

PRIVACY POLICY

Last Updated / Effective Date: October 20, 2023

ORBIS Corporation (“ORBIS,” “we,” “us,” or “our”) takes your privacy seriously. This Privacy Policy describes the information that is collected through your interactions with ORBIS and the Site (defined below), and how that information is used, shared, and protected. **Please see the end of this Privacy Policy for additional terms that apply to persons located in the European Economic Area and the United Kingdom (collectively, the “EEA”), and residents of Mexico, Canada, or California.**

Our relationship with our customers is governed by additional separate agreements executed with such customers, and our relationship with our employees is governed by separate policies and handbooks.

This Privacy Policy applies to the following websites: <https://www.orbiscorporation.com> and <https://lewisbins.com> (individually or collectively, as the context so requires, the “Site”). This Privacy Policy does not apply to the information gathered by ORBIS' affiliates Menasha Corporation or Menasha Packaging Company, LLC. Please see the websites for those affiliates for their applicable privacy policies.

The Site may include links to websites and/or applications operated and maintained by third parties. Please note that we have no control over the privacy practices of websites or applications that we do not own. We encourage you to review the privacy practices of those third parties.

If you wish to access this Privacy Policy in an alternate format or require an accommodation to access this Privacy Policy, please contact us at info@orbiscorporation.com.

BY ACCESSING OR USING THE SITE, YOU REPRESENT THAT YOU HAVE READ AND YOU UNDERSTAND THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THE TERMS OF THIS PRIVACY POLICY, DO NOT ACCESS THE SITE OR SEND US PERSONAL INFORMATION.

- 1. CONSENT TO ORBIS’ TERMS OF USE.** If you use the Site, you must comply with our Terms of Use found at <https://docs.orbiscorporation.com/termsfuseUSwebsite> (“Terms of Use”). If you do not agree to the Terms of Use, you may not use the Site.
- 2. MODIFICATIONS TO THIS PRIVACY POLICY.** ORBIS reserves the right to modify or amend this Privacy Policy at any time. All changes will be effective immediately upon posting to the Site. Material changes will be conspicuously posted on the Site. If you do not agree to any modified terms posted to the Site, do not access the Site or send us any Personal Information (defined below).
- 3. CATEGORIES OF PERSONAL INFORMATION WE COLLECT.** ORBIS may collect and store personal information, which is information that can be used to identify, locate, or contact a person, such as your name, email address, phone number, mailing address, and automatically collected electronic information relating to your browsing activities on the Site (“Personal Information”). ORBIS may collect and store the following types of Personal Information:

- A) Information You Provide to Us.** We receive and store any information you provide in relation to your use of the Site, such as when you create an account. This may include any direct Personal

Information you provide in conjunction with creating an account, such as name and contact information.

- B) **Employment Information.** When you access the Careers page on the Site, you are directed to Menasha Corporation's website. Menasha Corporation is an affiliate of ORBIS. Menasha Corporation uses a third-party service provider, Enlighten Solutions, LLC d/b/a SourceMob, to host the Menasha Corporation Careers page. Your use of the Menasha Corporation careers site is not governed by this Privacy Policy.
- C) **Information Automatically Collected.** ORBIS may collect and store information from and about you automatically when you use the Site. For example, ORBIS may collect information such as your type of browser, your type of operating system, search requests, website traffic information, the date and time you visited the Site, the amount of time you used the Site, the pages you visited on the Site and the products you viewed, the device you are using to access the Site, and hyperlinks you click on when using the Site. See [Section 4\(H\)](#) below for additional information.
- D) **Information We Do Not Intend to Collect.**
 - i. **Special Categories of Personal Data.** “Special Data” are any data that reveals your racial or ethnic origin, political views or opinions, religious, moral or philosophical beliefs, trade union membership, genetic data, biometric data, health, or sex life and/or sexual orientation. The data ORBIS collects and processes does not qualify as Special Data. Unless specifically requested during the job application process for those employed in the United States, we do not intend to collect any Special Data from you. Please refrain from entering, posting, or sending us any Special Data.
 - ii. **Information from Children.** The Site is not directed toward anyone under the age of eighteen (18) years old, or under the age of majority in your place of residence. If you are under this age, please stop using the Site.

4. HOW WE COLLECT INFORMATION FROM YOU.

- A) **When You Communicate with Us.** We collect Personal Information when you voluntarily provide it to us and communicate with us. For example, when you call, mail, or email us, or when you post on the Site.
- B) **When You Create an ORBIS Access Account.** We collect Personal Information when you register for and create an ORBIS Access account or a LewisBins+ account (“Account”). To create an Account, you must submit your first and last name, company name, address, phone number, email address, and an ORBIS employee that you are in contact with. You can monitor the status of certain product orders using your Account. We may change the information we request from time to time, but the information we request from you will be the same type of information as listed in this Section unless otherwise stated on the Site.
- C) **When You Request Information.** We collect Personal Information when you request information through the Site on the “Request Info” or “Request Quote” page. In these instances, we collect first and last name, company name, email address, phone number, address, and a message regarding your request. We may change the information we collect from time to time, but the information we request from you will be the same type of information as listed in this Section unless otherwise stated on the Site.

