



## Privacy Policy

**LAST UPDATED: June 18, 2018**

This is the Privacy Notice of Century, Inc. as well as our subsidiaries, Century Sun Metal Treating and Century Specialties ("Century"), whose corporate headquarters is located at 2410 W. Aero Park Ct., Traverse City, MI 49686.

### IMPORTANT NOTICE

Century manufactures products and provides services for industrial and commercial applications, (collectively "Products and Services").

Century respects your privacy. This Privacy Notice sets out how Century collects and processes personal data when our Products and Services are used, including the sites [www.centinc.com](http://www.centinc.com) and [www.century-sun.com](http://www.century-sun.com) ("Sites"). This Privacy Notice also provides certain information that is legally required and lists certain rights in relation to personal data under applicable law.

We may amend this Privacy Notice from time to time. We encourage users to check our Privacy Notice regularly to understand how we may process your Personal Data.

### INFORMATION ABOUT PERSONAL DATA PROCESSING

#### Personal Data

This Privacy Notice relates to data about individuals and their interactions with our Products and Services. "Personal Data" is information that can be used to identify an individual, directly or indirectly, alone, or together with other information. Personal Data includes such things as an individual's full name, email address, phone number, precise location, device IDs, and certain cookie and network identifiers. Century collects, uses, and discloses Personal Data as outlined in this Privacy Policy, including to operate and improve the Services and our business; for advertising and marketing; and to provide Products and Services.

#### How We Collect Personal Data

1. When an account is created or an individual utilizes our Products or Services

We collect Personal Data when our Site and Services are used or interacted with, including when individuals register with us, provide their contact information at an industry event, browse our products online, or make purchases from us. This Personal Data may include name, address, phone number, username and password, email address, date of birth, location data, and payment information.

2. When you communicate with us or sign up for promotional materials.

We collect Personal Data when you communicate with us or sign up to receive promotional materials or information.

3. When we collect data from third parties or publicly-available sources.



We may obtain certain data about you from third-party sources to help us provide and improve the Services and for marketing and advertising. We may combine your Personal Data with data we obtain from our Services, other users, or third parties to enhance your experience and improve the Services.

4. When we leverage and/or collect cookies, device IDs, Location, data from the environment, and other tracking technologies.

We may collect certain Personal Data using cookies and other technologies, such as device IDs, geolocation, Flash cookies, and IP addresses. We specifically use browser cookies for different purposes, including cookies that are strictly necessary for functionality and cookies that are used for performance/analytics. Our Use of Cookies section contains more information and options to control or opt-out of certain data collection or uses.

5. Users Under 18 Years of Age

We do not knowingly collect Personal Data online from individuals under 18 years without parental consent. If you become aware that an individual under 18 years of age has provided us with Personal Data without parental consent, please contact us through our [website contact form](#) with the subject of GDPR/Privacy. If we become aware that an individual under 18 has provided us with Personal Data without parental consent, we will take steps to remove the data unless required to retain by law.

### **How We Share Personal Data**

We may share your Personal Data as described in this Privacy Notice, including:

1. To Affiliates and Partners.

With companies or ventures that are owned or controlled by Century, and internally within Century, in order to provide and improve Services, for marketing purposes, for advertising, and for analytics.

2. To Service Providers and Vendors.

With business partners, marketing partners, and vendors to provide, improve, and personalize the Services.

3. For Advertising and Marketing.

With advertising and marketing partners for advertising and marketing purposes on Century's behalf and on behalf of third parties.

4. For Certain Analytics and Improvement.

With certain companies for purposes of analytics and improvement of the Services.

5. Actual or Contemplated Sale, Acquisition, or Reorganization.

In connection with a contemplated reorganization or an actual reorganization of our business, in connection with financing, a sale, acquisition or other transaction involving the disposal of all or part of our business or assets, including for the purpose of permitting the due diligence required to decide whether to proceed with a transaction.



## LEGAL BASIS FOR PROCESSING

We collect and process your personal data for a variety of different purposes which are set out in further detail below.

