

## PRIVACY POLICY

McLanahan Corporation (“**we**” or “**us**”) values our relationship with you and takes your privacy seriously. The purpose of this Privacy Policy is to identify how we may process, collect, store, share and use (collectively, “**use**”) the data that we collect from you in connection with your purchase of our products, requests for information or a quote, or use of our website, <https://www.mclanahan.com/> (collectively, our “**Services**”). This Privacy Policy also identifies your rights with respect to your personal information, all as described in more detail below.

We may update or modify this Privacy Policy at any time, by posting the amended version including the effective date of the updated version. We will announce any material changes to this Privacy Policy by posting the amended version on our website and providing a notification to you of the changes. By accessing and/or using the Services, you accept and agree to the terms of this Privacy Policy and the use of your data and personal information as described in this Privacy Policy. If you do not agree to be bound by this Privacy Policy or any subsequent modifications, you should not access or use the Services or disclose any personal information through any of the Services.

This Privacy Policy was last updated September 24, 2018.

Your privacy and the security of your personal information is, and will always be, important to us. We want to transparently explain how and why we gather, store, share, and use your personal information, as well as outline the controls and choices you have around when and how you choose to share personal information.

This Privacy Policy contains the following information, which you can access by scrolling down:

- 1. How to contact us.**
- 2. The information we collect about you.**
- 3. How we may use your information.**
- 4. Who we may share your information with.**
- 5. Your rights and options regarding your personal information.**
- 6. How we safeguard your personal information.**
- 7. How long we store your personal information.**
- 8. Links.**
- 9. Children.**
- 10. Special notice to non-U.S. users regarding data transfers.**
- 11. Governing law and jurisdiction.**

## **1. How to contact us.**

### **How to contact us and update your communication preferences and/or information:**

You can update your communication preferences and information by contacting us at the e-mail or postal address below.

Additionally, if you have any questions or concerns about our use of your personal information, please do not hesitate to contact us through any of the methods listed below.

#### **Mail:**

McLanahan Corporation  
Attn: Marketing Department  
200 Wall Street  
Hollidaysburg, PA 16648

**Phone:** +1 (814) 695 9807

**Email:** [marketing@mclanahan.com](mailto:marketing@mclanahan.com)

## **2. The information we collect about you.**

### **Information we collect.**

We obtain information about you and any devices (including mobile devices) you use and your use of our Services when you: use our Services, download product information, signup to receive communications or a quote from us, provide us information on a web form, engage or connect with us through our social media pages, or when you otherwise correspond with us. The information we collect can include personal information (as described below) or non-personal information, which is information that does not identify or relate to an individual.

Personal information is information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, 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. We collect information through any correspondence that you provide to us whether through email, mail, phone calls, or through our Services. Information that you provide might include, but is not limited to, the following: (a) first and last names; (b) demographic information; (c) mailing address; (d) email address; (e) phone number; (f) credit card number; (g) job title; (h) company name; and (i) other information that personally identifies you.

We do not consider personal information to include information that can no longer be used to identify a specific natural person, whether in combination with other information or otherwise.

## When and how do we collect your information?

We collect information from you both when you provide it voluntarily and also automatically when you use our Services. Most of the personal information we receive relates to your use and participation in the Services.

We also may collect personal information about you from third parties in connection with our Services, including from the following sources:

- E-commerce service providers
- Email, chat and other communications service providers
- Marketing service providers
- Customer service providers
- Data analytics service providers
- Advertising providers
- Social media platforms

In some instances, we automatically collect certain types of information when you use our Services or correspond with us. Automated technologies may include the use of web server logs to collect IP addresses, “cookies” and web beacons. For more information on our use of cookies, please review our Cookie Policy located at <https://www.mclanahan.com/legal-notice>.

## What information do we collect from you?

<b><i>Information collected when you request a quote or request to join McLanahan’s dealer network</i></b>	
<b>Categories of Information</b>	<b>Description of category</b>
<b>Quote Information</b>	This is the personal information that is provided by you or collected by us to enable you to request a quote of our Services. This includes your name, email address, and any personal information that you choose to enter into the blank message box.
<b>Dealer Information</b>	This is the personal information that is provided by you or collected by us to enable you to request to become a dealer that offers local service and support for our line of McLanahan Mobile Solutions equipment. This includes your name, company name, email address, phone number, postal code, and country.