- D) **When You Apply for Jobs with ORBIS.** If you send us a resume or other application materials to apply to work for ORBIS, we will only use those materials to evaluate your qualifications to work for ORBIS or its affiliates, and to otherwise consider or respond to your inquiry.
- E) **At Tradeshows.** We collect Personal Information if you provide it to us at a tradeshow, such as an address, email address, and phone number. We may use this information to send you communications about our goods and services. You can unsubscribe any time by following the instructions in [Section 11](#) or by contacting us as set forth in [Section 14](#) below.
- F) **On Social Media.** We may collect and store any information that you post on our Social Media (defined below) accounts, such as your name, social media handle, and public posts or comments you make on social media networks.
- G) **When You Make a Purchase.** We may collect Personal Information from you when you directly purchase goods or services from us. The contract between ORBIS and its customers may address how we treat any Personal Information you provide us.
- H) **Automatically — Cookies and Other Tracking.**

What types of online tracking mechanisms do we use? We may use cookies, web beacons, pixel tags, and other tracking technologies (collectively, “**Cookies**”) on the Site.

What are cookies, web beacons, and pixel tags? A cookie is a small text file that the Site saves onto your computer or device when you use the Site that provides us certain information about your activities. Cookies allow the Site to remember your actions and preferences and recognize you or your browser, along with some information you provided. Web beacons and pixel tags are small graphics on a webpage or email that monitor your activity when viewing a webpage or email.

Why do we use Cookies? We use Cookies to:

- make the Site function properly;
- allow you to access your Account information;
- provide us and our service providers with information that we will use to provide personalized experiences, such as to change the language on the Site;
- tailor our interactions with you;
- help with our marketing efforts;
- provide us with valuable data and statistics about the usage and effectiveness of the Site and to help us improve the Site;
- measure the effectiveness of our marketing campaigns and understand engagement with our emails (such as if messages have been opened, acted on, or forwarded); and
- help us improve our services.

What type of information do Cookies collect? The Cookies on the Site may collect information such as:

- IP addresses assigned to the computers and other devices you use;
- your internet service provider;
- device ID number;

- approximate geographic location;
- browser type;
- Site pages visited;
- websites you access before and after visiting the Site; and
- data related to how and when you use the Site (such as the pages most read, time spent, search terms, and other engagement data) or engage with our advertising or communications.

How long do Cookies last? A Cookie can either be a “session” Cookie or a “persistent” Cookie. Session Cookies exist only for so long as you are visiting the applicable site and are typically deleted when you exit your web browser. Persistent Cookies exist for a set period of time, for example, up to several months or years. Each time you visit a site that has implemented a persistent Cookie, the persistent Cookie is renewed and that Cookie will remain active until its predetermined expiration date. You can manually delete persistent Cookies through your browser settings.

Third-party Cookies. Cookies may either be “first-party” or “third-party” Cookies. A first-party Cookie allows your web browser to talk to the actual site that you are visiting (e.g., the Site). A third-party Cookie allows your web browser to talk to a third-party website, such as the source of an ad that appears on the website you are visiting or a third-party analytics provider.

How do you manage Cookies or Opt Out? Most browsers automatically accept cookies. You can disable this function by changing your browser settings, but disabling cookies may impact your use and enjoyment of the Site. Not all features or functions of the Site may work properly if you disable Cookies. You cannot disable all Cookies, such as Cookies that are essential to the functioning of the Site.

Many advertising companies that collect information for interest-based advertising are members of the Digital Advertising Alliance (DAA) or the Network Advertising Initiative (NAI), both of which maintain websites where people can opt out of interest-based advertising from their members. To opt out of website interest-based advertising provided by each organization’s respective participating companies, visit the DAA’s opt-out portal available at <http://optout.aboutads.info/>; the DAA of Canada’s opt-out portal available at <https://youradchoices.ca/en/tools>; or the NAI’s opt-out portal available at <http://optout.networkadvertising.org/?c=1>. Residents of the EEA may opt out of online behavioral advertising served by the European Interactive Digital Advertising Alliance’s participating member organizations by visiting <https://www.youronlinechoices.eu/>.

- I) **Analytics.** We employ analytics Cookies to collect information about how you interact with the Site, such as which pages you visit or videos you watch. This data helps us understand user behavior and personalize your online experience.

