

# Privacy Policy

Last Updated: June 14, 2022

LockeyUSA together with other companies (collectively, “PrimeSource,” “we,” “our,” or “us”), respects the privacy of your information. This Privacy Policy (“Policy”) is designed to assist you in understanding how PrimeSource collects, uses and safeguards the information you provide to us in using our websites (“Sites”), the services provided through our Sites and the mobile applications we offer (collectively, “Services”).

This Policy covers the following topics:

## Types of Information We Collect

PrimeSource collects Personally Identifiable Information from you through your use of the Sites and Services. “Personally Identifiable Information” is individually identifiable information about an individual consumer that we collect online and that we maintain in an accessible form. Here are some examples of the information we may collect:

- **Contact Information.** For example, we may collect your name, email address, telephone number, and mailing address.
- **Business Contact Information.** For example, your company’s name, address, and telephone number.
- **Usage Information.** For example, the pages on the Sites you access, the frequency of access, and what you click on while on the Sites.
- **Device Information.** For example, we may collect the type of device you use to access our Sites. We may also collect your device identifier, IP address, mobile network information, or mobile operating system.
- **Location Information.** We may collect location information on a city-regional basis.

- **Other Information.** If you use our Sites, we may collect information about the browser you are using. We might look at what site you came from, or what site you visit when you leave us.

## How We Collect Your Information

PrimeSource collects your Personally Identifiable Information in different ways. Below are some examples of how we may collect your information.

- **Directly From You.** For example, when you submit a request or question to us or participate in a promotion.
- **Passively.** For example, when you visit and navigate our Sites on any device, we may also collect information about your use of the Sites over time and across different devices.
- **From Third Parties.** We may receive information about you from other sources. For example, this may include receiving information from our business partners, including analytics vendors, and from advertising networks.

In some cases, we may receive certain Personally Identifiable Information from you about a third party. If you submit any Personally Identifiable Information about another individual to us, you are responsible for making sure that you have the authority to do so and to allow us to use their Personally Identifiable Information in accordance with this Policy.

## How We Use Your Information

Examples of how we may use your Personally Identifiable Information include:

- **To Contact You.** This could include sending you our newsletters or blogs to which you subscribe and contacting you regarding our products and services that we feel may be of interest to you.
- **To Improve Our Business.** We may use your information to make our Sites and Services better and otherwise efficiently maintain our companies.

- **To Respond to Your Requests or Questions.** This may include responding to your feedback or inquiry.
- **For Security Purposes.** This could include protecting our companies and other consumers who use our products and services. It may also include protecting our Sites.
- **To Defend Our Legal Rights and the Rights of Others.**
- **As Otherwise Permitted or Required by Law or As We May Notify You.**

## How We Share Your Information

We may share your information in the following ways:

- **Internally.** This could include sharing with our affiliates to respond to your requests and with other PrimeSource companies.
- **With Our Service Providers.** For example, we may share your information with service providers who perform data or site-related services on our behalf (e.g., email, hosting, analysis, etc.). This may also include sharing your information with service providers to prepare, deploy, and analyze advertising content.
- **With Any Successors to All or Part of Our Business or One of Our Brands.** We may share your information with any other person or entity as part of any business or asset sale, equity transaction, merger, acquisition or in preparation for any of these events.
- **To Comply with the Law or To Protect Ourselves.** We may share your information to the extent we are required to do so by law; in connection with any legal proceedings or prospective legal proceedings; to establish, exercise, or defend our legal rights, including providing information to others for the purposes of fraud prevention; and to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that Personally Identifiable Information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that Personally Identifiable Information.

- **To Any Other Person or Entity for Other Reasons We May Describe to You.**

## “Do Not Track” Signals

Some internet browsers incorporate a “Do Not Track” feature that signals to websites you visit that you do not want to have your online activity tracked. Given that there is not a uniform way that browsers communicate the “Do Not Track” signal, our Sites do not currently interpret, respond to or alter their practices when they receive “Do Not Track” signals.

## Children Under 13

Our Sites are not intended for children under the age of 13. We do not knowingly collect, use, or disclose personal information from children under 13.

## Cookies & Other Tracking Technologies

Like many other companies, we use cookies and other tracking technologies (such as pixels and web beacons) (collectively, “Cookies”). “Cookies” are small files of information that are stored by your web browser software on your computer hard drive, mobile or other devices (e.g., smartphones or tablets).

