

PRIVACY POLICY

Last Updated: September 4, 2024

Ascent Industries Co. and its affiliates and subsidiaries (collectively “**Ascent Industries**”, “**we**”, “**us**”, or “**our**”) takes data privacy and security seriously. This Privacy Policy (“**Privacy Policy**”) describes how we collect, use, share, and/or disclose information that we collect from individuals who visit our Sites, use our Services, or otherwise engage with us as described below (such individuals are collectively referred as “**user**”, “**you**”, or “**your**”).

PLEASE READ THIS PRIVACY POLICY CAREFULLY TO UNDERSTAND OUR POLICIES AND PRACTICES REGARDING YOUR INFORMATION. IF YOU DO NOT AGREE WITH THE TERMS OF THIS PRIVACY POLICY, YOU SHOULD NOT USE OUR SITES, SERVICES, OR OTHERWISE INTERACT WITH US. BY ACCESSING, VISITING, BROWSING, OR USING OUR SITES, REGISTERING OR SUBMITTING YOUR INFORMATION THROUGH OUR SERVICES, OR INTERACTING WITH US, YOU AGREE TO THE PRACTICES, TERMS, AND CONDITIONS DESCRIBED IN THIS PRIVACY POLICY. THIS PRIVACY POLICY MAY CHANGE FROM TIME TO TIME. YOUR CONTINUED USE OF YOUR SITES AFTER WE MAKE CHANGES IS DEEMED ACCEPTANCE OF THOSE CHANGES, SO PLEASE CHECK THE PRIVACY POLICY PERIODICALLY FOR UPDATES.

THE SITES ARE INTENDED FOR USERS LOCATED IN THE UNITED STATES AND ARE NOT INTENDED FOR USERS LOCATED IN ANY OTHER COUNTRIES, INCLUDING THE EUROPEAN UNION AND THE EUROPEAN ECONOMIC AREA.

1. INTRODUCTION AND SCOPE

This Privacy Policy applies to information we collect through:

- Our “**Sites**” which refers to www.ascentco.com, www.ascentchem.com, www.ascenttubular.com, and any other websites, mobile applications, platforms, or other online solutions, software applications, media, features, subdomains, content, and/or functionality made available by us containing a link to this Privacy Policy.
- Our “**Services**” which refers to the products available on or through the Sites and any other services available via the Sites. Our general interactions with you, including, when you request information or make general inquiries to us, interact with us via business-to-business contacts, request or receive our marketing information, or engage with us through our social media pages.

We may de-identify, aggregate, and/or anonymize your information by excluding and removing data components (such as your name, email address, or linkable tracking ID) through obfuscation, or through other means so that the resulting data set is no longer personally identifiable to you (such resulting data set is known as “**Aggregated Data**”). Our use of Aggregated Data is not subject to this Privacy Policy.

2. INFORMATION WE MAY COLLECT

The information we collect depends upon things such as the nature of our relationship, the method you communicate with us, and the purpose of your interaction with us. We may collect the following information directly from you, from third-party sources, and/or automatically as you use our Sites and Services:

- **Contact Information:** Such as your name, email address, mailing address, telephone number, professional title, and/or business name.
- **Communications Data:** Such as information you provide through our online web forms when you contact us with questions, feedback, surveys, engage with us for customer support or customer service-related requests, or otherwise choose to provide to us when you correspond with us online.
- **Cookies and Similar Technologies:** We use cookies, pixels, and similar technologies as described in the “Cookies and Similar Technologies” section of this Policy. If you choose to disable cookies and similar technologies, some areas and features of the Site may not work properly. Where required by law, we rely on your express opt-in consent for the use of marketing, performance, and analytic cookies and similar technologies.
- **Usage Data:** Such as information about how you use our Sites and interact with us, including information you provide when you use any interactive features of the Sites or our services, the URL that referred to you our Sites, the areas within our Sites that you viewed and your activities there, domain name, a date/time stamp, Internet service provider (ISP), operating system, IP address, clickstream data, and similar device and usage information.
- **Geolocation Information:** This may include the IP address or other location information transmitted by a mobile or other device (depending upon your settings) when you interact with the Sites.
- **Device Information:** Such as information that is automatically assigned to your devices used to access our Sites, including IP address, unique device identifier, device type, browser type, location information, and other information about your browser.
- **Social Media Information:** Such as your name, username, or other profile information in connection with your social media account that we may collect if you connect with us through a third-party social media network or other websites, such as Facebook, Instagram, Twitter, or LinkedIn.
- Other information that you voluntarily share with us to facilitate your use of our Sites and Services which is not specifically listed here. We will use such data in accordance with this Privacy Policy, as otherwise disclosed at the time of collection, in accordance with our agreement, or to the extent necessary for performing the services.

We may also collect information about you from additional online and offline sources, including our affiliates, subsidiaries, and other third-party sources as permitted by law. Please note that the entry of personal information may be required to access certain portions of our Sites and Services. You may choose not to provide us with any personal information and may still access certain portions of our Sites. However, you may not be able to fully utilize all functionalities and features of our Sites and services if certain categories of personal information are required in order for us to deliver those functionalities.

