information collected offline or otherwise outside of the Website.

### 1. What Information Does the Website Collect?

When you visit our Website, we may collect two types of information about you: (1) information that can be used to identify you ("Personal Information"), and (2) information related to your activities on the Website that we automatically collect as you interact with the Website ("Website Usage Information").

**(a) Personal Information You Voluntarily Provide.** Generally, you can visit the Website without telling us who you are and without giving us any Personal Information. The only way that we collect Personal Information at the Website is if you voluntarily fill out a form on the Website, register, subscribe to a newsletter, send us a message, or if you use another feature on the Website. We will collect whatever Personal Information you voluntarily provide (e.g., name, phone number, postal address, e-mail address, credit card number, cardholder name, expiration date). If you fill out an online form, we will collect whatever information you enter into the form and whatever data, files or materials you upload. Likewise, if you send us a message via the website (e.g., by entering it on a "Contact Us" page), you will be sending us your name, e-mail address, and any other information, including Personal Information, you choose to include in that communication. Please note that information submitted to the Website via a "Contact Us" form or similar function may not receive a response. You are under no obligation to provide

Personal Information, but if you elect not to provide it, you may be unable to use certain features of the Website or to communicate with us via the Website.

**(b) Information We Automatically Collect When You Visit And Use The Website.** When you visit the Website, we and our service providers may use a variety of technologies that automatically or passively collect or store certain Website Usage Information related to your activities on the Website. Website Usage Information may include your IP address or other unique identifier; your device functionality (e.g., browser, operating system, hardware, mobile network information); the URL that referred you to our Website; the areas within the Website that you visit and your activities there; your device location and characteristics and certain other device data, including the time of day and other information. We and our service providers may use a variety of technologies to collect or store Website Usage Information. These technologies may set, change, alter or modify settings or configurations on your device. These technologies may include, without limitation, cookies (a small data file placed on your computer when you visit the Website), web beacons (small graphic images or other web programming code that may be included in our web pages and e-mail messages), embedded scripts (code that is designed to collect information about your interactions with the Website, such as which links you click on), ETags, or similar and technologies. Third party service providers may use such technologies with our Website and may collect information about you, including Personal Information, without notice to you. By using the Website, you consent to potentially encountering third party tracking technologies when using our Website and accept that our statements in this Privacy Policy do not apply to the tracking technologies or practices of such third parties. We are not responsible for any such third party technologies or activities arising out of them. We are not responsible for the effectiveness of or compliance with any third party's opt-out options. Website Usage Information typically is anonymous information not associated with you or your identity. However, if Website Usage Information is combined with your

Personal Information in a manner that it is directly associated with your identity, it will be treated as Personal Information under this Privacy Policy.

**(c) Children.** The Website does not offer products or services to children and we do not knowingly collect any Personal Information from children younger than the age of thirteen (13). We will delete any Personal Information collected that we later determine to be from a person younger than the age of thirteen (13).

## **2. How do we use the Information Collected?**

We may use your Personal Information or Website Usage Information for various purposes, but it is primarily used to communicate with you and to transact business with you. For example, we use such information to: (1) respond to your inquiries and personalize your experience on the Website (your information helps us to better respond to your individual needs); (2) improve our Website (we continually strive to improve our Website offerings based on the information and feedback we receive from you) or our products and services; (3) provide you with information about products, services, and special offers and other information you request; (4) solicit information from you, manage your account and process payment transactions; (5) for internal business purposes; (6) for recruitment purposes and processing of employment applications, such as when the information is provided via an online employment application; (7) administer a contest, promotion, survey or other Website feature. In addition, Website Usage Information we collect may be used for a number of purposes, such as system administration, to help us understand the demographics of visitors to the Website, to enhance the performance and usefulness of the Website, and to audit use of the Website.

**3. Sharing of Personal Information With Third Parties.** We may share Personal Information with third parties under various circumstances. These include, for example:

**When You Request Information From or Provide Information to Third Parties.** You may be presented with an option on the Website to receive certain information or marketing offers directly from third parties or to have us send certain information to third parties or give them access to it. In these instances, your Personal Information and other information may be disclosed to third parties and all the information you disclose will be subject to the privacy policies and practices of such third parties. In addition, third parties may store, collect or otherwise have access to your information when you interact with their tracking technologies, content, tools, apps, or ads on the Website or link to them from our posting or content sharing tools. We are not responsible for the privacy policies and practices of such third parties and therefore you should review their privacy policies prior to requesting information from or otherwise interacting with them.

**Third Parties Providing Services on Our Behalf.** We may share Personal Information with third parties who perform services on our behalf. This includes, without limitation, third parties that: host the Website; operate certain functions or features of the Website; archive data; send communications; analyze data; and provide other services or functions on our behalf, including credit card processing, business analytics, customer service, marketing, distribution of surveys or contests, employment or hiring-related activities, data security functions, and fraud prevention.

**Affiliates, Business Transfers and Corporate Changes.**

We reserve the right to share Personal Information with our affiliates and in connection with a corporate divestiture, merger, consolidation, or restructuring, the

sale of substantially all of our ownership interests and/or assets, or other corporate change, including, without limitation, during the course of any due diligence process or in the event of bankruptcy, insolvency or dissolution.

