



## **Website Privacy Policy**

Milbank Manufacturing Company ("Milbank") is committed to safeguarding your privacy on our website, located at [www.milbankworks.com](http://www.milbankworks.com). We use this Privacy Policy to clearly disclose to you our privacy practices on our website in a manner that is easy to understand. If there is something you do not understand about our privacy practices, please feel free to contact our compliance officer at [policy@milbankworks.com](mailto:policy@milbankworks.com).

This Privacy Policy does not apply to products or services provided, or information obtained, other than through the website. We may change this policy from time to time so please check back often. If we materially change our privacy practices, we will update this policy and such changes will be effective upon posting. Your continued use of the website after any modification to the Privacy Policy will constitute your acceptance of the new terms. This Privacy Policy is effective as of April 13, 2022.

### **What information is collected?**

We collect information through our website in several ways. Some of the information we collect is personal or identifiable to you. Other information is collected anonymously. We may collect the following categories of information:

- Personal contact information including your name, email address, phone number, company name and other contact information relevant to your request;
- Other information you provide to us, such as a description of problems with our website or an inquiry or correspondence related to our products, services or practices; and
- Device information and certain unique or persistent identifiers such as MAC or IP address, device identifier, customer number or other identifier, and viewing information related to how you interact with our website as well as what type of device and operating system or apps you use to browse our website.

### **How is information collected?**

#### ***Direct Collection***

We primarily collect personal information directly from you when you submit it via our website, such as when you register for a specific type of content, submit a contact form or otherwise request information through our website. If you do not want to share your personal information through our website, you can choose not to participate in a particular inquiry. If you choose not to register or participate, you may not have access to areas that require registration. We may receive information, including personal information, about you from other sources and add it to the information that we have received from you.



### ***Indirect Collection – Cookies and Other Technology***

As part of offering and providing customizable and personalized services, our website may use cookies and other online tracking technologies to store and sometimes track information about you. We may use these technologies to:

- Provide you with personalized content based on your use of our website
- Enable you to more easily use our website by remembering and using contact information and registration information
- Evaluate, monitor and analyze the use of our website and its traffic patterns to help improve our website and services

The types of tracking technologies we use and the primary purposes we use the resulting data for include:

- **Cookies:** A “cookie” is a small line of text that is stored by your web browser on your device for recordkeeping purposes and to help us provide better service to you. We use cookies primarily to customize our website to deliver content specific to your interests and to monitor use and performance of the website. Your browser has options to accept, reject, or provide you with notice when a cookie is sent.
- **Analytics:** We use Google Analytics and Microsoft Clarity to study user behavior on our website for our purposes in improving our website and our products and services. Our use of these services includes heatmaps and session recordings. Heatmaps present us with a visual view of the website activity of our users. Session recordings track user activity for each user's browsing session. We collect this information in an anonymous manner that does not identify you personally. We do not sell any personal information collected through these services. To disable these services, please see "How can I control my personal information?" below.

Please be aware that disabling or revoking consent to the use of cookies may impact your ability to fully utilize certain portions of our website.

- **Web Beacons:** We also employ a software technology called a clear GIF (Graphics Interchange Format), a pixel tag or Web beacon. A web beacon is a line of code that we place on our websites or in emails which allows us to analyze our advertising and the general usage patterns of visitors to our websites. These help us better manage content on our site by informing us what content or promotions are effective.
- **Log Files:** We also use log files which track Internet protocol (IP) addresses, browser



type, Internet service provider (ISP), referring/exit pages, platform/operating system type, date/time stamp, and number of clicks. We utilize this information to analyze trends, administer the site, prevent fraud, track website navigation in the aggregate, and gather broad demographic information for aggregate use.

#### **How is collected information used?**

Our main goal in collecting information is to improve the site and provide you with the best possible experience on the site. For example, by using the information we collect, we can provide you with an easy to use and readily available forum to learn about our products and services and find a Milbank sales representative. We may also use your personal information to:

- Notify you of products or services available from Milbank and our affiliates through periodic messages via mobile, twitter, email, or other platforms;
- Personalize online content so that is applies to you and your interests;
- Maintain or administer our website and make our products, services, and website better;
- Compile, analyze and conduct research on our users' demographics and behavior;
- Detect, investigate and prevent activities that may violate our policies or be illegal;
- Provide various functionalities and services as they are added to our website from time to time; and
- Other uses in furtherance of our business purposes.