3. HOW WE MAY USE YOUR INFORMATION

We may use the information described above, including any personal information, in connection with the following business or commercial purposes or otherwise to the extent permitted by law:

- **Providing Our Products and Services:** We use your information to provide our products and

services, which includes, to present, maintain, and/or modify our Sites and Services, to perform our contractual obligations to our customers, to complete the transaction for which we collected the personal information, to verify your identity, process transactions, communicate with you about our products and services, or otherwise provide you with our Services.

- **Security and Fraud Prevention:** We use your information for security and fraud prevention purposes, which includes to protect, investigate, mitigate, and deter against fraudulent, malicious, unauthorized, infringing, or illegal activity relating to our Sites, Services, products, or to monitor and ensure the safety and security of our premises, property, employees, customers, and visitors.
- **Advertising and Marketing:** We may use your information for marketing and advertising purposes, which includes direct marketing and promotional purposes, posting ads through our third-party websites or mobile applications that may be of interest to you, contacting you with advertisements, promotions, or offers that may be of interest to you (as permitted by law and consistent with any marketing preferences that we offer and you have registered with us).
- **Operating Our Business:** We use your information to operate our business which includes to facilitate and service our business, including the creation of new products or services, conduct data analytics, surveys, benchmarking, maintain accounting records, analyze financial results, comply with internal audit requirements, managing risk, obtaining professional advice, and create Aggregated Data and developing industry and sector-wide reports, to better understand our customers, visitors to our Sites, to comply with any contractual obligations, to comply with your instructions or requests, manage our relationships with you, improve our Services, and otherwise facilitate the operation of our Services.
- **Communicating With You:** We may use your information to communicate with you, such as to contact you directly by mail, telephone, email, SMS, or other electronic messaging service to in order to respond and provide the appropriate assistance to you; to extend offers of goods and services or information that may be of interest to you; to keep records of our communications with you; to determine user interests; for usage analytics purposes; and to administer a promotion, survey, or other customer engagement features.
- **Corporate Activities.** We may use your information in connection with evaluating, conducting, or implementing a merger, divestiture, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of a bankruptcy, liquidation, or other proceeding in which personal information held by us is among the assets transferred.
- **Legal Requirements:** We may use your information to satisfy legal requirements which includes to enforce our terms and conditions or protect our business or our customers, and to comply with our contractual and legal obligations, such as complying with national security or law enforcement requirements, discovery requests, or where otherwise required or permitted by applicable laws, court orders or regulatory authorities, or to establish, exercise, or defend legal claims, whether in court, administrative, or other proceedings, including disputing a claim or recovering a debt; and
- As otherwise set forth in this Privacy Policy, to fulfill the purpose or reason you provided the information, and/or with your consent such as when required by law.

4. **HOW WE MAY DISCLOSE YOUR INFORMATION**

When permitted by applicable law, including in cases that require your consent, we may disclose Personal Information that we collect or you provide as described in this Privacy Policy in the following contexts:

- **Corporate Affiliates**, which include, our subsidiaries, divisions, affiliates, and holding companies for various purposes permitted by law, including the advertising and marketing of their products and services to you.
- **Service Providers**, which include contractors, service providers and other third parties we use to support our business and deliver products or services to you, and/or who perform functions on our behalf such as customer service, data analysis, servicing accounts, marketing, and/or development of our products and services, and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- **Acquisitions or Similar Transactions**, which include to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by us is among the assets transferred.
- **With Your Consent or at Your Direction**, which includes to third parties to market their products or services to you if you have consented to these disclosures or where you have consented to the disclosure of your information to other unaffiliated third parties who are not described elsewhere in this Privacy Policy.
- **In Response to Legal Process or Defending Legal Claims**, which includes, as required by law, court orders, subpoena, or other legal process or if we reasonably believe such action is necessary to comply with the law and the reasonable requests of regulators, law enforcement, or other public authorities or quasi-government authorities, including fraud detection agencies. We may also disclose the information to establish, protect, or exercise our legal rights, to enforce our terms and conditions or other legal agreements, to defend against a legal claim, to detect, investigate, prevent, or take action against illegal activities or potential threats to the rights, property, or safety of any other person, or as required by law.
- **Professional Advisors**, which includes our attorneys, accountants, tax advisors, investment advisors, and other fiduciaries or consultants that need access to your information to provide operational or other support on your behalf.
- **Third Parties**: We may provide personal information about you to third parties that may offer services specifically requested by you.
- **De-Identified or Aggregated Data**. We may disclose anonymous, de-identified, or Aggregated Data that does not identify any specific individual, such as groupings of demographic data and customer preferences, (i) for compliance with reporting obligations; (ii) for business or marketing purposes; and (iii) to assist us and others in understanding our users' interests, habits, and usage patterns for certain programs, content, services, marketing, and/or functionality.

5. **DATA RETENTION**

We retain and use your personal information for an appropriate period of time as is necessary to fulfill the purposes for which it was collected, to comply with our business requirements and legal obligations, to resolve disputes, to protect our assets, to provide our services, to pursue legitimate business purposes, to enforce our agreements, and other business purposes to the extent provided in this Privacy Policy.