In some cases, we will ask for consent so that we may process Personal Data. However, in certain circumstances, data protection laws allow us to process Personal Data without needing to obtain your consent. In the U.S., individuals typically provide consent when they receive notice of this Privacy Notice. This section addresses the legal basis for processing Personal Data if the individual resides outside the U.S.

### Processing Personal Data Where Consent Not Obtained

In certain cases, separate consent is not required, including:

1. For the performance of a contract.

To perform our contractual obligations, including fulfilling orders or purchases made, making contact in relation to any issues with an order or use of the Products or Services or where we need to provide Personal Data to our service providers related to the Products or Services.

2. To comply with legal obligations.

To comply with laws, regulators, court orders, or other legal obligations, or pursuant to legal process.

3. Legitimate Interests.

To operate our business and provide the Services, other than in performing our contractual obligations for Century's "legitimate interests" for the purposes of applicable law, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. Legitimate interests may include:

- To communicate regarding the Products and Services, including to provide important notices regarding changes to our [Terms & Conditions](#) and to address and respond to requests, inquiries, and complaints.
- To send surveys in connection with our Products and Services.
- To assist in the investigation of suspected illegal or wrongful activity, and to protect and defend our rights and property, or the rights or safety of third parties.
- To develop, provide, and improve our Products and Services.
- To enforce agreements with third parties.

### Matters That May Require Consent

In cases where we are not already authorized to process the Personal Data under applicable law, we may ask for consent to process Personal Data, including:

1. Marketing



We may ask for consent to make contact by telephone, SMS, post and/or email about other offers, products, promotions, developments or services which we think may be of interest and for other marketing purposes.

## 2. Use of Cookies

The Site uses cookies to improve user experience.

A "cookie" is a small text file that a web server stores in browser software. A browser sends cookies to a server when the browser makes a connection to the server (for example, when requesting a web page from the same domain that created the cookie). The purpose of cookies is to remember the browser over time and distinguish one browser instance (or user) from all others. Some cookies and other technologies may serve to recall Personal Data previously indicated by a web user. Most browsers allow users to control cookies, including whether or not to accept them, and how to remove them. Cookies can remember login information, preferences, and shopping cart contents. Other cookies, often placed by our partners or other third parties, are used for analytics, marketing, or advertising.

Cookies, as well as other tracking technologies, such as Local Shared Objects (such as "Flash" cookies), and similar mechanisms, may record information such as Internet domain and host names; Internet protocol (IP) addresses; browser software and operating system types; and dates and times that our Site is accessed.

Cookies used for analytics may use non-Personal Data that is not directly linked to an individual. We use analytics to improve our Site and Services.

Users are advised that if they wish to deny the use and saving of cookies from the Site on to their computer's hard drive, they should take necessary steps within their web browser's settings to block all cookies from the Site and its external serving vendors. Please note that if the choice is made to erase or block cookies, the user may need to re-enter their original user ID and password to gain access to certain parts of the Site. For information on how to disable cookies, refer to your browser's documentation.

### **Withdrawing Your Consent (Outside U.S.)**

An individual may at any time withdraw the consent provided for the processing of Personal Data for the purposes set forth in this Privacy Notice by requesting removal through our [website contact form](#) provided that we are not required by applicable law or professional standards to retain such information.

If an individual wants to stop receiving future marketing messages and materials, they can do so by clicking the "unsubscribe" link included in our email marketing messages. Please remember that even if an individual opts out of receiving marketing emails, we may still send important Product and Service information related to products, services and accounts.

### **DE-IDENTIFIED OR ANONYMIZED DATA**

We may create de-identified or anonymous data from Personal Data by excluding data components (such as name, email address, or linkable tracking ID) that makes the data personally identifiable to an individual



or through obfuscation or through other means. Our use of anonymized data is not restricted by this Privacy Notice.

#### **DATA RETENTION**

We will retain Personal Data for as long as an account is maintained or as otherwise necessary to provide Products and Services. We will also retain your Personal Data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Where permissible, we will also delete Personal Data upon request, as further described in the Data Subject Access, Modification, and Deletion Rights section of this Privacy Notice.