An example of analytics Cookies that we use includes Google Analytics, which is a web analysis service provided by Google Inc. (“Google”), to collect and analyze information about your use of the Site, which your web browser automatically sends to Google. This information includes the URLs of the websites that you visit and your IP address. Google may also set Cookies (which are third-party Cookies) or read preexisting Cookies. This information is stored on Google’s servers. Google uses this information to provide us with reports about Site traffic and your visits to the Site. We will use this data to improve the Site’s structure and content and improve our marketing capabilities. Google may use this data in accordance with its privacy policy, which is located at <http://www.google.com/policies/privacy>. For more information on how Google uses data collected through Google Analytics, please visit <http://www.google.com/policies/privacy/partners>. You may

opt out of our use of Google Analytics by visiting the Google Analytics opt-out website at <http://tools.google.com/dlpage/gaoptout> and installing the Google Analytics Opt-Out Browser Add-On. Please remember that you will need to opt out for each browser you use.

- J) **Targeted Advertising.** We may use information collected on the Site to deliver advertisements on our behalf or on behalf of other companies, targeted to your interests and preferences, on the Site or on other websites or applications you may visit on your various devices, or on your social media feed, and to gauge their effectiveness. Even if you disable tracking, keep in mind that you may still receive interest-based advertising, including from third parties with whom your information had been previously disclosed and that you may still receive advertising from third parties, though such advertising may not be based on your interests and preferences.

Examples of the trackers we employ include:

- i. **Google DoubleClick.** The Site uses the online marketing tool DoubleClick by Google. DoubleClick uses Cookies to show advertisements that are relevant to the user, to improve reporting on campaign performance, and to avoid showing ads the user has already seen. Using a Cookie ID, Google tracks which advertisements are shown in which browser, allowing them to prevent them from being shown repeatedly. Moreover, DoubleClick can use Cookie IDs to track conversions relating to advertisement requests. This is the case, for instance, when a user sees a DoubleClick advertisement and then later uses the same browser to visit the website of the advertiser and buys something there. According to Google, DoubleClick Cookies contain no Personal Information. However, if you are registered with a Google service, Google can associate the visit with your account. Even if you are not registered with Google or you have not logged in, the provider may come to know and store your IP address.
- ii. **Microsoft Ads.** The Site uses Microsoft Ads to serve more personalized ads to you. Microsoft may collect or receive Personal Information about you through the use of Cookies on the Site. For more information about Microsoft's privacy practices, please see the Microsoft Privacy Statement, available at <https://privacy.microsoft.com/en-us/privacystatement>. You can opt out of Microsoft Ads by visiting: <https://about.ads.microsoft.com/en-us/resources/policies/personalized-ads>.

5. HOW WE USE YOUR PERSONAL INFORMATION. We use your Personal Information in compliance with applicable laws. We use your Personal Information as was stated (or obvious) at the point of collection. We also use your Personal Information in the following ways:

- A) To respond to your questions, comments, or complaints, including to respond to questions posed through the "Request Info" or the "Request a Quote" page;
- B) To create and manage your Account;
- C) To access, manage, and use our Social Media pages;
- D) To review and evaluate applicants for employment, including to follow up with references provided to us;
- E) To promote trade shows;

- F) To facilitate transactions;
- G) To send you promotions or other communications;
- H) To troubleshoot problems with the Site;
- I) To improve the content and functionality of the Site and the services we provide to our customers;
- J) To perform statistical analysis and other analyses of the Site;
- K) To provide visuals and promote our goods and other services sold on the Site;
- L) To notify you of new services, new features of the Site, changes to the [Terms of Use](#) or this Privacy Policy, or other similar communications;
- M) To address and respond to DMCA (defined below) claims and counterclaims;
- N) To protect our legal rights or interests, or those of third parties, including to bring a legal action against you or anyone who may be causing harm to us, the Site, or to other users of the Site; and
- O) As requested by or consented to by you.

6. WHO WE SHARE YOUR PERSONAL INFORMATION WITH. We do not sell, rent, or loan your Personal Information to any third party. We limit the parties with whom we share your Personal Information. We may share your Personal Information with the following parties:

- A) **Employees and Affiliates.** Our employees and affiliates who have a need to know the information for our business purposes.
- B) **Third-Party Service Providers.** We may share your Personal Information with our third-party service providers and our representatives that provide certain services for ORBIS, with whom we have contracted. For example, we share your Personal Information with our third-party service providers that host and manage the Site or that provide services through the Site. We share your Personal Information with our third-party service providers to: (i) provide targeted advertising and other marketing; (ii) improve the content and functionality of the Site; (iii) perform data analysis and statistical analysis; (iv) help us with our marketing efforts; (v) help manage, administer, and fulfill sales; (vi) troubleshoot problems with the Site; and (vii) administer the job application process.
- C) **Government Officials / Law Enforcement.** We will cooperate with law enforcement and other governmental agencies, including by disclosing your Personal Information, if you are suspected of violating applicable laws. We may disclose your Personal Information to governmental officials, law enforcement, or other similar governmental personnel: (i) if we believe in good faith we are legally required to disclose that Personal Information; (ii) if we are advised to disclose your Personal Information by our legal counsel; or (iii) when necessary to identify, contact, or bring a legal action against someone who may cause or be causing harm to, or may be or is interfering with the legal rights of, ORBIS or any other party.

