

## California Privacy Notice

Thank you for your interest in Mardel, Inc. (“Mardel,” “we,” “our,” or “us.”) The California Consumer Privacy Act of 2018 as amended from time to time (the “CCPA”), provides certain rights pertaining to the personal information belonging to any natural person who is a California resident (“Consumer,” “you,” or “your”) that we collect, use, disclose, or sell. We developed this California Privacy Notice (“Notice”) to inform you of your rights and explain our practices regarding the personal information we collect, use, and share through this website, when communicating with us, when purchasing products from us, or otherwise in the course of operating our business.

This Notice supplements our [\[Privacy Policy\]](#), to describe our collection, use, and disclosure of personal information. All defined terms within the CCPA, including those defined in Section 1798.140 of the California Civil Code, apply for the purposes of interpreting this Notice. Any capitalized term used herein that is not otherwise defined shall have the meaning ascribed in our Privacy Policy.

**By accessing or using our website, submitting information to us, or otherwise acknowledging this Notice, you understand and consent to our collection and use of your personal information as described in this Notice and our [\[Privacy Policy\]](#).**

**Collection and Use of Personal Information.** Before we collect personal information, we inform Consumers as to the categories of personal information to be collected and the purposes for which the categories of personal information will be used. We will not collect additional categories of personal information or use personal information collected for additional purposes without providing Consumers with notice. The categories of personal information we collect and purposes for which the categories of personal information may be used are listed in our [\[Notice at Collection\]](#).

**Request to Delete.** A Consumer may request us to delete any personal information about the Consumer which we have collected or maintained.

Unless an exemption applies, we are required to delete the personal information from our records and direct any service providers to delete the personal information from their records within 45 days (or 90 days if written notice of a 45-day extension is given during the initial 45 days) of receiving a request. To submit a request through this website, please click [here](#); to submit a request via telephone, please call 800-901-7977. We are not required to respond to requests more than two times in a 12-month period.

Each request requires the Consumer’s name, postal address, and email address. Our verification process consists of matching these data points with the information we have collected. If these data points cannot be matched with the information we have collected, then we will state so in the response to a Consumer’s request. We will communicate to you through your email address.

After submitting a request, you will be prompted to authenticate your email address within seven (7) days of submitting your request. If you do not authenticate your email address within seven (7) days of submitting your request, your request will not be considered.

Please note that we are not required to comply with a deletion request if it is necessary for us or our service provider to maintain the personal information to:

- Complete the transaction for which the personal information was collected;
- Provide a good or service requested by the Consumer or reasonably anticipated within the context of our ongoing business relationship with the Consumer;
- Perform a contract between us and the Consumer;
- Detect security incidents; protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;
- Debug to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another Consumer to exercise free speech, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code.
- To enable solely internal uses that are reasonably aligned with the expectations of the Consumer based on the Consumer's relationship with us.
- Comply with a legal obligation; or
- Otherwise use the Consumer's personal information, internally, in a lawful manner that is compatible with the context in which the Consumer provided the information.

**Request to Know.** A Consumer may request the following information from us pertaining to the Consumer's personal information that we collect, use, disclose, and sell:

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

We must disclose the above information within 45 days (or 90 days if written notice of a 45-day extension is given during the initial 45 days) of receiving a request. To submit a request through this website, please click [here](#); to submit a request via telephone, please call 800-901-7977. We are not required to respond to requests more than two times in a 12-month period.

Each request requires the Consumer's name, postal address, and email address. Our verification process consists of matching these data points with the information we have

collected. If these data points cannot be matched with the information we have collected, then we will state so in the response to a Consumer's request. We will communicate to you through your email address.

After submitting a request, you will be prompted to authenticate your email address within seven (7) days of submitting your request. If you do not authenticate your email address within seven (7) days of submitting your request, your request will not be considered.

We are not required to retain any personal information collected for a single one-time transaction if, in the ordinary course of business, that information is not retained.