#### **Who collects this information?**

Except as provided in this Privacy Policy, only Milbank and our affiliates, service providers, and representatives will have access to your personal account information. When you are on our site and are asked for personal information, you are sharing that information with Milbank and its authorized service providers, affiliates, and representatives.

Other websites to which we link, including sites operated by certain third party services providers and utilizing Milbank branding, may collect personally identifiable information about you when you visit those sites. The information practices of other websites linked to our websites are not covered by this Privacy Policy and are subject to the Privacy Policy and Terms and Conditions of such other site.

#### **With whom does Milbank share information?**

We share your personal information with our affiliates, suppliers, vendors, and/or their agents and employees as we deem necessary for the provision of goods and services to you. Specifically, we may share your personal information or other data (i) with third parties assisting us in the provision, administration, and



management of goods and services generally; (ii) with third parties that assist us in providing goods and services that you request; (iii) with third parties that support our business operations or provide marketing or advertising services on our behalf, including marketing, technical, accounting, legal or other professionals; and (iv) as otherwise required or permitted by law or approved by you. Additionally, we may use your personal information for our general business operations and goods and services provided by us for any purpose(s) if it is in a form that is not capable of being personally identified with you or if it is combined with personal information from one or more other customers in aggregate form that does not personally identify any particular customer. We may also sell, license or otherwise provide such de-identified or aggregated data to third parties.

As we continue to develop our business, we may buy or sell businesses or assets. In the event of a transaction involving the sale of some or all of Milbank's business(es), customer and site visitor information may be one of the transferred assets and may be disclosed in connection with negotiations relating to a proposed transaction. In such case, the transferred information may become subject to a different privacy policy following such transaction.

**How can I control my personal information?**

We offer our customers certain choices for the collection, use and sharing of personal information. You may contact us at [policy@milbankworks.com](mailto:policy@milbankworks.com) to request to view, edit, or update your personal information from our database. We will use commercially reasonable efforts to accommodate your request but reserve the right to refuse to remove or modify any information which we determine is necessary for our business operations, legal purposes, or other reasons.

If you believe that any inaccurate or inappropriate information has been obtained or provided to others through your use of this website, you should contact us at [policy@milbankworks.com](mailto:policy@milbankworks.com).

You may opt-out of Google Analytics collection by downloading the browser plugin "Google Analytics Opt-out Browser Add-on" [here](#). You may opt-out of Microsoft Clarity collection by using the tool available [here](#).

**What security precautions are in place to protect against the loss, misuse, or alteration of my information?**

Because information sent through the Internet travels from computer to computer throughout the world, when you give us information, that information may be sent electronically to servers outside of the country where you originally entered the information. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. Except as specifically stated, this site does not use security encryption measures. Information we collect on our website is not encrypted. Information that you disclose by use of this website, by posting a message or using e-mail, potentially could be collected and used by others. This may result in unsolicited messages from third parties or use of such information



by third parties for their own purposes, legal or illegal. As a result, while we strive to protect your personal information, we cannot ensure or warrant the security of any information you transmit to us or from our services, and you do so at your own risk. Once we receive your transmission, we use a variety of commercially reasonable security technologies to help protect your personal information from unauthorized access, use or disclosure. However, the use of such security technologies is not, and should not be considered to be, any type of guarantee or warranty by us that your personal information will not be accessed by third parties or that we will use all available security technologies to prevent any unauthorized access, use or disclosure. We may permanently delete or destroy any and all personal information at any time as determined by us.

#### **Choice/Opt-out**

To ensure that you will not receive recurring marketing or other information from us unless you choose to, we will provide you with simple instructions on each marketing email from Milbank for you to let us know that you have chosen to stop receiving such emails from us. Such requests may take a reasonable time to become effective.