We use Cookies to:

- Estimate audience size and usage patterns;
- Understand and save your preferences for future visits, allowing us to customize the Sites and Services to your individual needs;
- Advertise new content and services that relate to your interests;
- Keep track of advertisements and search engine results;
- Compile aggregate data about site traffic and site interactions to resolve issues and offer better site experiences and tools in the future; and
- Recognize when you return to the Sites.

We set some Cookies ourselves and others are set by other entities. We use Cookies set by other entities to provide us with useful information to help us improve our Sites and Services, to conduct advertising, and to analyze the effectiveness of advertising. For example, we use Cookies from Google and other similar companies.

## **How You Can Opt-Out of Cookies**

### *Browser Settings*

Your browser may give you the ability to control cookies or other tracking tools. How you do so depends on the type of tool. Certain browsers can be set to reject browser cookies. You can find out more about Cookies and how to manage them by visiting [www.allaboutcookies.org](http://www.allaboutcookies.org).

### *Platform Controls*

You can opt out of Cookies set by by following the instructions found at this link: <https://adssettings.google.com>.

### *Advertising Industry Resources*

You can understand which entities have currently enabled Cookies for your browser or mobile device and how to opt-out of some of those Cookies by accessing the [Network Advertising Initiative's website](#) or the [Digital Advertising Alliance's website](#) . For more information on mobile specific opt-out choices, visit the [Network Advertising Initiative's Mobile Choices website](#) .

Please note that these opt-out mechanisms are specific to the device or browser on which they are exercised. Therefore, you will need to opt out on every browser and device that you use.

## **Google Analytics**

We use Google Analytics, a web analytics service provided by Google, Inc. Google Analytics uses Cookies or other tracking technologies to help us analyze how users interact with the Sites and Services, compile reports on their activity, and provide other services related to their activity and usage. The technologies used by Google may collect information such as your IP address, time of visit, whether you are a returning visitor, and any referring website. The technologies used by Google Analytics do not gather information that personally identifies you. The information generated by Google Analytics will be transmitted to and stored by Google and will be subject to Google's [privacy policies](#). To learn more about Google's partner services and to learn how to opt-out of tracking of analytics by Google, click [here](#).

## Google reCAPTCHA

Certain of our Sites use Google reCAPTCHA, a free service provided by Google, Inc., to protect our Sites from spam and abuse. Google reCAPTCHA uses advanced risk analysis techniques to decipher humans and bots. Google reCAPTCHA works differently depending on what version is deployed. For example, you may be asked to check a box indicating that you are not a robot or Google reCAPTCHA may detect abusive traffic without user interaction. Google reCAPTCHA works by transmitting certain types of information to Google, such as the referrer URL, IP address, visitor behavior, operating system information, browser and length of the visit, cookies, and mouse movements. Your use of Google reCAPTCHA is subject to Google's [Privacy Policy](#) and [Terms of Use](#). More information as to Google reCAPTCHA and how it works is available [here](#).

## Session Replay Analytics

The Sites may use Hotjar or similar platforms in order to better understand our users' needs and to optimize the Services and experience. Hotjar is a technology service that helps us better understand our users' experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our Service with user feedback. Hotjar uses Cookies and other technologies to collect data on our users' behavior and their devices. This includes a device's IP address (processed during your session and stored in a de-identified form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), and the preferred language used to display our Sites. Hotjar stores this information on our behalf in a pseudonymized user profile. Hotjar is contractually forbidden to sell any of the data collected on our behalf. For further details, please see Hotjar's [privacy policy](#). You can opt-out to the creation of a user profile, Hotjar's storing of data about your usage of our Sites and Hotjar's use of tracking cookies on other websites by following the directions found [here](#).

## Third Party Processors

To ensure that your Personally Identifiable Information receives an adequate level of protection, we have put in place appropriate procedures with the service providers we share it with to ensure that it is treated consistent with applicable data security and privacy laws. For example, certain of our Sites use third-party payment processors and marketing service providers.

## Choices About Marketing Communications

To unsubscribe from our marketing emails, please click the unsubscribe link included in the footer of our emails. You also may submit a request to us by contacting us as provided below under “How to Contact Us”.