We are also not required to reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered personal information.

**Opt Out and Opt In of Sale of Personal Information**. A third party cannot sell personal information that has been sold to the third party by us unless the Consumer has received explicit notice and is provided an opportunity to exercise the right to opt out.

We do not and will not sell personal information. However, any Consumer has the right, at any time, to direct a business that sells personal information to third parties not to sell the Consumer's personal information. This right is referred as the right to opt out.

If we sell personal information, we must provide notice that this information may be sold and that Consumers have the right to opt out of the sale of their personal information.

We are not allowed to sell the personal information of any Consumers whom we have actual knowledge is less than 16 years of age, unless the Consumer, in the case of those between 13 and 16 years of age, or a parent or guardian, in the case of Consumers who are less than 13 years of age, has affirmatively authorized the sale of personal information. A business that willfully disregards the age shall be deemed to have had actual knowledge of the age. This right is referred as the right to opt in.

If we receive direction from a Consumer not to sell personal information (or we have not obtained consent from a parent or guardian of a Consumer less than 13 years of age), we shall be prohibited from selling the Consumer's personal information, unless the Consumer (or parent or guardian in case of Consumer less than 13 years of age) subsequently provides express authorization for the sale of the Consumer's personal information.

**Discrimination Prohibited**. We cannot discriminate because a Consumer exercised rights under the CCPA, including, but not limited to, by:

- Denying goods or services;
- Charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;

- Providing a different level or quality of goods or services; or
- Suggesting that the Consumer will receive a different price or rate for goods or services or a different level or quality of goods or services.

We may charge a different rate or price, or provide a different level or quality of goods or services, if that difference is reasonably related to the value of the Consumer's data.

We may offer financial incentives for the collection of personal information, the sale of personal information, or the deletion of personal information. We may also offer a different price, rate, level, or quality of goods or services if that price or difference is directly related to the value of the Consumer's data.

If we offer financial incentives, we must provide notice of such incentives in accordance with the CCPA.

We may enter a Consumer into a financial incentive program only if prior opt-in consent is given which clearly describes the material terms of the financial incentive program, and which may be revoked at any time.

We will not use financial incentive practices that are unjust, unreasonable, coercive, or usurious in nature.

**Categories of Personal Information Collected**. The following is a list of the categories of personal information we have collected about Consumers in the preceding 12 months, and will collect from you based on how you interact with us. For each category of personal information collected, we have provided the categories of sources from which we collect that information, the business or commercial purpose(s) for which we collect the information, and the categories of third parties with whom we share personal information.

Identifiers Such As a Real Name, Alias, Postal Address, Unique Personal Number, Online Identifier, Internet Protocol Address, Email Address, Account Name, Social Security Number, Driver's License number, Passport Number, or Other Similar Identifiers

The **categories of sources** from which this information is collected are the Consumers directly, operating systems and platforms, product suppliers, social networks, advertising networks, and data analytics providers.

The **business or commercial purpose(s)** for which we collect this information are to audit trail logging; communicate about products, services, offers, promotions, news, upcoming events, and other information; complete visitor logs; conduct email campaigns; coordinate international shipments; correspond with business partners; create and manage accounts; create and send invoices; create and send purchase confirmations; deliver and enhance emails, websites, or other online communication; deposit checks; determine demographic and/or residential information; determine purchase history; engage with a Consumer via social media; engrave names on products; identify operational events; inform, optimize, and serve advertisements; investigate and prevent

fraudulent transactions and other illegal activities; mail information; monitor and analyze trends, usage and activities; obtain conveyor system data for daily operations; obtain marketing information; personalize Consumers' experiences; process and complete transactions; process and deliver contest or sweepstakes entries and prizes; process federal and state income tax credits; process federal and state returns/reports; process requests to sign up for email alerts; process tax exempt information; process unclaimed property information; provide and deliver products and services; provide receipts; provide, maintain, and improve the Service of our overall business; receive feedback from our app; respond to a Consumer's comments and questions; provide customer service; respond to credit/debit card disputes; retrieve/exchange card information; review/process/defend claims; safeguard against bad checks; send a Consumer certain information, including purchase confirmations, invoices, updates, security alerts, recall notices and support and administrative messages; and send daily reports.