- D) **Professional Advisors.** We may share your Personal Information with our professional advisors, such as our attorneys, accountants, financial advisors, and business advisors, in their capacity as advisors to ORBIS.
- E) **Other Users.** By submitting a copyright infringement notice, counter-notice, or other similar notification through the Site or to ORBIS, you consent to having that communication forwarded to any person or entity to whom the notice or counter-notice relates to in order to facilitate a prompt resolution of the copyright infringement claim. Copyright infringement notices and/or counter-notices from you will be treated in accordance with our Digital Millennium Copyright Act (“DMCA”) Policy found at <https://docs.orbiscorporation.com/dmcapolicy>. This Section is only applicable to you if you are located in the United States.
- F) **Change in Ownership.** In the event ORBIS is the subject of a change of control transaction such as a merger, acquisition, sale of all or substantially all of our assets or equity, in the event the Site changes ownership, in whole or in part, or in the event of a bankruptcy, receivership, or similar transaction, we may provide your Personal Information to the subsequent owner(s), including as part of the due diligence process.
- G) **Other.** We may share your Personal Information with third parties when explicitly requested by or consented to by you, or for the purposes for which you disclosed the Personal Information to us as indicated at the time and point of the disclosure (or as was obvious at the time and point of disclosure from the context of collection).
7. **USING AND SHARING NON-PERSONAL INFORMATION.** ORBIS may collect, use, share, transfer, and otherwise process information that is not reasonably identifiable to you, such as aggregated or anonymized information (“**Non-Personal Information**”), for any business purposes in its sole discretion, so long as such collection, use, sharing, transfer, and/or processing is in compliance with applicable laws.
8. **SECURITY.** ORBIS uses technical and organizational measures to ensure a level of security appropriate to the risk for all Personal Information processed. While we cannot guarantee that loss, misuse, or alteration to data will not occur, the Site has commercially reasonable security measures in place to help protect against the loss, misuse, and alteration of the information under our control. In the event that a breach into our security systems occurs and there is a possibility that an unauthorized person acquires your Personal Information, ORBIS will notify you of the breach as required under applicable law.

YOU UNDERSTAND THAT NO DATA TRANSMISSION OVER THE INTERNET OR A MOBILE DEVICE CAN BE GUARANTEED TO BE 100% SECURE. WHILE WE STRIVE TO PROTECT YOUR PERSONAL INFORMATION, WE DO NOT GUARANTEE THE SECURITY OF ANY PERSONAL INFORMATION AND YOU PROVIDE SUCH PERSONAL INFORMATION AT YOUR OWN RISK.

9. **SOCIAL MEDIA.** ORBIS is active on social media, including Facebook, Twitter or X, Instagram, YouTube, and LinkedIn (“**Social Media**”). You have the opportunity to comment on those Social Media platforms regarding ORBIS and the programs, goods, and services we offer. Any content you post on a Social Media platform is public information and will be treated as non-confidential information. ORBIS reserves the right to post (or re-post) on the Site and its Social Media pages any comments or content that you post on our Social Media pages. **YOU AGREE TO HOLD ORBIS**

AND ITS AFFILIATES HARMLESS AND WITHOUT LIABILITY FOR THE RESULTS OF ANY AND ALL CONTENT YOU POST TO ORBIS' SOCIAL MEDIA PAGES.

The Social Media platforms may require us to implement Cookies, plug-ins, and/or application protocol interfaces (APIs) provided by those Social Media platforms to facilitate those communications and features. Your use of Social Media platforms and the collection, use, and sharing of Personal Information by such platforms is governed by the privacy policies and terms of the third parties that own and operate those sites and NOT by this Privacy Policy. We encourage you to review the privacy policies of those third-party Social Media platforms.