## Notice to Nevada Residents

Nevada law allows Nevada residents to opt-out of the sale of certain types of personal information. Subject to several exceptions, Nevada law defines “sale” to mean the exchange of certain types of personal information for monetary consideration to another person. We do not currently sell personal information as defined in the Nevada law. However, if you are a Nevada resident, you still may submit a verified request to opt-out of sales and we will record your instructions and incorporate them in the future if our policy changes. Opt-out requests may be sent to [privacy@primesourcebp.com](mailto:privacy@primesourcebp.com).

## Notice to California Residents

The California Consumer Privacy Act (CCPA) requires that we provide California residents with a privacy policy that contains a comprehensive description of our online and offline practices regarding the collection, use, disclosure, and sale of personal information and of the rights of California residents regarding their personal information. This section of the Policy is intended solely for, and is applicable only as to, California residents. If you are not a California resident, this does not apply to you and you should not rely on it.

The CCPA defines “personal information” to mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household. Personal information does not include publicly available, deidentified or aggregated information. For purposes of this “Notice to California Residents” section we will refer to this information as “Personal Information.”

The CCPA contains an exception that is relevant to us. Some of the CCPA’s privacy rights explained below do not apply to personal information collected in a business-to-business context. That is information reflecting a written or verbal communication or a transaction between us and a consumer, where the consumer is acting as an employee, owner, director, officer, or contractor of another entity and when the communication or transaction occur solely within the context of us conducting due diligence regarding, or providing or receiving a product or service to or from such entity.

### **Right to Know About Personal Information Collected, Disclosed, or Sold**

If you are a California resident, you have the right to request that we disclose what Personal Information we have collected about you in the 12-month period preceding your request. This right includes the right to request any or all of the following:

- Specific pieces of Personal Information that we have collected about you;
- Categories of Personal Information that we have collected about you;
- Categories of sources from which the Personal Information was collected;
- Categories of Personal Information that we sold (if applicable) or disclosed for a business purpose about you;
- Categories of third parties to whom the Personal Information was sold (if applicable) or disclosed for a business purpose; and
- The business or commercial purpose for collecting or, if applicable, selling Personal Information.

### **Collection of Personal Information**

We currently collect and, in the 12 months prior to the Last Updated date of this Policy, have collected the following categories of Personal Information:

- Identifiers (name, postal address, online identifier, IP address, email address, account name)
- Unique personal identifiers (device identifier; cookies, beacons, pixel tags, mobile ad identifiers, or other similar technology; customer number)
- Telephone number
- Internet or other electronic network activity information (browsing history; search history; and information regarding a consumer's interaction with the Sites, application or advertisement)
- Geolocation data
- Commercial information (records of products or services purchased, obtained or considered)
- Professional or employment-related information (e.g., company name and role)
- Audio and visual information (e.g., contest photo submissions)



- Inferences drawn from above information to create a profile about a consumer reflecting the consumer's preferences

The Personal Information is collected from California residents directly and from advertising networks, internet service providers, data analytics providers, and operating systems and platforms. Not all categories of Personal Information are collected from each source.

In addition to the purposes stated above in the section "How We Use Your Information", we currently collect and have collected and sold the above categories of Personal Information for the following business or commercial purposes:

- Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity
- Debugging to identify and repair errors that impair existing intended functionality
- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, and providing advertising, marketing, and analytic services
- Undertaking internal research for technological development and demonstration
- Undertaking activities to verify or maintain the quality or safety of our services or products, and to improve, upgrade, or enhance same
- Commercial purposes, such as by inducing another person to buy, join, subscribe to, provide, or exchange products, goods, information, or services, or enabling or effecting, directly or indirectly, a commercial transaction

## **Disclosure or Sale of Personal Information**

The following table identifies the categories of Personal Information that we disclosed for a business purpose to service providers or sold to third parties in the 12 months preceding the Last Update date

of this Policy and, for each category, the category of service providers or sold to third parties to whom the Personal Information was disclosed or sold. We do not knowingly collect or sell the Personal Information of minors under 16 years of age.