The **categories of third parties** with whom we share this personal information are advertising networks, background screening companies, banks, check authorization companies, check recovery companies, credit check companies, credit check references, data analytics providers, delivery and courier providers, e-commerce websites, engineering companies, government entities, law enforcement, legal compliance providers, operating systems and platforms, order fulfillment providers, payment processing companies, printing companies, product suppliers, security companies, social networks, and third party administrators.

Other Information that Identifies, Relates To, Describes, or is Capable of Being Associated with a Particular Individual (Personal Information Described in Subdivision (e) of Section 1798.80 of the California Civil Code other than Those Already Described in this Notice)

The **categories of sources** from which this information is collected are the Consumers directly.

The **business or commercial purpose(s)** for which we collect this information are to communicate about products, services, offers, promotions, news, upcoming events, or other information; conduct credit checks; create and manage accounts; create and send invoices; create and send purchase confirmations; investigate and prevent fraudulent transactions and other illegal activities; monitor and analyze trends, usage, and activities; process and complete transactions; process federal and state income tax credits; process federal and state returns/reports; process tax exempt information; provide and deliver products and services; respond to a Consumer's comments and questions; provide customer service; review/process/defend claims; safeguard against bad checks; and send a Consumer certain information, including purchase confirmations, invoices, updates, security alerts, recall notices and support and administrative messages.

The **categories of third parties** with whom we share this personal information are background screening companies, check authorization companies, check recovery

companies, government entities, legal compliance providers, operating systems and platforms, and third party administrators.

#### Characteristics of Protected Classifications under California or Federal Law

The **categories of sources** from which this information is collected are the Consumers directly, social networks, advertising networks, data analytics providers, and operating systems and platforms.

The **business or commercial purpose(s)** for which we collect this information are to conduct credit checks; deliver and enhance emails, websites, or other online communication; investigate and prevent fraudulent transactions and other illegal activities; monitor and analyze trends, usage, and activities; obtain marketing information; personalize Consumers' experiences; process federal and state income tax credits; process federal and state returns/reports; process tax exempt information; review/process/defend claims; and safeguard against bad checks.

The **categories of third parties** with whom we share this personal information are advertising networks, background screening companies, check authorization companies, check recovery companies, credit check companies, data analytics providers, e-commerce websites, government entities, law enforcement, legal compliance providers, operating systems and platforms, payment processing companies, security companies, social networks, and third party administrators.

#### Commercial Information, Including Records of Personal Property, Products or Services Purchased, Obtained, or Considered, or Other Purchasing or Consuming Histories or Tendencies

The **categories of sources** from which this information is collected are the Consumers directly, social networks, advertising networks, data analytics providers, and operating systems and platforms.

The **business or commercial purpose(s)** for which we collect this information are to audit trail logging; communicate about products, services, offers, promotions, news, upcoming events, or other information; conduct email campaigns; create and send invoices to Consumers; create and send purchase confirmations to Consumers; deliver and enhance emails, websites, or other online communication; deliver and enhance mobile websites and applications; determine purchase history; inform, optimize, and serve ads; investigate and prevent fraudulent transactions and other illegal activities; monitor and analyze trends, usage, and activities; obtain marketing information; personalize Consumers' experiences; personalize websites; process and complete transactions; respond to a Consumer's comments or questions; provide customer service; provide, maintain, or improve Service for Consumers; respond to credit/debit card disputes; and ship product(s) to Consumers.