We take reasonable steps to delete the personal information we collect when (1) we have a legal obligation to do so, (2) we no longer have a purpose for retaining the information, or (3) if you ask us to delete your

personal information, *unless* we determine that doing so would violate our existing, legitimate legal, regulatory, dispute resolution, contractual, or similar obligations. We may also decide to delete your personal information if we believe it is incomplete, inaccurate, or that our continued storage of your personal information is contrary to our legal obligations or business objectives. When we delete your personal information, it will be removed from our active servers and databases; but it may remain in our archives when it is not practical or possible to delete it.

6. DATA SECURITY

We recognize the importance of safeguarding your personal information. We endeavor to maintain reasonable and appropriate physical, technical, and organizational safeguards designed to protect your personal information from accidental loss and unauthorized access, use, alteration, or disclosure. From time to time, we review our security procedures to consider appropriate new technologies and methods. We use reasonable security measures when transmitting personal information to customers in responding to requests under applicable data protection or privacy laws.

While our security measures seek to protect the personal information in our possession, no security system is perfect, and no data transmission is 100% secure. Although we do our best to protect your personal information, we cannot guarantee or warrant the security of your personal information transmitted to or from our Sites. The safety and security of your personal information also depends on you. Where you use a password for access to restricted parts of our Sites or our Services, you are responsible for keeping your password confidential. Do not share your password with anyone. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Sites.

7. COOKIES AND SIMILAR TECHNOLOGIES

Cookies

A “cookie” is a small file created by a web server that can be stored on your device (if you allow) for use either during a particular browsing session (a “session” cookie) or a future browsing session (a “persistent” or “permanent” cookie). “Session” cookies are temporarily stored on your device and only last until they expire at the end of your browsing session. “Persistent” or “permanent” cookies remain stored on your device until they expire or are deleted by you. Local stored objects (or “flash” cookies) are used to collect and store information about your preferences and navigation to, from, and on a website. First-party cookies are set by the website you are visiting and they can only be read by that site. Third-party cookies are set by a party other than that website.

Other Similar Technologies

In addition to cookies, there are other automatic data collection and tracking technologies, such as Internet tags, web beacons, pixels (clear gifs, pixel tags, and single-pixel gifs), and navigational data collection (log files, server logs, etc.) that can be used to collect data as you navigate through and interact with a website. For example, pixels are small images on a web page or in an email that collect information about your browser or device and can set cookies. Web beacons are tiny graphics with unique identifiers that are used to understand browsing activity. UTM codes are strings that can appear in a URL when you move from one web page or website to another. The string can represent information about your browsing, such as which advertisement, page, or publisher sent you to the receiving website.

What Cookies and Similar Technologies Do We Use and Why Do We Use Them?

We use certain cookies and similar technologies to operate the Sites, to measure and track how you interact with the Sites, to enable certain functions on the Sites, to ensure the privacy and security of the Sites, to enhance your experience, to understand the number of hits and range of devices and browsers used to view our Sites, to develop usage analytics, to enhance your experience, to honor your preferences and settings and provide you with a more personal experience, to provide interest-based advertising and marketing, when applicable, and to otherwise tailor our communications to you.

After visiting our Sites, you may see information about our services on unrelated websites. This may occur as a result of a placement of a cookie or other tracking technology from your past browsing. For example, our advertisers may display targeted advertisements when you visit third-party websites or social networks based on your previous interactions with our Sites as tracked by cookies and similar technologies. This process also helps us understand the effectiveness of our content and marketing efforts.

Some of our service providers may use cookies or other methods to gather information regarding your use of the Sites and may combine the information in these cookies with personal information about you that you may have provided or that they may have through permissible means. How and when a third party uses that tracking information depends on their privacy policy, which you should review.

The Sites may use the following categories of cookies:

Essential: Essential cookies are necessary for basic features and functionality of the Site. Without these essential cookies, the Site will not perform properly and we may not be able to provide you with certain services you have asked for, provide access to secure areas, and choices you have made for better functionality cannot be provided.

Functionality: Functionality cookies help us customize content on the Site based on your preferences. We use functionality cookies to remember choices you've made or information you've provided, such as your username or the region you are in. This allows us to tailor your experience on the Sites to your preferences. For example, authentication cookies are functionality cookies that are used for the duration of a session (or persistent, if you agree to the "remember me" function) to allow users to authenticate themselves on subsequent visits or gain access to authorized content across pages on the Sites.

Analytics and Performance: We use analytics and performance cookies collect information about how you use the Sites, including which pages you go to most often and if users receive error messages from certain pages in order to help us fix technical issues or errors and highlight areas where we can improve the Site. We also use these cookies to detect the most searched for words in search engines that lead to the Site. You may also encounter third-party analytics and performance cookies on our Sites which may gather browsing activity (such as information you have entered or choices you have made) across numerous websites that you visit and across numerous browsing sessions. These cookies also help improve how our Sites function and perform, customizes your interaction with our Sites, and helps provide more relevant messaging and marketing communications to you. We also use Google Analytics and other third-party analytics providers listed below to help measure how users interact with our Sites content. These cookies "remember" what our users have done on previous pages and how they've interacted with the website.