**Administrative and Legal Reasons.** We may also disclose and transfer Personal Information to third parties: (i) in the event we are required to do so to satisfy an applicable law or regulation, to respond to a court order, subpoena, discovery request, or other legal process, or if in our good faith opinion such disclosure is required by law; (ii) at the request of governmental authorities conducting an audit, investigation or other inquiry; (iii) to verify or enforce compliance with other agreements or policies governing the Website, or applicable laws, rules, and regulations; or (iv) whenever we believe disclosure is necessary to limit our legal liability or to protect or enforce the rights, interests, or safety of our company, customers or the Website, its users or other third parties; and in connection with our Terms of Use and other agreements. We also reserve the right to investigate, prevent, or take action regarding illegal or suspected illegal activities and to report to law enforcement agencies any activities that we, in good faith, believe to be unlawful.

**Sweepstakes, Contests and Promotions.** We may offer sweepstakes, contests and promotions (any, a "Promotion") through the Website that may require registration. By participating in a Promotion, you are agreeing to official rules that govern it, which may contain specific requirements of you, such as, allowing the Promotion sponsor to use your name, voice and likeness in advertising or marketing associated with the Promotion. If you choose to enter a Promotion, Personal Information may be disclosed to third parties or the public in connection with the administration of the Promotion, including in connection with winner selection, prize fulfillment and as required by law or permitted by the official rules, such as on a winners list.

**Recruitment/EEOC/Affirmative Action Reporting.** We may collect information about your education, employment history, demographics or other information as part of the recruitment process, some of which may be sensitive data. When you provide us with Personal Information or other information as part of an online employment application, we may use that information to allow us to make an informed decision about whether to proceed with your application and you expressly consent to our use of this information for the recruitment process. In addition, certain employment application self-identifying information (e.g., race and gender) may be shared with the government and other third parties.

**Sharing of Non-Personal Information.** We may also share non-personally identifiable information, such as Website Usage Information, aggregated user statistics, and anonymous information derived from Personal Information (e.g., de-identified user information), with third parties for any purpose.

In addition, we may share information we have collected about you, including Personal Information, as disclosed at the time you provide the information or as otherwise described in this Privacy Policy.

#### **4. User Generated Content.**

The Website may permit you to submit ideas, photographs, data, music, video, audio recordings, user profiles, graphics, questions, comments, suggestions or other content, including Personal Information (collectively, "User Content"), such as on blogs, message boards and forms. We or others may store, display, reproduce, publish, distribute or otherwise use User Content online or offline in any media or format currently existing or hereafter developed and may or may not attribute it to you. Others may have access to this User Content and may have the ability to share it with third parties. Please think carefully before deciding what information you share, including Personal Information, as User Content. Please note that we do not

control who will have access to the information that you choose to submit and we cannot ensure that parties who have access to it will respect your privacy or keep it secure. We are not responsible for the accuracy, use or misuse of any User Content that is received from third parties through the Website.

## **5. Information You Provide About a Third Party.**

You may send someone else a communication from the Website, such as sending an invitation or link to a friend. If so, the information you provide is used to facilitate the communication and is not used by us for any other marketing purpose unless we obtain consent from that person or we explicitly state otherwise. Please be aware that when you use any send- to-a-friend functionality on our Website, your e-mail address, mobile number, name or user name and message may be included in the communication sent to your addressee(s).

## **6. Third Party Content and Links on the Website.**

The Website may contain content that is supplied by third parties and those third parties may collect Usage Information when pages from the Websites are served to you. In addition, when you are on the Website you may be directed to other sites operated and controlled by third parties that we do not control. We are not responsible for the data collection and privacy practices used by any of these third parties or their sites and they may be tracking you across multiple sites and sharing the results with us and/or others. We encourage you to note when you leave our Website and to review the third party privacy policies of all third party locations and exercise caution in connection with them.

## **7. Security.**

We incorporate commercially reasonable safeguards to help protect and secure your Personal Information. However, no data transmission over the Internet,

mobile networks, wireless transmission, or electronic storage of information can be guaranteed to be completely secure. Please consider this prior to submitting Personal Information to us via the Website.

## **8. Consent to Transfer Information to the United States.**

The Website is operated in the United States. By providing us with any information or materials via the Website, you consent to the transfer and processing of your information and materials in the United States.

## **9. Changes to the Privacy Policy.**

We reserve the right to change this Privacy Policy at any time without notice to you. Any changes will be effective immediately upon the posting of the revised Privacy Policy. However, we will not use previously collected Personal Information in a manner materially different than represented at the time it was collected without your consent.

## **10. Severability.**

To the extent any provision of this Privacy Policy is found by a competent tribunal to be invalid or unenforceable, such provision shall be severed to the extent necessary for the remainder to be valid and enforceable.

## **11. Contact Us; Questions.**

If you have any questions about this Website you may contact us via e-mail at [info@ccisystems.com](mailto:info@ccisystems.com), via phone at [+1 \(800\) 338-9299](tel:+18003389299), or via mail at:

CCI Systems, Inc.

Attn: Website Administrator CCI Systems

105 Kent Street



Iron Mountain, MI 49801

If you have any questions about Privacy you may contact us via e-mail at [privacy@ccisystems.com](mailto:privacy@ccisystems.com), via phone at [+1 \(906\) 771-2500](tel:+1(906)771-2500), or via mail at:

CCI Systems, Inc.

Attn: Privacy CCI Systems

105 Kent Street

Iron Mountain, MI 49801

**12. Effective Date.** This Privacy Policy is effective as of September 1, 2015.