The **categories of third parties** with whom we share this personal information are social networks, advertising networks, data analytics providers, operating systems and platforms, security companies, social networks, advertising networks, data analytics providers, security companies, payment processing companies, operating systems and platforms, and banks.

#### Biometric Information.

We have not collected any biometric information from Consumers in the preceding 12 months.

#### Internet or Other Electronic Network Activity Information, Including, But Not Limited To, Browsing History, Search History, and Information Regarding a Consumer's Interaction with an Internet Website, Application, or Advertisement

The **categories of sources** from which this information is collected are the Consumers directly, social networks, advertising networks, data analytics providers, and operating systems and platforms.

The **business or commercial purpose(s)** for which we collect this information are to audit trail logging; communicate about products, services, offers, promotions, news, upcoming events, or other information; conduct email campaigns; create and send purchase confirmations; deliver and enhance emails, websites, or other online communication; determine demographic and/or residential information; determine purchase history; monitor and analyze trends, usage, and activities; obtain marketing information; personalize Consumers' experiences; provide, maintain, and improve the Service or our overall business; receive feedback from our app; and send a Consumer certain information, including purchase confirmations, invoices, updates, security alerts, recall notices and support and administrative messages.

The **categories of third parties** with whom we share this personal information are advertising networks, data analytics providers, operating systems and platforms, security companies, and social networks.

#### Geolocation Data

The **categories of sources** from which this information is collected are the Consumers directly, social networks, advertising networks, data analytics providers, and operating systems and platforms.

The **business or commercial purpose(s)** for which we collect this information are to audit trail logging; deliver and enhance emails, websites, or other online communication; determine demographic and/or residential information; monitor and analyze trends, usage and activities; obtain marketing information; personalize Consumers' experiences; and provide, maintain, and improve the Service or our overall business.

The **categories of third parties** with whom we share this personal information are social networks, advertising networks, data analytics providers, government entities, operating systems and platforms, and security companies.

#### Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information

The **categories of sources** from which this information is collected are the Consumers directly, social networks, advertising networks, data analytics providers, and operating systems and platforms.

The **business or commercial purpose(s)** for which we collect this information are to audit trail logging; communicate about products, services, offers, promotions, news, upcoming events, or other information; deliver and enhance emails, websites, or other online communication; investigate and prevent fraudulent transactions and other illegal activities; monitor and analyze trends, usage, and activities; obtain marketing information; personalize Consumers' experiences; process tax exempt information; and respond to credit/debit card disputes.

The **categories of third parties** with whom we share this personal information are social networks, advertising networks, data analytics providers, government entities, security companies, operating systems and platforms, and payment processing companies.

#### Professional or Employment-Related Information

The **categories of sources** from which this information is collected are the Consumers directly.

The **business or commercial purpose(s)** for which we collect this information are to review/process/defend claims and audit trail logging.

The **categories of third parties** with whom we share this personal information are legal compliance providers, third party administrators, security companies, and government entities.

#### Education Information

The **categories of sources** from which this information is collected are the Consumers directly.

The **business or commercial purpose(s)** for which we collect this information are to review/process/defend claims.

The **categories of third parties** with whom we share this personal information are third party administrators.

**IN ADDITION TO THE PURPOSES ABOVE, IF A CONSUMER IS A PROSPECTIVE/CURRENT EMPLOYEE, WE MAY COLLECT THE FOLLOWING INFORMATION FROM THE CONSUMER:**

Identifiers Such As a Real Name, Alias, Postal Address, Unique Personal Number, Online Identifier, Internet Protocol Address, Email Address, Account Name, Social Security Number, Driver's License number, Passport Number, or Other Similar Identifiers

The **categories of sources** from which this information is collected are the Consumers directly, operating systems and platforms, product suppliers, social networks, advertising networks, and data analytics providers.