Category of Personal Information	Category of Service Providers	Category of Third Parties
name, postal address, company name and role, email address, account name, telephone number	Fulfillment providers, marketing agencies, email service providers, legal and accounting service providers	
online identifier, IP address, device identifier, cookies, beacons, pixel tags, mobile ad identifiers	Data analytics providers	Advertising networks
browsing history, search history, and information regarding a consumer's interaction with the Sites, application or advertisement; records of products or services purchased, obtained or considered; geolocation data	Data analytics providers, marketing agencies	
Inferences drawn from above information to create a profile about a consumer reflecting the consumer's preferences		Advertising networks

## **Right to Request Deletion of Personal Information**

If you are a California resident, you have the right to request that we delete the Personal Information about you that we have collected. However, per the CCPA, we are not required to comply with a request to delete if it is necessary for us to maintain the Personal Information in order to, for example, complete a transaction, detect security incidents, comply with a legal obligation, or otherwise use the Personal Information, internally, in a lawful manner that is compatible with the context in which you provided the information.

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

You may submit a request to know or delete by calling us toll free at 972.999.8500 or by emailing us at [privacy@primesourcebp.com](mailto:privacy@primesourcebp.com).

## **Our Process for Verifying a Request to Know or Delete**

If we determine that your request is not subject to an exemption or exception, we will comply with your request upon verification of your identity and, to the extent applicable, the identity of the California resident on whose behalf you are making such request. We will verify your identity either to a “reasonable degree of certainty” or a “reasonably high degree of certainty” depending on the sensitivity of the Personal Information and the risk of harm to you by unauthorized disclosure or deletion as applicable.

For requests to access categories of Personal Information and for requests to delete Personal Information that is not sensitive and does not pose a risk of harm by unauthorized deletion, we will verify your identity to a “reasonable degree of certainty” by verifying at least two data points that you previously provided to us and which we have determined to be reliable for the purpose of verifying identities.

For requests to access specific pieces of Personal Information or for requests to delete Personal Information that is sensitive and poses a risk of harm by unauthorized deletion, we will verify your identity to a “reasonably high degree of certainty” by verifying at least three pieces of Personal Information previously provided to us and which we have determined to be reliable for the purpose of verifying identities. In addition, you will be required to submit a signed declaration under penalty of perjury stating that you are the individual whose Personal Information is being requested.

## **Right to Opt-Out of Sale of Personal Information**

If you are a California resident, you have the right to direct businesses to stop selling your Personal Information.

The CCPA defines “sell” to mean selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a California resident’s Personal Information to another business or a third party for monetary or other valuable consideration.

Certain of the Sites’ use of certain third-party cookies may constitute “sales” under the CCPA. To exercise your right to opt-out of this “sale” of Personal Information, please submit a request to opt-out of sales through our interactive webform available by clicking on this link: “Do Not Sell My Personal Information.” If you have enabled privacy controls on your browser (such as a plugin), we will also treat that as a valid request to opt-out.

### **Right to Non-Discrimination for the Exercise of a California Resident’s Privacy Rights**

We will not discriminate against California residents if they exercise any of the rights provided in the CCPA as described in this section “Notice to California Residents.”

### **Authorized Agents**

If you are submitting a request on behalf of a California resident, please submit the request through one of the designated methods discussed above. After submitting the request, and if the request is not subject to an exemption or exception, we will require additional information to verify your authority to act on behalf of the California resident.

### **Shine the Light Law**

We do not disclose personal information obtained through our Sites to third parties for their direct marketing purposes. Accordingly, we have no obligations under California Civil Code § 1798.83.

## **Security**

The Internet is not 100% secure. We cannot promise that your use of our Sites will be completely safe. We encourage you to use caution when using the Internet. We use commercially reasonable means to safeguard the Personally Identifiable Information under our control from loss, misuse, destruction, or unauthorized access but cannot guarantee absolute security.

## **Links**

Our Sites may contain links to other third-party sites that are not governed by this Policy. If you click on a link to a third-party site, you will be taken to a site we do not control. We are not responsible for the privacy practices used by third-party sites. We suggest that you read the privacy policies of those sites carefully. We are not responsible for these third-party sites.

## Accessibility

We are committed to ensuring this Policy is accessible to individuals with disabilities. If you wish to access this Policy in an alternative format, please contact us as described below.

## How to Contact Us

If you have any questions, comments, or concerns with respect to our privacy practices or this Policy, or wish to update your information, please feel free to contact us at [privacy@primesourcebp.com](mailto:privacy@primesourcebp.com).

## Changes in Policy

From time to time, we may change our Policy. If we do, we will post an updated copy on this webpage. Please review this Policy periodically for updates.