

**Effective Date: July 25, 2024**

## **Privacy Policy**

### **Scope of this policy**

Jadex Inc. and its affiliates (collectively, "Jadex" or "we"), including Alltrista Plastics LLC, Artazn LLC, LifeMade Products LLC, and Shakespeare Company, LLC ("Shakespeare"), are committed to respecting your privacy and protecting personal data about you.

This privacy policy will inform you about how we collect and look after personal data (otherwise known as personal information) when you visit our websites, register and use our Shakespeare antenna mobile application (the "Comm Light App"), apply for a job with us, or when you submit a query. This policy also tells you about the rights you may have with respect to this personal data.

Whenever we collect information about you, we make decisions about how or why we process that personal data. We are responsible for ensuring that your personal data is used in accordance with data protection laws, to the extent they apply, such as the European Union's General Data Protection Regulation (GDPR) and the California Consumer Privacy Act (CCPA).

This privacy policy is provided in a layered format so you can click through to the specific areas set out below.

- [1. The controller](#)
- [2. Third-party links](#)
- [3. Changes to the privacy policy](#)
- [4. The data we collect and process about you](#)
- [5. How we collect your data](#)
- [6. How we use your personal data](#)
- [7. California residents](#)
- [8. Cookies](#)
- [9. Do Not Track signals](#)
- [10. Disclosures of your personal data](#)
- [11. International transfers](#)
- [12. Data security](#)
- [13. Data retention](#)
- [14. Your legal rights](#)
- [15. Children \(and Adolescents' Personal Data\)](#)
- [16. Contact us](#)

## 1. The controller

To the extent the GDPR applies, and for other data privacy laws with a data controller requirement, Jadex Inc. and its affiliates are the data controller that direct the purposes for which your personal data is processed. For a full list of Jadex affiliates for which this policy applies, [click here](#).

Jadex Inc. is located at: 1303 S. Batesville Road, Greer, SC 29650 (864-879-8100)

## 2. Third-party links

To the extent applicable, the websites covered by this policy may include links to third-party websites (including to those websites that allow you to purchase products or services bearing our various brands). Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control third-party websites and are not responsible for their privacy statements. When you leave our websites, we encourage you to read the privacy policy on every website you visit.

## 3. Changes to the privacy policy

We regularly review our privacy policy. Updated privacy policies will be made available through our websites or the Comm Light App, and we are working to make additional changes in light of new and revised privacy laws. The date at the top of this privacy policy indicates the date when the policy was last updated and the updates went into effect.

## 4. The data we collect and process about you

“**Personal data**”, (also referred to as “personal information” or “personally identifiable information” in some jurisdictions/regions), means any information from which a person is identifiable or from which that person can be identified. It does not include data where the person’s identity has been removed (anonymous or de-identified data), unless it still possible to identify the person from that data in combination with other data held by the data controller.

In the context of this privacy policy, “**processing**” means any activity relating to personal data, including by way of example, collection, storage, use, consultation, disclosure, sharing and transmission.

Depending on which websites you use, and your activity on those websites, we may collect, use, store and transfer different kinds of personal data about you, which we have categorized as follows:

- **Profile Data** includes your name, username and password (for the relevant website or for the Comm Light App), email address, mailing address, payment information, purchases or orders you make, and on-line or telephonic feedback.
- **Technical Data** includes your internet protocol (IP) address, browser type and language, Internet service provider or mobile carrier, referring and exit websites and applications, time

zone setting, location, browser plug-in types and versions, operating system and platform, and other technology identifiers on the devices you have used to access this website.

- **Usage Data** includes information about how you use our website, products, and services.

For users of the Comm Light App, we also collect precise geolocation information and your safety preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for various purposes. Aggregated Data may be derived from your personal data but is not considered personal data by law, as it will **not** directly or indirectly reveal your identity. For example, we may aggregate Usage Data to calculate the percentage of users who are accessing a specific website feature. However, if we combine or connect the Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data, which will be used in accordance with this privacy policy.

In relation to our customers, and for the purposes set out in this privacy policy, we do collect trade union membership and for users of the Comm Light App, precise geolocation; but we do not collect other types of **Special Categories of Personal Data** (also referred to as “sensitive information” in some jurisdictions/regions) about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, information about your health, and genetic and biometric data).

## 5. How we collect your data

We use different methods to collect data from and about you, including through:

- **Data you enter.** If you register with the Comm Light App, apply for a job, or submit a query, for example, we will collect the relevant information to receive and respond to that query or to evaluate your candidacy.
- **Automated technologies or interactions.** As you interact with our websites or the Comm Light App, we will automatically collect Technical Data about your equipment and software, and we log usage data, such as when you view or click on content, perform a search, share articles, or apply for jobs. As further described under “Cookies” below, we use cookies to recognize you and/or your device(s).
- **Third parties or publicly available sources.** We may receive data about you from third-party retailers who sell our products, primarily to enable us to ship products you have ordered through the third-party to you, or to fulfill legal or regulatory obligations.

## 6. How we use your personal data

The table below describes all the ways we plan to use your personal data, and (to the extent the GDPR applies) the legal bases we rely on to do so.