<b><i>Information collected when you enter your information to access a product’s available downloads</i></b>	
<b>Categories of Information</b>	<b>Description of category</b>

<b>Product Registration Information</b>	This is the personal information that is provided by you or collected by us to enable you to access a product's available downloads. This includes your name, email address, and phone number. You may also opt-in to receive further information from us through this registration.
<b><i>Information collected when you subscribe to marketing content and/or subscribe or comment on our blog on our website</i></b>	
<b>Categories of Information</b>	<b>Description of category</b>
<b>Blog Registration Information</b>	This is the personal information that is provided by you or collected by us to enable you to sign up to receive marketing and promotional content or our blog periodically via email. This includes your name and email address.
<b>Blog Comments</b>	This is the information that is provided by you and collected by us when you choose to comment on a blog post. We do not require you to provide your personal information to comment, so comments would be non-personal information unless you choose to include personal information.

<b><i>Information collected through use of our Services</i></b>	
<b>Categories of Information</b>	<b>Description of category</b>
<b>Services Usage Information</b>	<p>This can be personal information and non-personal information that is collected about you when you are using our Services, and this may include:</p> <ul style="list-style-type: none"> <li>○ Information about your interactions with our Services, which includes the date and time of any information you enter into our Services, and your interactions with other users of our Services.</li> <li>○ User content you post to our Services including messages you send and/or receive through our Services and your interactions with our customer service team.</li> <li>○ Technical data which may include URL information, cookie data, web beacons and other tracking technology information, your IP address, the types of devices you are using to access or connect to our Services, unique device IDs, device attributes, network connection type (e.g., WiFi, 3G, LTE, Bluetooth) and provider, network and device performance, browser type, language, and operating system. Further details about the technical data that is processed by us can be found below.</li> </ul>

	<p>Our Services use cookies, unique identifiers and similar technologies to collect information about the pages you view, the Services functions that you access, and the buttons and icons you click to make it easier and more efficient for you to use our Services.</p> <p><b>Cookies.</b> Cookies are small data files that are downloaded onto your computer or mobile device when you use our Services, which are unique to your device. Cookies make it easier for you to use the Services by saving your preferences so that we can use these to improve your next and subsequent visits to our Services. Cookies help us learn which areas of our Services are useful and which areas need improvement.</p> <p>Cookies may be either persistent or temporary (or session) cookies. A persistent cookie retains user preferences for a particular website, app or service, allowing those preferences to be used in future use sessions and remains valid until its set expiry date (unless deleted by the user before the expiry date). A temporary cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.</p> <p>You can choose whether to accept cookies by changing the settings on your browser or device. However, if you choose to disable this function, your experience with our Services may be impaired and some features may not work as they were intended. When we use cookies or other similar technologies, we may set the cookies ourselves or ask third parties to do so to help us. For more information on our use of cookies, please review our Cookie Policy located at <a href="https://www.mclanahan.com/legal-notices/">https://www.mclanahan.com/legal-notices/</a>.</p> <p><b>Pixels, Web Beacons.</b> We or third party partners may use invisible pixels or beacons on the Services to count how many users access or use certain pages, features or content. This information is collected and reported in a manner that does not identify individual users, i.e. in the aggregate. We may use this information to improve our current Services offerings, develop new products or services, and provide tailored information to you that may be helpful and useful to you based upon your use of our Services.</p>
<b>Anonymized Information</b>	<p>We use anonymized and aggregated information that may be created or derived from your personal information or usage of the Services for purposes that include data analysis, improving our Services, advertising, and developing new features and functionality within our Services.</p>

### 3. How we may use your information.

We will only use your information for the purposes identified below, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose described here. Some of your personal information, such as a way to identify you, is necessary to enter into our Terms of Use or other agreements we have with you. The provision of all other personal information is voluntary, but may be necessary in order to use our Services, such as receiving a quote or applying to be a dealer.

In the table below, we have set out the reasons why we process your information, the associated legal basis we rely upon to legally permit us to process your information, and the categories of information (identified in “**The information we collect about you**” above) used for these purposes:

Why McLanahan processes your information	Legal basis for the processing purpose	Categories of information used by McLanahan for the processing purpose
To provide the Services to you, which may include providing a requested quote, providing customer support, providing marketing content, and responding to your questions or comments.	<ul style="list-style-type: none"> <li>○ Consent</li> <li>○ Legitimate interest</li> </ul>	<ul style="list-style-type: none"> <li>○ Services Usage Information</li> <li>○ Anonymized Information</li> <li>○ Product Registration Information</li> <li>○ Quote Information</li> <li>○ Dealer Information</li> <li>○ Blog Registration Information</li> </ul>
To personalize and improve your experience with our Services, for example by providing customized or localized content, recommendations, support, and features through our Services.	<ul style="list-style-type: none"> <li>○ Legitimate interest</li> </ul>	<ul style="list-style-type: none"> <li>○ Services Usage Information</li> <li>○ Anonymized Information</li> </ul>
To ensure technical functionality and proper operation of our Services, for example by reviewing information associated with stalled or crashed pages experienced by users allowing us to identify and fix problems and give you a better experience.	<ul style="list-style-type: none"> <li>○ Legitimate interest</li> </ul>	<ul style="list-style-type: none"> <li>○ Services Usage Information</li> <li>○ Anonymized Information</li> </ul>
To monitor the security of our Services and prevent and/or investigate security breaches	<ul style="list-style-type: none"> <li>○ Legitimate interest</li> </ul>	<ul style="list-style-type: none"> <li>○ Services Usage Information</li> </ul>