Advertising: Advertising cookies and other similar technologies are used by us to enable us to understand your interests and tailor marketing to you and your interests and provide you with a more personalized service. These cookies remember that you visited our Sites and we may share this information with third-parties, such as advertising platforms, so that we can show you relevant offers and direct personalized advertising to you. We may also use these cookies to target and re-target visitors to our Site with digital advertising that is most relevant to the user. These cookies are also used to limit the number of times you see an advertisement or particular content, as well as help measure the effectiveness of an

advertising or marketing campaign.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can read more about how companies use cookies to conduct targeted or retargeted advertising, and ways to opt-out of receiving targeted ads from members of the National Advertising Initiative ("NAI") on its website at: www.networkadvertising.org.

The Sites may also use particular third-party cookies or tracking technologies including, but not limited to, the following:

Google Analytics: We use Google Analytics to collect and process statistical data about the number of people using the Site and to better understand how they find and use the Site. The cookie installed by Google Analytics calculates visitor, session, and campaign data and also keeps track of usage for the Sites' analytics report. The data collected includes data related to your device/browser, your IP address, and on-site activities to measure and report statistics about user interactions. The cookie stores information anonymously and assigns a randomly generated number to recognize unique visitors. Any data collected by is used in accordance with this Policy and Google's Privacy Policy. You can learn more about Google's restrictions on data use by visiting the [Google Privacy Policy](#). You can learn more about Google's advertising services by visiting its [Technologies](#) page along with information on [Google Analytics](#). You can opt-out of Google's use of cookies or device identifiers by visiting [Google's Ads Settings](#). You can also opt-out of Google Analytics, by installing the [Google Analytics Opt-out Browser Add-on](#) feature. For more details, visit the [Google Analytics Opt-out Browser Add-on page](#).

Google Tag Manager. We may use Google Tag Manager, which allows marketed website tags to be managed using an interface. The tool itself (which implements the tags) does not use cookies and does not register identifiable data. The tool causes other tags to be activated which may, for their part, register personal information under certain circumstances. Google Tag Manager does not access this information. Google Tag Manager is subject to the Google Privacy Policy located at: <https://www.google.com/intl/en/policies/privacy>.

Meta Pixel. We may use Meta Pixel to customize and display advertisements only to Facebook users who have shown an interest in our Site or who have specific characteristics (e.g., certain demographics or interests in certain topics or products determined by websites visited) that we submit to Facebook. The use of Meta Pixel helps ensure that our advertisements are in line with the potential interests of users and do not have a nuisance effect. Meta Pixel also allows us to track the effectiveness of Facebook advertisements for statistical and market research purposes by seeing whether uses have been redirected to our Site after clicking on a Facebook advertisement. Meta Pixel is directly integrated into our Site by Facebook and can store a cookie on your device. The information collected about you is anonymous for us. However, the information collected via the Meta Pixel, on the Site as well as other websites on which Meta Pixel is installed, is also stored and processed by Meta. Meta may link this information to your Facebook account and also use it for its own promotional purposes in accordance with Facebook's Data Usage Policy. To understand more about Facebook advertising please visit: <https://www.facebook.com/about/ads>. You may deactivate Meta Pixel via the Cookie Settings on Facebook. The Settings are located at the bottom of the main page for logged in users at: <https://www.facebook.com/settings/?tab=ads#>.

LinkedIn: Our Sites also have cookies set by LinkedIn which are used to connect data from LinkedIn with actions performed on the Sites, to identify a browser ID, facilitate data center selection, and a visitor's consent regarding using cookies for non-essential purposes. These cookies enable LinkedIn to display ads on LinkedIn to those LinkedIn users who have visited our Sites. If you are logged into LinkedIn

with your user account, the fact that you visit our Sites is recorded in your user account. We have no control over the scope and further use of data collected by LinkedIn. Please see [LinkedIn's Privacy Policy](#) for more information on how they may use the data collected from our Sites. If you are a LinkedIn member, you may manage your preferences, including opting-out of LinkedIn and its partners tracking visits to LinkedIn for targeted advertising by going to LinkedIn's [Ads Settings](#) page. If you are not a LinkedIn member, you can opt-out of the tracking of these visits for targeted advertising purposes through [LinkedIn's Retargeting Opt-Out](#) page.

How Do Our Advertising and Marketing Partners Use Cookies for Interest-Based Advertising?

We may use third parties such as advertising networks and other content providers to serve targeted ads on our Site and on other websites like social media sites (e.g. LinkedIn). This practice is referred to as interest-based advertising. These advertising networks and/or content providers may use cookies and similar tracking technologies to uniquely distinguish you, your web browser, or your device and report certain information about your visits to our Sites and other websites (e.g., web pages you visit and your response to ads) in order to measure the effectiveness of our marketing campaigns and to deliver ads that are more relevant to you, both on and off the Sites and across your devices, including on social media sites. This information may also be used to evaluate our online advertising campaigns.

Some third parties may use data collection technologies to collect information from our Sites and combine it with other information they have collected relating to your web browser's activities across their network of websites, where permitted. We do not control these third parties' technologies or how they may be used. If you have questions about targeted content, you should contact the responsible party directly or consult their privacy policies. Please see examples of the opt-outs offered below.

How Can You Opt-Out from Interest-Based Advertising?