#### **What else should I know about my privacy?**

Please keep in mind that whenever you voluntarily disclose information online, that information may be accessible to other customers and users. Ultimately, you are solely responsible for maintaining the secrecy of your passwords and/or any account information. Please be careful and responsible whenever you are online.

#### **Links to Other Web Sites**

Our website may contain links to other websites or online services that are operated and maintained by third parties and that are not under the control of or maintained by us. Such links do not constitute an endorsement by us of those other websites, the content displayed therein, or the persons or entities associated therewith. This Privacy Policy does not apply to this third-party content. We encourage you to review the privacy policies of these third-party websites or services.

#### **Children's Privacy**

Our website does not knowingly collect, use, or disclose personal information from children under the age of 13. If we are made aware we have collected personal information from a child under 13 years old in a manner that is inconsistent with the Children's Online Privacy Protection Act ("COPPA"), we will delete this information as soon as possible.

#### **Your California Privacy Rights**

California Civil Code Section 1798.83 permits our visitors who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please contact us via email at [policy@milbankworks.com](mailto:policy@milbankworks.com), or via U.S. mail at:



Milbank Manufacturing Company

Attn: Privacy

4801 Deramus Ave.

Kansas City, MO 64120

*Please state that you are a California Resident.*

#### **Do Not Track**

Do Not Track (DNT) is a privacy preference that users can set in their web browsers. DNT is a simple way for users to inform web services that have been integrated across the Internet (such as buttons, widgets, and other embedded features or content) that they do not want certain information about their webpage visits collected and shared across websites.

The DNT browser setting is only supported by recent versions of certain major browsers. When you activate DNT in your browser, while browsing [Milbankworks.com](http://Milbankworks.com) or any other associated digital property, Milbank has implemented reasonable protocols that will attempt to comply with your browser's settings with respect to DNT. Notwithstanding the foregoing, our website generally limits tracking to the internal uses described above and does not enable the tracking of our users across multiple websites, however other websites to which we link may use tracking features. Please review their privacy policies to understand how you may be tracked.

California Consumer Privacy Act This Privacy Notice for California Residents supplements the information contained in above in our general privacy policy and applies solely to all visitors, users, and others who reside in the State of California.

#### ***Your Rights***

The California Consumer Privacy Act ("CCPA") grants State of California residents the following rights, to:

- 1) Know what personal information is being collected about them;
- 2) Know whether their personal information is sold or disclosed and to whom;
- 3) Say no to the sale of their personal information;
- 4) Access their personal information;
- 5) Have their personal information deleted; and
- 6) Have the right to equal service and price, even if they exercise their privacy rights under this law.

#### ***Categories of Personal Information We Collect***

We collect information that identifies you, your household or your device or is reasonably capable of being connected with or linked to you, your household, or your device ("Personal Information"). Personal information does not include public information available from government records, de-identified or aggregated information or information that is protected by certain laws such as HIPAA for health-related



information and the Gramm-Leach Bliley Act (GLBA) for certain financial information.

We collect the following categories of Personal Information:

- Identifiers
  - First and last name
  - Email address
  - Mailing address
  - Phone number
  - Company name
  - Title
  - Branch Location
  - Internet Protocol (IP) Address
- Personal Information Listed in the California Customer Records Statute
  - The above identifiers
  - Credit card information
- Characteristics of Protected Classifications
  - Not collected
- Commercial Information
  - Return request information
  - Pricing request information
  - Product warranty information
  - Invoice and transaction information
- Biometric Information
  - Not collected
- Internet or Other Electronic Network Activity Information
  - Cookies
  - Domain name
  - Browser type
  - Operating system
  - App usage
  - Device identifiers
  - MAC address
  - Usage data
- Geolocation Data
  - Information that tells us from where you access our website
- Sensory Data
  - Not-collected



- Professional or Employment-Related Information
  - Not collected
- Non-public Education Information
  - Not collected
- Inferences Drawn from Other Personal Information
  - Not collected

#### ***Categories of Sources of Personal Information***

We collect information from the following categories of sources:

- Directly from you. For example: when you register for our online service email us from the Contact page or sign up for marketing emails

#### ***How We Share Your Personal Information***

We share information in each of the above categories as follows:

- All categories of information
  - We will share information in all of the above categories if our company is sold or we engage in a merger or other such transaction.
  - We will share information in all of the above categories of information in connection with a law enforcement request that is compliant with the California Electronic Communications Privacy Act.
- Identifiers
  - We share identifiers with service providers who use that information only to provide services to us such as website development and operating, sending postal mail or email, analyzing website use, job applications, processing payments, processing data, marketing or advertising services, IT services, accounting, and legal services.
- Internet or Other Electronic Network Activity Information
  - We share this information with our data analytics providers

#### ***How We Use Your Information***

See "How is collected information used?" above to learn how we use your information. We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

#### ***How We Retain and Store Your Personal Information***

We retain your personal information for as long as necessary to fulfill the purpose(s) for which we collected it and to comply with applicable laws. We use reasonable security precautions to protect your information while in storage.



### ***Requests to Know***

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - sales, identifying the personal information categories that each category of recipient purchased; and
  - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

### ***Requests to Delete***

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise performing our contract with you. This includes fulfilling a shipping transaction or request, processing an overcharge claim, and processing a cargo claim.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug online services to identify and repair errors that impair existing intended functionality.
4. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
5. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
6. Comply with a legal obligation.



7. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

#### ***How To Submit a Request to Know or a Request to Delete***

To request this information please submit a verifiable consumer request to us by either:

- Emailing us at [policy@milbankworks.com](mailto:policy@milbankworks.com) and asking for a Consumer Request Form
- Mailing us at the mailing address below and asking for a Consumer Request Form

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. To designate an authorized agent, email us at [policy@milbankworks.com](mailto:policy@milbankworks.com) and we will provide you with a form to make a designated agent request.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. To make a request, you must:

- Call or email us to receive a CCPA Consumer Request Form
- Complete the CCPA Consumer Request Form
- Provide sufficient information that allows us to reasonably verify that you are the person about whom we collected personal information or that you are an authorized representative
  - If you request the categories of information we collect, we require your first and last name and your email address.
  - If you request the specific information or to have your information deleted, we require your first and last name, email address and information about your two most recent transactions with us.
- Describe your request with sufficient detail that allows us to understand, evaluate and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

We will try to respond to your request within forty-five (45) days of when we receive it. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and



should allow you to transmit the information from one entity to another entity without hindrance, specifically by electronic mail communication.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

An amendment to the CCPA provides an exemption to the Right to Know and Right to Delete for personal information between a business and a person who is acting as an employee, director, officer, or contractor of a company, partnership, sole proprietorship, nonprofit, or government where the information is used in the context of a business transaction. This exemption is currently set to expire on January 1, 2021. Until that date, we will not respond to requests to know or delete that meet this exemption.

#### ***How To Submit an Opt-Out Request***

We do not and will not sell your personal information to third parties. If we change that practice in the future, we will update our privacy policy and provide an opt-out link pursuant to the CCPA. We will treat any information that we collected prior such a change as though you opted-out of the sale of your personal information.

#### ***Non-Discrimination***

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.



### ***Your Nevada Privacy Rights***

Nevada law (SB 220), permits customers in Nevada to opt-out of the sale of certain kinds of personal information. A sale under Nevada law is the transfer of this personal information to third parties for monetary consideration so these third parties can then re-sell or license the sold information. We do not sell your personal information to third parties as defined in Nevada law. If you are a Nevada resident and wish to opt-out of the sale of your personal information should we change our practices in the

future, you must send a request by email to [policy@milbankworks.com](mailto:policy@milbankworks.com)

### **International Users**

Please note that our website is directed towards users who reside in the United States. By using the website, you consent to the collection, storage, processing, and transfer of your information in and to the United States, or other countries and territories, pursuant to the laws of the United States, which may not offer the same level of privacy protection as your own.

### **Who do users contact with questions or concerns about our Privacy Policy?**

If you need further assistance, please send your questions or comments to [policy@milbankworks.com](mailto:policy@milbankworks.com) or:

Milbank Manufacturing Company

Attn: Privacy

4801 Deramus Ave.

Kansas City, MO 64120