or other potentially prohibited activities.		<ul style="list-style-type: none"> <li>○ Anonymized Information</li> </ul>
To improve our Services and develop new products and services, for example by reviewing your access to and use of our Services, including your interactions with applications or functionality made available, linked to, or offered through, our Services to learn what is most valuable and helpful to you.	<ul style="list-style-type: none"> <li>○ Legitimate interest</li> </ul>	<ul style="list-style-type: none"> <li>○ Services Usage Information</li> <li>○ Anonymized Information</li> </ul>
To communicate with you for Services-related purposes, such as regarding support issues and information about our Services.	<ul style="list-style-type: none"> <li>○ Consent</li> <li>○ Legitimate interest</li> </ul>	<ul style="list-style-type: none"> <li>○ Services Usage Information</li> </ul>
To communicate with you, either directly or through one of our service providers, for the following purposes: marketing, research, to provide you with a requested quote, to provide our blog, or other promotional purposes, via email, notifications or other messages, consistent with any permissions you may have communicated to us.	<ul style="list-style-type: none"> <li>○ Consent</li> <li>○ Legitimate Interest</li> </ul>	<ul style="list-style-type: none"> <li>○ Quote Information</li> <li>○ Blog Registration Information</li> <li>○ Dealer Information</li> </ul>
We may use your general location information to provide you with features or other content based on your location.	<ul style="list-style-type: none"> <li>○ Legitimate Interest</li> </ul>	<ul style="list-style-type: none"> <li>○ Services Usage Information</li> </ul>
For us to comply with our legal obligations, including assessing compliance with our regulatory requirements (e.g.,	<ul style="list-style-type: none"> <li>○ Legal obligations</li> </ul>	<ul style="list-style-type: none"> <li>○ Services Usage Information</li> <li>○ Anonymized Information</li> </ul>

using user data in the aggregate to assess our obligations under applicable data security and privacy requirements)		
---	--	--

### Legitimate Interests

Where we rely on legitimate interests as the reason for processing your information, we have to carry out a balancing exercise to make sure your rights as an individual are not impacted unnecessarily.

We consider that it is reasonable for us to process your personal information for the purposes of our legitimate interests when, on balance, (a) we process your personal information only so far as is necessary for such purpose, and your rights and freedoms do not outweigh such purposes, and (b) it can be reasonably expected for us to process your personal information in this way. In most cases, the information is being processed for your benefit as well as ours.

We have a legitimate business interest in processing your personal information where:

- We need the information to respond to your inquiries;
- We need the information to send you information; or
- We would be unable to provide our Services without processing your information.

If we wish to process your existing information for a new purpose other than as stated above, we must inform you of that further processing and provide information surrounding your information's use.

With your consent, we may use your personal information to:

- Provide you with marketing via email, direct mail, SMS or text
- Provide you with marketing from third parties, including to develop and deliver targeted advertisements to users

## 4. Who we may share your information with.

In connection with our Services, we may share your personal information with the following types of recipients and for the following reasons:

Categories of Recipients	Reasons for sharing
Service providers and others	We use service providers to operate our software and infrastructure, in particular providers which host, store, manage, and maintain our Services, its content and the data we process. This includes our email marketing, text messaging component for our Services, and information security service providers.



Data analytics providers	<p>We will share your personal information to create general data analytics regarding usage of our Services on an aggregate basis and without personal identifiers.</p> <p>For example, we use Google Analytics, a service provided by Google, Inc., to gather information about how you and other users engage with the Services. For more information about Google Analytics, please visit <a href="http://www.google.com/policies/privacy/partners">www.google.com/policies/privacy/partners</a>.</p>
Law enforcement and data protection authorities	We will share your personal information with third parties where required by law (including to respond to valid legal process such as a search warrant or a court order), where it is necessary in connection with our Services or where we have another legitimate interest in doing so.
Other legal or regulatory authorities	We will share your personal information for us to comply with our legal obligations, including assessing compliance with our regulatory requirements (e.g., using customer order information in the aggregate, including revenues generated in connection with our regulatory tax requirements).
Buyer or successor of our business	We will share your personal information with any buyer or successor in the event of a merger, reorganization, dissolution, or other sale or transfer of title.

Most, if not all, of the third parties with whom we may share your personal information are located and store your information in the United States, although some may store your information outside of the United States.