- 10. THIRD-PARTY SITES.** The Site may link to, or be linked to, other websites not maintained by or related to ORBIS, such as the Social Media “Connect with Us” links at the bottom of the homepage of the Site. ORBIS is not responsible for the privacy practices of any third parties or third-party websites, including those linked on the Site. To the extent that you disclose Personal Information to any third parties or through any third-party websites, the privacy policies and terms of those third parties, and not this Privacy Policy, apply to the use of your Personal Information. We are not responsible for any information that you provide to third-party websites.
- 11. COMMUNICATING WITH YOU.** ORBIS may use your Personal Information to send you email or direct mail information about ORBIS or the goods or services we offer. You may opt out of receiving certain email promotions from us by clicking the “unsubscribe” link in the email you received, or by contacting us at info@orbiscorporation.com. To opt out of direct mailing, you may contact us as info@orbiscorporation.com.
- 12. CONSENT TO PROCESSING IN THE UNITED STATES.** By providing Personal Information to us, you understand and consent to the collection and processing of your Personal Information in the United States, regardless that certain governmental authorities may not consider the level of protection of Personal Information in the United States to be equivalent to that required by the EEA or other jurisdictions. Certain EEA authorities have determined that the United States does not provide an “adequate” level of protection for the processing of Personal Information. EEA residents can find more information about the additional protections taken for such transfers in Section 15(L).
- 13. GOVERNING LAW; VENUE.** Unless otherwise required by the applicable law of your country of residence, this Privacy Policy is governed by the laws of the State of Wisconsin, United States, without regard to conflict of laws principles. Venue is exclusively in Waukesha County, Wisconsin with respect to any dispute arising under this Privacy Policy.
- 14. CONTACTING US.** If you have any questions or concerns regarding this Privacy Policy or the manner in which we or our service providers treat your Personal Information, please contact us as follows:

ORBIS Corporation
Attn: Marketing Communications
1055 Corporate Center Drive
Oconomowoc, WI 53066
(800) 890-7292
info@orbiscorporation.com

15. TERMS APPLICABLE TO PERSONS LOCATED IN THE EEA. The purpose of this Section is to provide information and additional terms that apply regarding ORBIS' processing of personal data of persons located in the EEA in accordance with the EU General Data Protection Regulation 2016/679 ("GDPR") and the ePrivacy Directive 2002/58/EC. **THIS SECTION ONLY APPLIES TO YOU IF YOU ARE LOCATED IN THE EEA.**

In the event of a conflict between this Section and the remainder of this Privacy Policy, this Section will control for those persons located in the EEA.

A) **Definitions.** The terms "personal data" and "processing" have the same meanings set forth under GDPR. Those definitions are below for your convenience.

- i. **"personal data"** means any information relating to an identified or identifiable natural person ("**data subject**"); an identifiable natural person is one who can be identified, directly or indirectly, in particular 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.
- ii. **"processing"** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Furthermore, as used in this Section, the following definition applies:

- iii. **"Automated Decision"** means an automated decision made about an individual person, including profiling, often where meaningful logic is involved, that produces legal effects that significantly affects the involved individual.

B) **Data Controller.** ORBIS is responsible for, and is the data controller of, your personal data that it receives through the Site.

C) **Processing of Personal Data.** Personal Information is considered personal data under the GDPR. Furthermore, if any Non-Personal Information also qualifies as personal data under the GDPR, then it will be considered and treated as *personal data* for those persons located in the EEA.

D) **Legal Basis for Processing.** When ORBIS processes your personal data, it has a legal basis for doing so as required under the GDPR. ORBIS will only process your personal data if: (i) it has received your express opt-in consent for such processing; (ii) the processing is necessary for performance of a contract or to enter into a contract; (iii) the processing is necessary for a legal obligation to which ORBIS is subject; (iv) the processing is necessary to protect the vital interests of the data subject; (v) the processing is necessary for a task carried out in the public interest; or (vi) ORBIS or a third party has a legitimate interest that is not overridden by the interests or fundamental rights and freedoms of the data subject.

We have set out in the table below the reasons why we process personal data, the associated legal basis for ORBIS' processing of such personal data, and the type of personal data. If ORBIS is required to process any personal data for reasons (iii), (iv) or (v) above, those reasons may not be known to ORBIS today and therefore may not be listed below.

ORBIS' Purpose for Processing	Legal Basis for Processing	Category of Personal Data (see details provided above for more information)
When you register and maintain an ORBIS Access Account: to register and manage your Account and allow you to track the status of your orders.	Consent, Contract, Legitimate Interest	<i>Personal data</i> (contact information; business contact information)
When you request information or provide information through the Site, over the phone, through the mail, or through email: to address or respond to your requests, questions, or concerns; when you sign up to receive emails or promotions; customer and technical support, or other similar activities.	Consent (if collected online), Contract, Legitimate Interest	<i>Personal data</i> (contact information)
When you apply for employment: to consider applications for employment; to conduct employment-related due diligence, such as contacting references.	Consent (for special categories of personal data), Contract, Legitimate Interest	<i>Personal data</i> (contact information; employment related information)
Purchases: to sell and fulfill any order you place directly with ORBIS, including to manage shipping, collections, returns, and order fulfillment.	Consent, Contract	<i>Personal data</i> (business contact information; payment information)
Trade Shows: to directly market goods and/or services that may be of interest to you.	Consent, Legitimate Interest	<i>Personal Data</i> (contact information)
Site Administration: to administer the Site (for example, troubleshooting, system maintenance, respond to DMCA requests, and data analysis); and prevent fraud.	Legitimate Interest	<i>Personal Data</i> (contact information; Cookies)
Analytics and Marketing: to analyze and improve the Site and features of the Site and content on	Legitimate Interest	<i>Personal Data</i> (contact information; Cookies)

the Site; to provide direct marketing to you about our goods, services, and the Site.		
Social Media: to engage with our customers, prospective customers, and the community about our goods, service, and/or brand; and if required, take actions to maintain the quality of the brand in the market.	Legitimate Interest	<i>Personal Data</i> (contact information; Cookies)