#### **ANALYTICS**

Individuals can elect to block browser cookies from first parties (such as those from our website) and browser cookies from third parties by using the cookie blocking options built into your browser software. If you block browser cookies, some parts of our website may not function correctly. Also, blocking cookies will not stop third-parties from collecting IP address, data stored in "Flash" cookies, and certain other types of technical information that may uniquely identify a browser.

#### **Do-Not-Track**

Due to the lack of consensus around a Do Not Track standard, our websites do not change how they collect or track data when they receive the "Do Not Track" flag.

#### **WHY WE COLLECT AND PROCESS PERSONAL DATA**

We need to process certain types of Personal Data in order to fulfil our contractual obligations and to provide Products and Services.

Where we ask for consent to process Personal Data, individuals have the right to withdraw such consent as described in this Privacy Notice. Please note, however, we may be unable to provide certain Products or Services that require the use of Personal Data.

Please note that even where consent would otherwise be required, we may nevertheless process your Personal Data in accordance with our legitimate interests under applicable law, as described in this Privacy Notice.

#### **TRANSFER AND STORAGE OF PERSONAL DATA**

Data for Century and our associated Products and Services are stored on servers in the United States. If you are located outside of the United States, please be aware that Personal Data we collect will be processed and stored in the United States.

By using our Services and/or submitting Personal Data, individuals agree to the transfer, storage, and/or processing of Personal Data in the United States.



### **DATA SUBJECT ACCESS, MODIFICATION, AND DELETION RIGHTS (OUTSIDE U.S.)**

Individuals have the right in certain circumstances to request confirmation from us as to whether or not we are processing Personal Data. Where we are processing Personal Data, individuals also have the right to request access to, modification of, or deletion of such Personal Data.

Individuals have the right in certain circumstances to receive the Personal Data concerning them that they provided to us and have the right in certain circumstances to transmit such data to another controller.

To exercise these rights with respect to Personal Data, please contact us at through our [website contact form](#) with the subject of GDPR/Privacy. As permitted by law, certain data elements may not be subject to access, modification, and/or deletion. We reserve the right to charge for this service where allowed by law. We will respond to reasonable requests as soon as practicable and as required by law.

### **RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY (OUTSIDE U.S.)**

You may have a right to lodge a complaint with a supervisory authority.

### **SECURITY SAFEGUARDS AND LINKS TO OTHER WEBSITES**

We implement technical and organizational safeguards to protect against unauthorized or unlawful processing of Personal Data and against the accidental loss, destruction, or damage of Personal Data. Please be advised, however, that we cannot fully eliminate security risks associated with the storage and transmission of Personal Data.

This Privacy Notice only applies to our Site. Our Site, Products or Services may provide a link or otherwise provide access to another website, mobile application, or Internet location (collectively "**Third-Party Sites**"). We provide these links merely for your convenience. We have no control over, do not review, and are not responsible for Third-Party Sites, their content, or any goods or services available through the Third-Party Sites. Our Privacy Policy does not apply to Third-Party Sites, and any data you provide to Third-Party Sites, you provide at your own risk. We encourage you to review the privacy policies of any Third-Party Sites with which you choose to interact.

### **YOUR CALIFORNIA PRIVACY RIGHTS (U.S. ONLY)**

Under Section 1798.83 of the California Code, residents of California have the right to request from a business, with whom the California resident has an established business relationship, certain information with respect to the types of Personal Data the business shares with third parties for those third parties' direct marketing purposes, and the identities of the third parties with whom the business has shared such data during the immediately preceding calendar year. To exercise your rights, you may make one request each year by contacting us through our [website contact form](#) with the subject of GDPR/Privacy with "Request for California Privacy information" on the subject line and in the body of your message. Be sure to provide in the request sufficient information to properly identify you and/ or the members of your family.

### **CONTACT US**

For questions regarding this Privacy Notice, please contact us through our [website contact form](#) with the subject of GDPR/Privacy.