Some advertising networks we may use for these purposes may be members of the Digital Advertising Alliance ("DAA") or the Network Advertising Initiative ("NAI"). Please visit the websites below to learn more about interest-based advertising and to opt out of receiving personalized advertising or content from participating third-party advertising companies:

Digital Advertising Alliance: <https://optout.aboutads.info/?lang=EN&c=2#!%2F>

National Advertising Initiative: <https://optout.networkadvertising.org/?c=1#!%2F>

Please note that if you opt-out, you may still receive online advertising from us, but it will not be tailored to your interests based on online behavioral information about you. To successfully opt-out, you must have cookies enabled in your web browser (see your browser's instructions for information on cookies and how to enable them). Your opt-out only applies to the web browser you use, so you must opt-out of each web browser on each computer you use. Once you opt-out, if you delete your browser's saved cookies, you will need to opt-out again.

Choices About Cookies

We provide you with choices regarding the personal information you provide us and have created ways to give you control over our use of your information. You can control and manage cookies in various ways. Please keep in mind that removing or blocking cookies can negatively impact your user experience and parts of our site may no longer be fully accessible.

Most web browsers are set by default to accept cookies. If you do not wish to receive cookies you may set

your browser controls to refuse all or some types of cookies, or to alert you when cookies are being sent by website tracking technologies and advertising. When a user visits our Sites, the Site will prompt the user to confirm whether he or she approves of the use of a cookie. You may adjust your browser settings to opt-out of accepting a “persistent” cookie and to only accept “session” cookies, but will need to log in each time you want to enjoy the full functionality of the Site. You may also adjust your cookie preferences by using the cookies consent banner, if available.

Additional information is provided below about how to disable cookies or manage the cookie settings for some of the leading web browser providers. Please note these third-party links are provided for your convenience and we may not actively monitor the content of these links:

Google Chrome:	https://support.google.com/chrome/answer/95647?hl=en
Firefox:	https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences
Internet Explorer:	http://windows.microsoft.com/en-GB/windows-vista/Block-or-allow-cookies
Safari & iOS:	http://help.apple.com/safari/mac/8.0/#/sfr11471 and https://support.apple.com/en-us/HT201265
Microsoft Edge:	https://support.microsoft.com/en-us/microsoft-edge/delete-cookies-inmicrosoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09

For more information on how to modify your browser settings to block or filter cookies, visit <http://www.aboutcookies.org/> or <http://www.cookiecentral.com/faq/>. You may learn more about internet advertising practices and related consumer resources at <https://youradchoices.com/control>, <https://thenai.org/about-online-advertising/faq>, and <http://www.networkadvertising.org/choices>.

8. YOUR RIGHTS AND CHOICES REGARDING PERSONAL INFORMATION

Please use the “Contact Us” details provided at the end of this Privacy Policy to exercise your rights and choices under this Privacy Policy. We honor such requests when we are required to do so under applicable law.

Email Opt-Out: If you no longer wish to receive communications from us via email, you may opt-out by clicking the “unsubscribe” link at the bottom of our emails or by contacting us at the “Contact Us” information at the end of this Policy and providing your name and email address so that we may identify you in the opt-out process. Once we receive your instruction, we will promptly take corrective action.

Online Tracking Signals: We do not currently recognize browser settings or signals of tracking preferences, which may include “Do Not Track” instructions. “Do Not Track” is a web browser setting that seeks to disable the tracking of individual users’ browsing activities. However, because our Sites are not configured to detect Do Not Track Signals from a User’s computer due to the limits of current technology and solutions, we are unable to respond to Do Not Track requests.

Cookies: You may be able to set your browser to refuse all or some browser cookies or to alert you when cookies are being sent. You may also adjust your cookie preferences by using the cookies consent banner, if available.

Accuracy and Updating Your Information: Our goal is to keep your information accurate, current, and complete. You may send us an e-mail via the “Contact Us” details at the end of this Privacy Policy to correct or update any personal information that you have provided to us. For instance, if your email address changes, you may wish to let us know so that we can communicate with you. If you become aware of inaccurate personal information about you, you may want to update your information. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect. We are not responsible for any losses arising from inaccurate, inauthentic, deficient, or incomplete personal information that you provide to us.

9. INDIVIDUAL RIGHTS

To the extent you are a resident of certain U.S. states with comprehensive state privacy laws, you may be eligible for one or more of the following consumer rights where authorized by applicable U.S. state privacy laws. This section provides an overview of these rights which we honor where required by applicable law:

- **Right to Access.** Subject to certain conditions set forth in the applicable U.S. state privacy laws, you have the right to know and see what personal information we have collected about you and receive a copy of such information in a portable format, purposes for which we collect your personal information, recipients of your personal information to whom we disclose or share, which in some states may include categories of personal information collected, categories of sources of collection, business or commercial purposes for data processing, and categories of 3rd parties with whom we disclose that information.
- **Right to Correct.** Subject to certain conditions and exceptions set forth in the applicable U.S. state privacy laws, you have the right to request that we correct any inaccurate personal information that we have collected about you.
- **Right to Delete.** Subject to certain conditions and exceptions set forth in the applicable U.S. state privacy laws, you have the right to request that we delete the personal information we have collected about you.
- **Right to Opt-Out.** Subject to certain conditions set forth in the applicable U.S. state privacy laws, you have the right to opt out of targeted advertising, profiling, the sale or sharing of your personal information, to the extent such instances occur (as defined under applicable state laws). We do not have actual knowledge that we sell personal information of minors under 16 years of age.
- **Right to Non-Discrimination.** You have the right not to be discriminated against for exercising any of your rights under any applicable U.S. state privacy laws.
- **Right to Appeal.** To the extent the applicable U.S. state privacy laws provide such rights, you may appeal our denial to act on your consumer rights under the applicable state privacy laws within a reasonable time. We will respond within designated period for responding to U.S. data subject requests and may exercise the right to extend this response period (to the extent authorized by applicable state privacy laws).
- **Right to Limit Use and Disclosure of Sensitive Personal Information.** If any U.S. state privacy laws classify your personal information we collect as “sensitive personal information,” we use such data reasonably necessary to provide and perform our Services as requested by you or as otherwise permitted by law.

If you have questions or concerns regarding this Section or would like to exercise your consumer rights (to

the extent available under applicable U.S. state privacy laws), please use the “Contact Us” details at the end of this Policy.

10. LINKS TO THIRD-PARTY WEBSITES

This Privacy Policy does not apply to any third-party websites or applications.

Our Sites may contain links to websites or mobile applications operated and maintained by third parties. These links are to external websites and third parties that have their own privacy policies. If you follow any links that direct you away from the Sites or services, including links to social media sites or to other websites, this Privacy Policy will not apply to your activity on the other sites you visit. Because of the dynamic media capabilities of the Sites, it may not be clear to you which links are to our Sites and which are to external, third-party websites. If you click on an embedded third-party link, you will be redirected away from the Sites to the external third-party website. You can check the URL to confirm that you have left the Sites.

We cannot (i) guarantee the adequacy of the privacy and security practices employed by or the content and media provided by any third parties or their websites, (ii) control the privacy policies or the privacy practices of any third parties regarding their independent collection or use of your personal information, or (iii) endorse any third-party information, products, services or websites that may be reached through embedded links on the Sites.

Any personal information provided by you or automatically collected from you by a third party will be governed by that party’s privacy policy and terms of use. If you are unsure whether a website is controlled, affiliated, or managed by us, you should review the privacy policy and practices applicable to each linked website.

11. CHILDREN’S PRIVACY

Our Sites are not intended for children under 18 years of age. No one under age 18 may provide any personal information to or on the Sites. We do not knowingly collect personal information from children under 18. If you are under 18, do not use or provide any information on our Sites or on or through any of its features/register on the Sites, make any purchases through the Sites, use any of the interactive or public comment features of the Sites or provide any information about yourself to us. If we learn that we have collected personal information from any person under the age of 18 without verification of parental or guardian consent, we will delete that information as quickly as possible. If you are a parent or guardian of a child under 18 years of age and believe your child has provided us with personal information, please contact us via the instructions at the “Contact Us” section below.

12. UPDATES TO THIS PRIVACY POLICY

We reserve the right to add to, change, update, or modify this Privacy Policy at any time to reflect any changes to how we treat your information or in response to changes in law. In the event we make changes to this Privacy Policy, such policy will be re-posted on this page. If we make material changes to how we treat your personal information, we may notify you by e-mail to the e-mail address specified in your account and/or through a notice on the home page of our Sites. The date the Privacy Policy was last revised is identified at the top of the page. All changes are effective on the date listed at the top of this page and will apply to all information we have about you.

You are responsible for ensuring we have an up-to-date active and deliverable e-mail address for you, and for periodically visiting our Sites and this Privacy Policy to check for any changes. Your continued use of

the Sites and our services after the “Last Updated” date indicates your acceptance of the changes and your continued consent to our processing of your personal information according to the terms of the then-current Privacy Policy. If at any point you do not agree to any portion of this Privacy Policy, then you should immediately stop using the Sites and the services.

13. CALIFORNIA RESIDENTS

The following supplements the information contained in the Privacy Policy, applies solely to all natural persons residing in the State of California (“**Consumers**”), and is intended to comply with our obligations under the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights of 2020, and its implementing regulations (collectively referred to as the “**CCPA**”). Any terms defined in the CCPA shall have the same meaning when used herein.

Notice at Collection

We collect the following categories of Personal Information from California consumers:

Category	Description
Identifiers	<p>Examples: A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.</p> <p>Sold or Shared? We do not sell this category of personal information, but it may be shared for cross-context behavioral advertising.</p>
Personal information described in Cal. Civ. Code § 1798.80(e)	<p>Examples: A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, or medical information.</p> <p>Sold or Shared? We do not sell or share this category of personal information.</p>
Protected classification characteristics under California or federal law	<p>Examples: Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, pregnancy or childbirth and related medical conditions), sexual orientation, veteran, or military status.</p> <p>Sold or Shared? We do not sell or share this category of personal information.</p>
Internet or other similar network activity	<p>Examples: Browsing history, search history, information regarding a consumer's interaction with an internet website application, or advertisement.</p> <p>Sold or Shared? We do not sell this category of personal information, but it may be shared for cross-context behavioral advertising.</p>
Geolocation data	<p>Examples: Physical location or movements.</p> <p>Sold or Shared? We do not sell or share this category of personal information.</p>