- E) **Right to Withdraw Consent.** In the event you provide your consent for us to process your personal data, you may withdraw your consent at any time by emailing info@orbiscorporation.com to request such change at no additional cost.
- F) **Marketing.** ORBIS does not automatically collect and process personal data through the use of Cookies for the purpose of marketing without first obtaining your express, opt-in consent. For information you provide directly to us in the context of a purchase or inquiry about potential products, we may use your personal data to market our goods and services to you, subject to applicable law and your right to opt out of such marketing. **YOU HAVE THE RIGHT TO OBJECT TO THE PROCESSING OF PERSONAL DATA FOR MARKETING PURPOSES AT ANY TIME BY CONTACTING US AT INFO@ORBISCORPORATION.COM OR BY CLICKING THE UNSUBSCRIBE LINK IN ANY MARKETING EMAILS.**
- G) **Data Collected from Third-Party Sources.** We sometimes collect personal data from third-party sources and not the data subject themselves. For example, we receive personal data about third parties when job applicants provide references. We only use employment reference information for the purpose of employment verification.
- H) **Your Rights and Choices.** The GDPR provides certain rights to individuals in relation to that individual's personal data. Accordingly, you may have the following rights under the GDPR, although some exceptions apply. We will comply with any requests made relating to the following rights if required by applicable law. We may require you to prove your identity before we modify, provide, delete, or transfer your personal data.
- i. **Right of Access** — You have the right to be informed of and require that we provide you a copy of the personal data we process about you.
 - ii. **Right to Rectification** — You have the right to request that we amend or update inaccurate or incomplete personal data.
 - iii. **Right to Erasure (Deletion)** — Under certain circumstances, you have the right to request deletion of your personal data.
 - iv. **Right to Restrict** — Under certain circumstances, you have the right to request that we temporarily or permanently stop processing all or some of your personal data.

- v. **Right to Object** — Under certain circumstances, you have the right to object to ORBIS processing personal data, such as for direct marketing purposes or when Automated Decision making is used.
- vi. **Right to Data Portability** — You have the right to request a copy of your personal data in electronic format and further request that we send such personal data to another party.
- vii. **Communication Preferences and Opt-Outs** — You have the right to stop receiving communications from us at any time by contacting info@orbiscorporation.com, at no additional cost.
- viii. **Right to Lodge a Complaint** — You have the right to lodge a complaint with the applicable supervisory authority. Although you are not legally required to do so, we ask that you first contact us so we can make reasonable efforts to address your complaint.

If you have any questions about your privacy, your rights and choices, or how to exercise them, please contact us with your request at info@orbiscorporation.com. We will respond to your request within a reasonable period of time.

- I) **Providing Personal Data Due to a Contractual Requirement.** You must provide personal data necessary to enter into certain agreements with ORBIS, such as in certain employment circumstances and in order to purchase products from ORBIS.
- J) **The Consequences of Not Providing Personal Data.** ORBIS will not be able to provide certain services to you without processing certain personal data such as processing job applications or selling products. Furthermore, if you turn off certain tracking devices or decline certain Cookies on the Site, certain features of the Site may not work.
- K) **Data Retention.** ORBIS will only keep your personal data for so long as it has a business purpose for doing so. However, we may retain your personal data for such longer purposes as necessary to comply with legal obligations, or as necessary to pursue or defend against claims, or to enforce ORBIS' contractual rights. The criteria used to determine our retention periods include:
 - The length of time we have an ongoing relationship with you and provide goods or services to you (for example, for as long as you have an account with us or continue using our services);
 - Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions or communications for a certain period of time before we can delete them); and/or
 - Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).
- L) **Transfer to Third Parties and Countries.** Personal data that we collect or receive may be transferred to and/or processed by third parties that are located outside of the EEA, some of which EEA authorities may not consider to have an adequate level of protection for personal data. ORBIS will only transfer EEA data subject's personal data to third parties located outside of the EEA when it has ensured appropriate safeguards for such personal data, such as through use of the standard contractual clauses (or its successor contract).