The **business or commercial purpose(s)** for which we collect this information are to complete applicant logs; assign work to employees; complete direct deposit forms; complete government forms; conduct background checks; conduct drug tests; correspond with business partners; create/maintain employee files; deposit checks; verify employment status; initiate and maintain benefits for employee; initiate direct deposit; maintain information with government entities; make payment for products or services; process employment; process payroll; provide training to employees; reimburse expenses; review and approve policy; review/perform services related to human resources and/or leave; and complete temporary employee logs.

The **categories of third parties** with whom we share this personal information are accounting firms, background screening companies, banks, employee benefits providers, employment screening companies, financial service companies, healthcare management companies, healthcare providers, human resource providers, insurance companies, international supply chain partners, investment companies, legal compliance companies, past employers, payroll companies, third party administrators, third party vendors, and travel agencies.

Other Information that Identifies, Relates To, Describes, or is Capable of Being Associated with a Particular Individual (Personal Information Described in Subdivision (e) of Section 1798.80 of the California Civil Code other than Those Already Described in this Notice)

The **categories of sources** from which this information is collected are the Consumers directly.

The **business or commercial purpose(s)** for which we collect this information are to conduct background checks; create/maintain employee files; emergency contact information; initiate and maintain benefits for employees; maintain information with government entities; provide training to employees; reimburse expenses; review and approve policy; and review/perform services related to human resources and/or leave.

The **categories of third parties** with whom we share this personal information are background screening companies, employee benefits providers, employment screening companies, financial service companies, healthcare management companies, healthcare providers, human resources providers, insurance companies, investment companies, legal compliance providers, payroll companies, and third party administrators.

## Characteristics of Protected Classifications under California or Federal Law.

The **categories of sources** from which this information is collected are the Consumers directly, social networks, advertising networks, data analytics providers, and operating systems and platforms.

The **business or commercial purpose(s)** for which we collect this information are to complete government forms; conduct background checks; conduct drug tests; create/maintain employee files; verify employment status; initiate and maintain benefits for employees; maintain medical files; process certifications for licenses; provide emergency contact information; qualify employees for licensure by government entities; and review/perform services related to human resources and/or leave.

The **categories of third parties** with whom we share this personal information are accounting firms, background screening companies, employee benefits providers, employment screening companies, financial service companies, government entities, healthcare management companies, healthcare providers, human resources providers, insurance companies, investment companies, legal compliance providers, payroll companies, pharmacies, third party administrators, and travel agencies.

## Commercial Information, Including Records of Personal Property, Products or Services Purchased, Obtained, or Considered, or Other Purchasing or Consuming Histories or Tendencies.

The **categories of sources** from which this information is collected are the Consumers directly, social networks, advertising networks, data analytics providers, and operating systems and platforms.

The **business or commercial purpose(s)** for which we collect this information are to initiate and maintain benefits for employees; reimburse expenses to employees; and review/perform services related to human resources and/or leave.

The **categories of third parties** with whom we share this personal information are healthcare management companies, healthcare providers, pharmacies, third party administrators, employee benefits providers, insurance companies, financial service companies, payroll companies, and legal compliance providers.

## Internet or Other Electronic Network Activity Information, Including, But Not Limited To, Browsing History, Search History, and Information Regarding a Consumer's Interaction with an Internet Website, Application, or Advertisement

The **categories of sources** from which this information is collected are the Consumers directly, social networks, advertising networks, data analytics providers, and operating systems and platforms.

The **business or commercial purpose(s)** for which we collect this information are to process employment; qualify employees for licensure by government entities; and initiate and maintain benefits for employees.

The **categories of third parties** with whom we share this personal information are past employers.

#### Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information

The **categories of sources** from which this information is collected are the Consumers directly, social networks, advertising networks, data analytics providers, and operating systems and platforms.

The **business or commercial purpose(s)** for which we collect this information are to initiate and maintain benefits for employees; verify employment status; qualify employees for licensure by government entities; and review/perform services related to human resources and leave.

#### Professional or Employment-Related Information

The **categories of sources** from which this information is collected are the Consumers directly.