## 5. Your rights and options regarding your personal information.

Your data belongs to you, not us. Therefore, you have choices about how we use your personal information to communicate with you and send you marketing information. You can opt out from receiving future marketing communications from us at any time by:

- Using the unsubscribe function in the email you receive from us; or
- Contacting us as set forth under “**How to contact us**” above.

Depending on where you live, you may have the following rights with respect to your data under certain circumstances:\*

- The **right to request access** to your personal information and the following information regarding our use of your personal information:

- The purpose of such use
- The categories of your personal information that we have used
- Who we have disclosed your personal information to
- The **right to request us to correct** any inaccurate personal information concerning you.
- The **right to request us to erase** your personal information when we no longer need such data in connection with our Services.
- The **right to withdraw consent** to our use of personal information, if we are relying on consent to use your personal information.
- The **right to request us to restrict** our use of your personal information (e.g., suspend our use of your personal information).
- The **right to object** to our use of your personal information where we are not using it to perform Services you have requested from us.
- The **right to receive** a copy of your personal information.
- The **right to lodge a complaint** with the supervising authority of your country.

*\* The rights listed above apply if you reside in the European Union or European Economic Area. If you want to exercise any of the rights listed above, please contact us through one of the methods listed in under “**How to contact us**” above.*

In addition, regardless of where you live, you have choices available to you through the device or browser you use to access the Services. For example:

- The browser you use lets you control cookies or other types of local data storage. You may select a “do not track” setting on your web browser. However, these features are not yet uniform, so we do not currently respond to such features or signals. Therefore, if you select or turn on a “do not track” feature in your web browser, we and our third-party providers may continue collecting information about your online activities as described in this Privacy Policy. You can learn about how to exercise choice regarding the collection of information about your online activities over time and across third-party websites or online services by visiting [www.aboutads.info](http://www.aboutads.info) and [www.networkadvertising.org](http://www.networkadvertising.org).
- Your mobile device lets you choose how and whether your location, advertising identifiers and other data is shared with us.

## 6. How we safeguard your personal information.

We have put in place appropriate security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

While we are committed to protecting your personal information, please note that information communicated over the Internet is never 100% secure. Any transmission of personal information is at your own risk.

## 7. How long we store your personal information.

We may store your personal information as long as you use our Services to provide you with such Services and for legitimate business purposes.

We may store your personal information following completion of transactions with you to the extent required to comply with our legal, accounting, or reporting requirements and to provide information about our Services (such as your order history) requested by you. Additionally, we may continue to store your personal information contained in our standard back-ups.

Upon your request, we will delete or de-identify your personal information unless we are legally required or allowed to maintain such personal information.

## **8. Links.**

Our Services may provide links to third-party websites that we do not control. We cannot be held responsible for third parties' privacy practices or content provided on these websites. If you click on one of these links, please understand that you are leaving our Service and any information you provide will not be covered by this Privacy Policy. Please read that website's privacy policy before providing any information.

## **9. Children.**

Our Services are not directed to children under the age of eighteen (18) years. By using our Services, you represent that you are at least eighteen (18) years old. If you do not meet this age requirement, then you must not access or use our Services.

We do not knowingly collect information from children under the age of thirteen (13) years old. If you are under the age of thirteen (13) years old, please do not use our Services and do not provide any information to us. For more information about the Children's Online Privacy Protection Act ("**COPPA**"), which applies to websites that direct their services to children under the age of thirteen (13), please visit the Federal Trade Commission's website <https://www.ftc.gov/tips-advice/business-center/guidance/complying-coppa-frequently-asked-questions>.

If you think we have collected information from a child under the age of thirteen (13) through our Services, please contact us through one of the methods listed under "**How to contact us**" above. If we learn that we have collected the information of a child under the age of thirteen (13) years old, we will take reasonable steps to delete such information.

## **10. Special notice to non-U.S. users regarding data transfers.**

We store your personal information in the United States or other locations outside your home country. The privacy protections and the rights of authorities to access your information in these countries may not be the same as in your home country.

If you are located in a country outside the U.S. and submit personal information to us, you consent to the general use and disclosure of such information as provided in this Privacy Policy and to the transfer and/or storage of that information to the U.S. and other countries outside your home country.

## **11. Governing law and jurisdiction.**

This Privacy Policy shall be construed and governed under the laws of the Commonwealth of Pennsylvania (without regard to rules governing conflicts of laws provisions). You agree that venue for all actions, arising out of or relating in any way to your use of our Services, shall be in federal or state court of competent

jurisdiction located in Blair County, Pennsylvania, within one (1) year after the claim arises. Each party waives any objections based on forum non conveniens and waives any objection to venue of any action instituted hereunder to the extent that an action is brought in the courts identified above.