Furthermore, ORBIS' German and Belgium affiliates (ORBIS GmbH and ORBIS NV, respectively) transfer EEA personal data to certain of ORBIS' United States affiliates (ORBIS Corporation and Menasha Corporation). The United States is not considered as having an adequate level of protection for personal data by EEA data protection authorities. However, ORBIS has ensured appropriate safeguards for those transfers of EEA personal data by the execution of the standard contractual clauses between the relevant parties.

You may request a copy (which may be provided as a summary) of any such appropriate safeguards or seek inquiries regarding such safeguards by contacting us info@orbiscorporation.com. We will respond to your request or inquiry within a reasonable period of time.

16. TERMS APPLICABLE ONLY TO RESIDENTS OF MEXICO. This Section provides additional terms and information that apply only to residents of Mexico pursuant to the Federal Law on Protection of Personal Data in the Possession of Private Parties (Ley Federal de Protección de Datos Personales en Posesión de Particulares) (“LPPD”), and only to the extent that the LPPD applies to ORBIS. “**Personal Data**” has the meaning set forth in the LPPD.

A) **When We Share Your Personal Information with Third Parties.** We will only disclose your Personal Data to third parties without requiring your consent pursuant to Article 37 of the LPPD.

B) **How To Access, Rectify, Cancel, and Object to the Use of Your Personal Data.**

- i. **ARCO Rights** — You have the right to know the type of Personal Data collected, and the purposes and conditions for which it was collected and used (Access).

You have the right to request correction or clarification of your Personal Data, if the information is outdated, incomplete, or incorrect (Rectification).

You have the right to request that we delete your Personal Data if the Personal Data is not being used according to guidelines, duties, and obligations, as stated under the LPPD (Cancellation).

You have the right to oppose the use of your Personal Data for specific purposes permitted by the LPPD (Objection).

Collectively, your rights of Access, Rectification, Cancellation, and Objection are known as your “**ARCO Rights**.”

- ii. **Exercising ARCO Rights** — In order to exercise any of the ARCO Rights, you must submit the request through an email addressed to the email address in [Section 14](#). In accordance with Article 29 of the LPPD, the request must contain information requested on all required fields and marked as mandatory, including: complete name (including last name(s)), email address or postal address for notifications, a contact telephone number, and a clear and exact description of the Personal Data for which ARCO Rights are being exercised. The form should be accompanied by a copy of an official form of identification or be included in a legible electronic file (scanned). We will make

reasonable efforts to reply to your notice within twenty (20) working days of receiving your request, and we will respond by email to the address the request came from.

- iii. **Revocation of Consent** — You may revoke your consent, which you may have granted us, for the managing of your Personal Data. However, we cannot comply with such request in all cases, or stop using the information immediately, and due to a legal obligation, we may continue managing your Personal Data. Likewise, we ask that you please consider that for certain purposes, revocation of consent would mean we are not able to continue providing you with requested services, or it might also imply an end to your relationship with us.

- C) **Improper Use of Your Personal Data.** If you think that your right to protection of your Personal Data is improperly used in violation of the LPPD, you may reach out to Mexico's IFAI with an official complaint. For more information, please visit their website at www.ifai.org.mx.

- 17. TERMS APPLICABLE ONLY TO RESIDENTS OF CANADA.** This Section provides additional terms and information that apply **only** to residents of Canada. “**Personal Information**” means information about an identified or identifiable individual and includes Non-Personal Information where such information can be linked to an individual either alone or in combination with other information (such as information contained in Cookies).

- A) **Legal Disclosures and Lawful Requests.** In addition to the disclosures outlined above in this Privacy Policy, we and our Canadian, US, and other foreign service providers and affiliates may disclose your Personal Information in response to a search warrant or other legally valid inquiry or order, to another organization for the purposes of investigating a breach of an agreement or contravention of law, or for purposes of detecting, suppressing, or preventing fraud, or as otherwise may be required or permitted by applicable Canadian, US, or other law or legal process, which may include lawful access by US or foreign courts, law enforcement, or other government authorities. Your Personal Information may also be disclosed where necessary for the establishment, exercise, or defense of legal claims and to investigate or prevent actual or suspected loss or harm to persons or property.
- B) **Access.** Subject to limited exceptions under applicable law, you have the right to request access to, updates to, and corrections of inaccuracies in your Personal Information in our custody and control. You may exercise these rights by emailing or writing to us at the applicable address in [Section 14](#). We may request certain Personal Information for the purpose of verifying the identity of the individual seeking access to his or her Personal Information records. We may, unless otherwise prohibited by applicable law, charge a reasonable fee for granting you access to your Personal Information.
- C) **Your Choices.** You can opt out of receiving marketing communications from us by doing one of the following:
- If you received a marketing email, follow the opt-out or “unsubscribe” instructions provided in your email. Please note that you may continue to receive certain transactional and account-related communications from us.
 - Contact us at the contact information noted in [Section 14](#).