Professional or employment-related information	Examples: Current or past job history or performance evaluations. Sold or Shared? We do not sell or share this category of personal information.
Inferences drawn from other personal information	Examples: Inferences drawn from any of the information identified in this list to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. Sold or Shared? We do not sell or share this category of personal information.
Sensitive Personal Information	Examples: Social Security number, driver’s license number, state identification number, passport number, account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account, precise geolocation information, racial or ethnic origin, religious, or philosophical beliefs, or union membership, contents of mail, email, and text messages unless the business is the intended recipient of the communication, genetic data, biometric data for the purposes of uniquely identifying a consumer, health information, sex life or sexual orientation information. Sold or Shared? We do not sell or share this category of personal information. **We only collect Sensitive Personal Information for legitimate business purposes appropriate for the use and disclosure of Sensitive Personal Information as defined in the California Privacy Laws, and do not otherwise use it to infer characteristics about you.

Exclusions from Personal Information: Personal information does not include:

- Publicly available information or lawfully obtained, truthful information that is a matter of public concern.
- Consumer information that is deidentified or aggregated.
- Information excluded from the scope of the CCRA including, but not limited to:
 - Personal information collected, processed, sold, or disclosed subject to the Gramm-Leach-Bliley Act (GLBA) or the California Financial Privacy Act.
 - An activity involving the collection, maintenance, disclosure, sale, communication, or use of any personal information bearing on a consumer’s credit worthiness, credit standing, credit capacity, character, general reputation, personal characteristics, or mode of living by a consumer reporting agency, a furnisher of information who provides information for use in a consumer report, and by a user of a consumer report provided that the agency, furnisher, or user is subject to regulation under the Fair Credit Reporting Act (FCRA).
 - Medical information governed by the Confidentiality of Medical Information Act or protected health information as governed by the U.S. Department of Health and Human Services pursuant to the Health Insurance Portability and Accountability Act of 1996 (HIPAA).
 - Personal information collected, processed, sold, or disclosed pursuant to the Driver’s Privacy Protection Act of 1994.

Categories of Sources: We have collected the Personal Information in this Privacy Policy form you directly when you provide it to us, automatically as you navigate through our Sites, and from our business partners, as applicable.

Business and Commercial Purposes for Collecting: We have collected the categories of Personal Information listed above for the purposes identified in the “How We May Use Your Information” in Section 3 of this Privacy Policy.

Categories of Personal Information Disclosed for a Business Purpose: We have disclosed the following categories of personal information to third parties for a business purpose during the preceding 12 months:

- Identifiers.
- Personal information described in Cal. Civ. Code § 1798.80(e).
- Protected classification characteristics under California or federal law.
- Internet or other similar network activity.
- Geolocation data.
- Professional or employment-related information.
- Inferences.

These categories of personal information have been disclosed for a business purpose to the following categories of third parties:

- Service providers or contractors (for services such as data analytics, data storage, mailing, marketing and advertising, payment processing, website and platform administration, technical support, security monitoring, and operating systems and platforms).
- Third parties with your consent
- Investors.
- Government entities.
- Marketing providers.

Prior to disclosing any personal information to a service provider or contractor for a business purpose, we enter into a written contract which describes, among other things: (1) the specific purpose which the personal information can be used by the service provider or contractor to perform the services specified in the contract; (2) requires the service provider or contractor to keep any personal information confidential; (3) prohibits the service provider or contractor receiving the personal information from retaining, disclosing, or using the personal information for any purpose other than performing and providing services under the contract; (4) provides us the right to take reasonable and appropriate steps to ensure that the service provider or contractor uses personal information in accordance with contractual terms.

Categories of Personal Information Sold: We do not sell your personal information and will not sell your personal information unless we modify this Policy and take additional steps as may be required under the CCPA.

Categories of Personal Information Shared: We share personal information, such as California residents’ use of our Sites with our marketing and advertising partners for cross-context behavioral advertising as further described below and in our Privacy Policy. We have shared the following categories of personal information with third parties for cross-context behavioral advertising:

- Identifiers

- Internet or other similar network activity

These categories of personal information have been shared with third party social media platforms and analytics providers for the purpose of cross-context behavioral advertising.

We do not sell or share personal information of anyone we know to be under 18 years of age.

California Consumer Rights and Choices

The CCPA provides consumers with specific rights regarding their personal information. This section describes your rights and explains how to exercise those rights. You may submit requests to us as described below and we honor those rights where they apply.

Right to Know: You have the right to request that we disclose Personal Information that it has collected, sold, or shared about you. This includes a request for any or all of the following:

- The categories of personal information we have collected about you.
- The categories of sources from which the personal information is collected.
- The categories of personal information that we have sold or disclosed for a business purpose about you.
- The categories of third parties to whom the personal information was sold or disclosed for a business purpose.
- The specific pieces of personal information we collected about you.
- The business or commercial purpose for collecting, selling, or sharing personal information.

Right to Delete: You have the right to request that we delete any Personal Information that we have collected, sold, or shared about you.

