

Privacy Policy

Last Updated: February 18, 2020

This Privacy Policy applies to the Website of Lankhorst Yarns, a WireCo® WorldGroup brand, located at <http://www.lankhorstropes.com> (the “Site”). Lankhorst Yarns or WireCo® WorldGroup and our affiliates may be referred to as “our,” “us,” or “we.” We may refer to you as “you” or “user.” Your privacy is important to us and we are committed to protecting the personally identifiable information (“Personal Information”) that you disclose to us. Personal Information includes your name, mailing address, phone number, e-mail address, and other such information. This Privacy Policy explains how we collect Personal Information from users of our Site, how we use the Personal Information and non-Personal Information we collect, how we protect your Personal Information, and make other disclosures.

This Privacy Policy is subject to change without prior notice. For that reason, we encourage you to review this Privacy Policy periodically and to make note of the date of the most recent revision. If you disagree with the manner in which we intend to use the Personal Information you provide to us, you may opt-out of these uses by following the instructions below. By using our Site, you agree to the terms of the Privacy Policy in effect at that time.

I. Information We Collect

We collect Personal Information through this Site in order to respond to customer inquiries and to help us develop products that meet our customers’ needs. We also collect Non-Personal Information as described below. You are not obligated to provide us with Personal Information in order to use the Site.

A. Information We Collect Automatically

"Cookies" are text files that are placed on an individual's computer hard drive to enable the individual to more easily communicate and interact with our Web site. Using cookie technology, we track your click path through our Site. We may use it to help customize your visit to our Site. We may also use cookies to record how many times a user has visited our Site and what pages the user has accessed. You may, however, disallow receiving cookies at any time through your Web browser. It is not our intention to use cookies to retrieve information that is unrelated to our Site or your interaction with our Site.

B. Information We Collect When You Provide It

Our Site is designed allow users to contact us directly with comments, requests, and inquiries regarding our products and services. We may collect Personal Information in a number of ways. Our “Contact Us” page lists fax, phone, e-mail and online inquiry options. If you choose to utilize the

online inquiry form, you will be asked to submit Personal Information to us. We also post employment opportunities on our “Jobs/Careers” page and accept submission of resumes and job applications via e-mail links from our Site. In addition, we offer our users the opportunity to receive our free e-newsletter by submitting their names, e-mail addresses and other necessary Personal Information. We collect Personal Information from users who choose to send us inquiries through use of any of the options described above.

The following sets out the legal basis for our processing of your personal Information: when you register for an account or interact with our Site or services, such processing is necessary for the performance of our services; when you respond to or enquire about an employment opportunity, such processing is necessary for the performance of our services; when you communicate with us or sign up for promotional materials or accept cookies, we process such data on the basis of our legitimate interest, and our legitimate interest is to provide you with our marketing communications; where we are required under applicable local law to obtain your consent for sending you marketing information, the legal basis is your consent; when we process or share personal data in the event of a sale, we process such data for our legitimate interest in providing our services; when we investigate suspected illegal or wrongful activity, we process such data on the basis of our legitimate interest and our legitimate interest is to ensure compliance with legal requirements and law enforcement requests and for public safety purposes.

II. Information of Children

We do not knowingly collect any Personal Information from any users under the age of 13 or from users between the ages of 13 and 18. Due to the serious nature of our Site, and the lack of games or other child friendly pages, we have no reason to believe that any children under the age of 18 would be attracted to our Site or have reason to submit any Personal Information to us.

III. Use of Personal Information

We use Personal Information in order to learn more about our customers, to measure usage patterns on the Site, to enable us to respond to our customer’s questions and requests, and to help us in developing products and services to meet our customer’s needs. If you submit your Personal Information to us it may be retained in our internal database system for data collection, business research and record keeping purposes. In addition, we will e-mail our e-newsletter to users who have requested it and who have provided us with working e-mail addresses and any other reasonable Personal Information we require. Any user who wishes to cancel receipt of the e-newsletter may do so by following the instructions in the Opt-Out section below. Additional use of your Personal Information that is not described in this Privacy Policy will only take place as required by statute or when we have obtained your consent.

IV. Sharing of Personal Information

We will not provide or sell any Personal Information to marketing research or bulk advertising sales companies. However, we may forward your product requests and inquiries to one of our product

distributors in order to enable you to purchase products directly from such distributor and to ensure that your requests are met in the most timely and efficient manner or service providers that perform services on our behalf. In addition, we may disclose personal information about you (a) if we are required or permitted to do so by law or legal process, for example due to a court order or a request from a law enforcement agency, (b) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, (c) in connection with an investigation of suspected or actual fraudulent or other illegal activity, and (d) in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganization, dissolution, or liquidation). We do not sell your Personal Information, and have not done so in the 12 months preceding the effective date of this Privacy Policy.

The GDPR and national laws of European Union member states implementing the Regulation permit the sharing of Personal Information relating to users who are residents of the European Economic Area with third parties only under certain circumstances. If you reside in the European Economic Area or the United Kingdom, we will only share your Personal Information as described in our Privacy Policy under the heading "Sharing of Personal Information" if we are permitted to do so under applicable European and national data protection laws and regulations.

V. Retention Period

We retain Personal Information for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law.