D) **Data Collected from Third-Party Sources.** We sometimes collect Personal Information from third-party sources. For example, we receive Personal Information about third parties when job applicants provide references. We only use employment reference information for the purpose of employment verification.

18. TERMS APPLICABLE ONLY TO RESIDENTS OF CALIFORNIA. This Section provides additional terms and information that apply only to residents of California.

A) **Information Sold or Shared in Preceding 12 Months.** Under California law, sharing Personal Information with partners in exchange for some benefit, such as providing more relevant ads, is considered a “sale” or “share.” In the preceding 12 months, depending on your interactions with us, we may have “sold” or “shared” the following categories of personal information:

Category of Personal Information	Business or Commercial Purpose	Categories of Third Parties to Whom Personal Information was Disclosed for a Business Purpose	Disclosures of Personal Information That May be Considered a “Sharing” or “Sale” under California Law
Identifiers and payment information , such as name, address, email address, and any details relating to your payment for goods or services	<ul style="list-style-type: none"> To provide your information to wholesalers or distributors in response to your request To perform Site analytics and standard business functions, such as preventing fraud 	<ul style="list-style-type: none"> Service providers, such as Site analytics companies, network security vendors, wholesalers, and distributors Professional services organizations, such as auditors, accountants, and law firms 	N/A
Electronic information collected automatically , such as your type of browser, operating system, search requests, website traffic information, the date and time you visited the Site, the amount of time you	<ul style="list-style-type: none"> To perform Site analytics and standard business functions, such as preventing fraud To provide you with personalized advertising and content 	<ul style="list-style-type: none"> Corporate affiliates Service providers 	<ul style="list-style-type: none"> Corporate affiliates Service providers

used the Site, the pages you visited on the Site, any device you are using to access the Site, and any hyperlinks you click on when using the Site			
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B) **Your Rights and Choices.** California residents may exercise the rights described in this Section. Please note that some of the rights may vary depending on your country, province, or state of residence.

- i) **Right to Know** — You have the right to request to know the categories of Personal Information we have collected about you, the sources of that Personal Information, the business purpose for collecting or selling Personal Information, the categories of third parties to whom information is shared or sold, and the specific pieces of Personal Information we have collected about you.
- ii) **Right To Delete** — You have the right to request that we delete any of your Personal Information that we collect, subject to certain exceptions.
- iii) **Right to Correct** — You have the right to request correction of inaccurate Personal Information that we maintain about you or update the information we have on file.
- iv) **Right to Opt-Out of Sale or Sharing** — California consumers have the right to opt out of the “sale” or “sharing” of their Personal Information. See Section 18(C) for additional information.
- v) **Right to Non-Discrimination** — You have the right to be protected from discrimination for exercising your rights under California law. We will not discriminate against you for exercising your rights under the California law.

C) **Right to Opt Out of Cookies and Sale/Sharing Using Online Tracking Technologies.** As discussed above, we do not sell your Personal Information for monetary consideration. However, there may be instances where we disclose your Personal Information to, or share your Personal Information with, a third party for other valuable consideration. When we refer to “sell,” “selling,” “sale,” or “sold” in this Privacy Policy, we are referring to disclosure or sharing of Personal Information for valuable consideration other than money.

D) **Exercising Your Rights.** To exercise your rights as set out above, please contact us by:

- calling (800) 890-7292;
- emailing us at info@orbiscorporation.com; or

- using our cookie consent manager to change which information is collected through the Site.

Depending on the sensitivity of your request, you may be required to provide additional information to verify your identity and request before further action is taken. If your request is for access to your Personal Information, we will confirm your email and one or more additional pieces of information provided in your request to verify against information already in our possession, such as name and state or country of residence. If we are unable to confirm that the data provided in your request matches our records, we will ask for additional information to verify your identity.

Your authorized agent may make a request on your behalf. We will consider any evidence the agent submits to demonstrate that you gave the agent signed permission to submit the request. We may email you to confirm that the agent is indeed acting on your behalf.

- E) **Global Privacy Controls.** ORBIS only collects your Personal Information automatically through the Site with your express consent. As such, ORBIS Corporation does not honor “Do Not Track” signals (also called Global Privacy Control signals) sent from your browser.
- F) **Responding to Requests.** Within 10 days of receiving your request to delete, request, or know, we will confirm receipt of the request and provide information about how we will process the request. Generally, we will respond to your request within 45 days. If we need more time to respond, we will provide you with notice and an explanation of the reason we need more time to respond. We may deny your request if we cannot verify your identity or are legally permitted to deny the request, such as if doing so proves impossible or would involve disproportionate effort, or if the requested information would contain confidential or proprietary information. If we deny your request, we will explain the basis for the denial, provide or delete any Personal Information that is not subject to the denial, and refrain from using the Personal Information retained for any purpose other than permitted by the denial. We will maintain a record of your request and our response for 24 months. To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request.