Right to Limit: In certain circumstances, you have the right to limit the use and disclosure of sensitive personal information. Our use of your sensitive personal information is solely for business purposes and not for those purposes for which a consumer may exercise a right to limit the use or disclosure under the CCPA. Therefore, we include this disclosure of information for information purposes only.

Right to Opt-Out of Sale/Sharing: You have the right to direct a business that sells or shares personal information about you to third parties to stop doing so. While we do not sell any personal information, we do share some personal information for the purposes of cross-context behavioral advertising.

Right to Correct: You have the right to request that we correct inaccurate Personal Information that we maintain about you. Our goal is to keep your personal information accurate, current, and complete.

Other California Privacy Rights: California's "Shine the Light" law (Civil Code Section § 1798.83) permits California residents who are users of our Sites to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. We do not disclose your personal information for direct marketing purposes.

Under California Civil Code Section 1798.83, California residents who provide personal information in obtaining products or services for personal, family, or household use may be entitled to request and obtain from us once a calendar year information about the information we shared, if any, with other businesses for direct marketing uses. Please be aware that not all information sharing is covered by the "Shine the Light" requirements and only information on covered sharing, if any, will be included in our response. As part of

the California Online Privacy Protection Act, all users of our Sites may make any changes to their information at any time by contacting us at privacy@ascentco.com.

How to Submit Requests to Know, Requests to Delete, and Requests to Correct

You may submit a request a Request to Know, Request to Delete, or Request to Correct by either: 1) Mailing us at: 20 N Martingale Road, Suite 430, Schaumburg, IL 60173 Attn: Privacy, or 2) e-mailing: privacy@ascentco.com

How to Submit Requests to Opt-Out

You may submit a Request to Opt-Out by: 1) Submitting the [Online Request Form](#); 2) Mailing us at: 20 N Martingale Road, Suite 430, Schaumburg, IL, 60173 Attn: Privacy; or 3) Emailing: privacy@ascentco.com

Verification Procedures

We are required by the CCPA to verify the identity of individuals who submit a Request to Know, Request to Delete, or Request to Correct. We will take steps to verify your identity before granting you access to such personal information or acting on your request to exercise your rights as outlined below.

A verifiable consumer request must provide sufficient information that allows us to reasonably verify that you are the person about whom we collected information. Whenever feasible, we will verify your identity by matching the identifying information provided by you in the request to the personal information we may already maintain about you. As part of this process, we ask that you provide the following information when submitting your request: name, telephone number, and email address.

You may designate an authorized agent to make a Request to Know, Request to Delete, or Request to Correct on your behalf. If you use an authorized agent to submit a request, we require the authorized agent to provide proof that the consumer gave the authorized agent signed, written permission to submit the request. We may also require you to verify your identity directly with us and you to directly confirm with us that you provided the authorized agent permission to submit the request. We will inform you if we cannot verify your identity.

- If we cannot verify the identity of the person making a Request to Know specific pieces of personal information, we are prohibited from disclosing any specific pieces of personal information to the requestor. However, if denied in whole or in part for this reason, we will evaluate the request as if it is seeking the disclosure of categories of personal information about the consumer. If we still cannot verify the request, and the request is denied in whole or in part, we will provide a copy of, or direct you to, our Privacy Policy.
- If we cannot verify the identity of the person making a Request to Delete or Request to Correct, we may deny the request and inform the person making the request that their identity cannot be verified.

Response Timing: Upon receiving a Request to Know, Request to Delete, or Request to Correct, we will confirm receipt of the request within 10 business days and provide information about how we will process your request. The information provided will include our verification process and when you should expect a response from us (unless we have already granted or denied the request). In general, we will respond to a request within 45 calendar days from the day the request is received but, if necessary, we may take an additional 45 calendar days to respond to the request. If this extension is needed, we will notify you of the

extension and explain the reasons that responding to your request will take more than 45 calendar days. We will respond to a Request to Opt-Out within fifteen (15) business days from the date we received your request.

Response Process: If you have an online account with us, we may deliver our written response to that account along with any requested personal information that may be responsive to your request in a portable and, to the extent technically feasible, readily usable format. If you do not have an account with us, we will deliver our written response and any requested personal information that may be responsive to you by mail or electronically, at your option. The response we provide will also explain the reasons we cannot comply with a request, if applicable. 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.

Limitations: We are committed to responding to requests in accordance with applicable law. However, your rights are subject to certain limitations including, but not limited to, the following:

- We are only required to respond to Requests to Know twice in a 12-month period.
- A response to a Request to Know may be limited to the 12-month period preceding receipt of the request if it would be impossible, involve disproportionate effort, or the request is for data for a specific time period.
- We are prohibited from disclosing certain specific pieces of personal information in response to a Request to Know including, but not limited to, Social Security numbers, driver's license numbers, and financial account numbers.

Non-Discrimination

We will not discriminate against you for exercising any of your CPRA rights including, but not limited to, by:

- Denying you goods or services.
- Charging you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Providing you a different level or quality of goods or services.
- Suggesting that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

14. CONTACT US

For more information, or if you have any questions or comments about this Privacy Policy and our privacy practices, you may contact us using the information below.

In Writing: 20 N. Martingale Road
Suite 430
Schaumburg, IL 60173

By Email: privacy@ascentco.com