VI. Links to Third-Party Web sites

We may include on our Site one or more links to Web sites owned and controlled by third-parties, such as our distributors and customers. We provide these links as a convenient means of accessing information that may be useful or of interest to you. Please note, however, that when you click on a link to a third party's Web site, you will not be alerted that you are leaving our Site. This Privacy Policy and the practices that we follow under this Privacy Policy do not apply to the Web sites of any third parties. Third party Web sites are operated independently from our Site. We are not responsible for, nor do we have any control over, the products, services, content, accuracy, or opinions expressed on any third party Web site or for the privacy practices or security standards used by third parties on their respective Web sites. We will not, and are under no obligation to investigate, monitor or check any third party Web sites to which we link for accuracy or completeness, or for any incorrect, inflammatory, slanderous, defamatory, infringing, or unlawful content of materials. Nor are we under any obligation to investigate or monitor how third party Web sites collect, use, or secure any Personal Information you provide to them. You understand and agree that by clicking on a link to a third party's Web site, you have left this Site, and the terms stated in this Privacy Policy are no longer in effect.

Do Not Track

Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. We do not currently recognize or respond to browser-initiated DNT signals.

VII. Opt-Out

You may choose to have your name taken off of our e-newsletter list, to review and/or update the information that you have provided to us, or to request the removal of your Personal Information from our database by calling or sending a fax to us at the phone numbers listed on the “Contact Us” page of our Site, or by sending us an e-mail by clicking on the “information request” link on our “Contact Us” page.

VIII. Security

We are committed to ensuring that your information is secure. In order to prevent unauthorized access or disclosure, we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure the information we collect online. However, due to the open communication nature of the Internet, we cannot guarantee that communications between you and us, and us and you will be free from unauthorized access by third parties.

IX. Your Acceptance of this Policy

By using this Site, you signify your acceptance of our Privacy Policy. If you do not agree to this Privacy Policy, please do not use our Site. We reserve the right, at our discretion, to change, modify, add, or remove portions from this Privacy Policy at any time so visitors are encouraged to review this policy from time to time. Your continued use of our Site following the posting of changes to these terms means you accept these changes.

X. How to exercise your rights

We take steps to keep your Personal Information accurate and up to date. Individuals in Andorra, Argentina, Australia, California, Canada, European Union, Faroe Islands, Guernsey, Hong Kong, Israel, Isle of Man, Japan, Jersey, Mexico, New Zealand, Singapore, South Korea, Switzerland, the United Kingdom, Uruguay, and certain other jurisdictions may have certain data subject rights. These rights vary, but they may include the right to: (i) request access to and rectification or erasure of their personal data; (ii) restrict or object to the processing of their personal data; and (iii) obtain a copy of their personal data in a portable format. Individuals may also have the right to lodge a complaint about the processing of personal data with a competent local or national data protection authority. We do not sell your information, so you are already opted-out of such sales. We will not discriminate against you for exercising any of these rights, for example, by charging a different price or denying goods or services.

If you wish to exercise any of these rights please contact us by calling or sending a fax to us at the phone numbers listed on the “Contact Us” page of our Site, or by sending us an e-mail by clicking on the “information request” link on our “Contact Us” page. We will review your requests and respond

accordingly. The rights described herein are not absolute and we reserve all of our rights available to us at law in this regard. Additionally, if we retain your Personal Information only in de-identified form, we will not attempt to re-identify your data in response to a request.

If you make a request related to Personal Information about you, we will need to verify your identity. If it is necessary to collect additional information from you, we will use the information only for verification purposes and will delete it as soon as practicable after complying the request.

If you make a request through an authorized agent, we will require written proof that the agent is authorized to act on your behalf.

XI. Transfers from the European Economic Area

By using the Site you understand that your Personal Information will be transferred to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your Personal Information. Some of the non-EEA countries are recognized by the European Commission as providing an adequate level of data protection according to EEA standards (the full list of these countries is available here). For transfers from the EEA to countries not considered adequate by the European Commission, we have put in place adequate measures to protect your Personal Information. You may obtain further information of these on request by using the “Contact Us”.

XII. GDPR and UK Data Protection Act - Right to lodge a complaint before the Data Protection Authority

We encourage you to contact us directly and allow us to work with you to address your concerns. Nevertheless, where the GDPR or UK Data Protection Act 2018 applies you have the right to lodge a complaint with a competent local or national data protection supervisory authority, in particular in the EU Member State where you reside, work or the place of the alleged infringement. You have the right to do so if you consider that the processing of Personal Information relating to you infringes applicable data protection laws.

XIII. California Consumer Privacy Act Disclosure

The California Consumer Privacy Act (“CCPA”) requires us to provide additional information about the personal information we collect with reference to specific categories of information. For additional information about our sources of personal data, how we use personal data, and how we disclose personal data for a business purpose, refer to Sections I, III, and IV. This Section does not apply to information we collect from our employees, contractors, or applicants for employment. Within the last twelve months, we have collected the following categories of personal information from California residents:

| Category | Examples |
|---|---|
| Identifiers. | Name, postal address, Internet Protocol address, email address, or other similar identifiers. |
| Commercial information. | Products or services purchased, obtained, or considered. |
| Internet or other similar network activity. | Information on a consumer's interaction with our website. |
| Professional or employment-related information. | Employer details. |

XIV. Contact Us

If you have any questions about this Privacy Policy, please contact us by calling or sending a fax to us at the phone numbers listed on the “Contact Us” page of our Site, or by sending us an e-mail by clicking on the “information request” link on our “Contact Us” page.

XV. Governing Law

This Privacy Policy is governed by and interpreted in accordance with the laws of the State of Kansas applicable to agreements entered into and performed entirely within the State of Kansas, without giving effect to the choice or conflicts of law provisions thereof.