The **business or commercial purpose(s)** for which we collect this information are to conduct background checks; create/maintain employee files; verify employment status; initiate and maintain benefits for employees; process employment; qualify employees for licensure by government entities; and review/perform services related to human resources and/or leave.

The **categories of third parties** with whom we share this personal information are background screening companies, employee benefits providers, employment screening companies, financial service companies, healthcare management companies, healthcare providers, human resources providers, insurance companies, investment companies, legal compliance providers, past employers, payroll companies, and third party administrators.

#### Education Information

The **categories of sources** from which this information is collected are the Consumers directly.

The **business or commercial purpose(s)** for which we collect this information are to conduct background checks; process employment; create/maintain employee files; verify employment status; initiate and maintain benefits for employees; and review/perform services related to human resources.

The **categories of third parties** with whom we share this personal information are employee benefits providers and human resources providers.

**Disclose for a Business Purpose.** We have disclosed the following personal information about Consumers for business purpose(s) during the preceding 12 months:

Identifiers Such As a Real Name, Alias, Postal Address, Unique Personal Number, Online Identifier, Internet Protocol Address, Email Address, Account Name, Social Security Number, Driver's License number, Passport Number, or Other Similar Identifiers	Other Information that Identifies, Relates To, Describes, or is Capable of Being Associated with a Particular Individual (Personal Information Described in Subdivision (e) of Section 1798.80 of the California Civil Code other than Those Already Described in this Notice)	Characteristics of Protected Classifications Under California or Federal Law
Commercial Information, Including Records of Personal Property, Products or Services Purchased, Obtained, or Considered, or Other Purchasing or Consuming Histories or Tendencies	Internet or Other Electronic Network Activity Information, Including, But Not Limited To, Browsing History, Search History, and Information Regarding a Consumer's Interaction with an Internet Website, Application, or Advertisement	Geolocation Data
Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information	Professional or Employment-Related Information	Education Information

**Specific Pieces of Personal Information.** In order to determine the specific pieces of personal information collected about a Consumer, please submit a request through this website by clicking [here](#); to submit a request via telephone, please call 800-901-7977. We are not required to respond to requests more than two times in a 12-month period.

Each request requires the Consumer's name, postal address, and email address. Our verification process consists of matching these data points with the information we have collected. If these data points cannot be matched with the information we have collected, then we will state so in the response to a Consumer's request. We will communicate to you through your email address.

After submitting a request, you will be prompted to authenticate your email address within seven (7) days of submitting your request. If you do not authenticate your email address within seven (7) days of submitting your request, your request will not be considered.

**Selling Personal Information.** We do not sell personal information and have not sold any personal information about Consumers during the preceding 12 months. We do not and will not sell personal information.

**Consumers with Disabilities.** Consumers with disabilities may access this policy in an alternative format by calling 800-901-7977.

**Authorized Agent.** A Consumer can use an authorized agent to submit a request if the verification of the Consumer is confirmed and written permission is submitted to us expressly stating that the authorized agent has the authority to submit data requests on behalf of the Consumer. This can be accomplished by submitting a power of attorney pursuant to California Probate Code sections 4000 to 4465.

**Circumstances in Which We Are Not Required to Comply.** The obligations imposed on us by the California Consumer Privacy Act shall not restrict our ability to: (1) comply with federal, state, or local laws, (2) comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities, (3) cooperate with law enforcement agencies concerning conduct or activity that we, service provider, or third party reasonably and in good faith believes may violate federal, state, or local law; (4) exercise or defend legal claims, (5) collect, use, retain, sell, or disclose Consumer information that is deidentified or in the aggregate Consumer information, or (6) collect or sell a Consumer's personal information if every aspect of that commercial conduct takes place wholly outside of California.

### **Contacting Us**

You can access a printable version of this Notice by clicking [here](#). Please [contact us](#) with any questions, comments or concerns about this information.