Information we collect	Why we collect it	Lawful basis for the processing
<p>If you place an order with us, register for the Comm Light App, we will collect the following Profile Data: your name, shipping and billing address, email address, telephone number, and payment information.</p>	<p>This information is necessary to provide you (or the company which you represent, where your order is on behalf a company) with the product you ordered, register you for the Comm Light App, or to take steps at your request prior to providing you with the product.</p>	<p>Where you are contracting with us on your own behalf: necessary for the performance of a contract or in order to take steps to enter into a contract.</p> <p>Where you are contracting with us as a representative of a company (e.g. your employer): necessary for our legitimate interests of taking and fulfilling orders from companies (which does not unfairly cause you prejudice or affect your fundamental rights and liberties because it is used to complete the purchase you have requested).</p>
<p>If you complete a warranty card, or ask us to provide warranty services, we will collect the following Profile Data: your name, address, telephone number, and email address, in addition to the product(s) you purchased and the date of purchase.</p>	<p>This information is necessary to register your product for the warranty or for us to provide warranty services.</p>	<p>Where you are contracting with us on your own behalf: necessary for the performance of a contract or in order to take steps to enter into a contract.</p> <p>Where you are contracting with us as a representative of a company (e.g. your employer): necessary for our legitimate interests of providing warranties to companies in relation to their purchases (which does not unfairly cause you prejudice or affect your fundamental rights and liberties because it is used to enable the company to register for the warranty).</p>
<p>If you contact us via one of our online forms, request or agree to receive electronic communications or mailings from us, we may collect the following Profile Data: your name, email, phone number, or physical address.</p>	<p>This information is necessary to send you the information you have requested.</p>	<p>Consent.</p>

<p>If you visit our website, register and use the Comm Light App, or interact with our electronic communications, we collect your IP address as well as electronic activity information about your use and interaction with our website, the Comm Light App or communications, and geolocation data.</p> <p>You can find more information on how we collect information in our <a href="#">Cookies Policy</a>.</p>	<p>This data is necessary for us to ensure the security and functionality of our website and related systems.</p> <p>Furthermore, this data is used to offer products and services that may be of interest to you (or the company whom you represent).</p>	<p>This is necessary for our legitimate interest of ensuring that our websites function and are secure for you to use (which does not unfairly cause you prejudice or affect your fundamental rights and liberties because it provides you with a functional and secure website).</p> <p>With respect to using this data to offer products and services that may be of interest to you:</p> <ul style="list-style-type: none"> <li>• when you are using the website on your own behalf: consent.</li> <li>• When you are using the website as a representative of a company (e.g. your employer): necessary for our legitimate interests of promoting our products/services to the company which you represent (which does not cause you unfair prejudice because it relates to offering goods/services to your company rather than to you as an individual)</li> </ul>
<p>If you apply for a job with us through our website, we will collect your name, address, telephone number, Social Security Number or other government identification, email address, employment and educational history, race, gender identity, veteran status, ancestry, and disability information.</p>	<p>This data is necessary to determine whether to extend an offer of employment. This data is also necessary to comply with our legal obligations (such as verifying the right to work).</p>	<p>Necessary in order to take steps prior to entering into an employment contract (or consent, if required for compliance with applicable data privacy laws).</p> <p>Necessary to comply with our legal obligations.</p>

<p>If you receive a conditional offer of employment from us, we may conduct a credit, drug and/or criminal history check, in accordance with and/or where permitted by local law.</p>	<p>This data is necessary to determine whether to confirm an employment offer.</p>	<p>Consent.</p>
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Where we rely on consent, depending on the applicable data protection/privacy law which applies, you have the right to withdraw your consent at any time by contacting us or by clicking on the “unsubscribe” link in marketing emails or text messages. Withdrawing consent will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you.

In cases where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you or the company whom you represent (for example, to provide you or the company whom you represent with goods or services). In such cases, we may have to cancel a product or service you or the company whom you represent have with us, but we will notify you at the time when this occurs.

Furthermore, where our processing of your personal data is necessary for our legitimate interests, depending on the applicable data protection/privacy law which applies, you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.

## 7. California residents

The personal data about you that we collect includes information within the below categories of data. These categories also represent the categories of personal data that we have collected over the past 12 months. Note that the categories listed below are defined by California state law. Inclusion of a category in the list below indicates only that, depending on the services and products we provide you, we may collect some information within that category. It does not necessarily mean that we collect all information listed in a particular category for all of our customers.

Note that we may share any of the below categories of information with our affiliates and service providers (see section 10 below). The source of this data comes either directly from you, through our service providers, or from third parties which carry our products and send certain information to us to fulfill the order. In the case of Internet or other electronic network activity information, we gather that information via automated means.

Category	Purpose of processing
Identifiers such as 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.	A subset of this data is processed in connection with a number of our operational functions, including to take and deliver orders, to register for and use the Comm Light App, to respond to your queries, and to service our warranties. It may also be used for marketing purposes, including offering you products that may interest you.
Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, your 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, medical information, or health insurance information.	A subset of this data is processed in connection with a number of our operational functions, including to take and deliver orders and to service our warranties to register and use the Comm Light App. It may also be used for marketing purposes, including offering you products that may interest you.
Characteristics of classes protected under federal or California law, including: familial status, disability, sex, national origin, religion, color, race, sexual orientation, gender identity and gender expression, marital status, veteran status, medical condition, ancestry, source of income, age, or genetic information.	This information is collected and processed where required by law or, if you are an applicant, to provide you with specific benefits or accommodations you may elect to receive.
Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	A subset of this data is processed in connection with a number of our operational functions, including to take and deliver orders and to service our warranties. It may also be used for marketing purposes, including offering you products that may interest you.
Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding	This data is processed in order to optimize performance of our websites and/or the Comm Light App.

a consumer's interaction with an Internet Web site, application, or advertisement.	It is also processed to detect security incidents, protect against malicious, deceptive, fraudulent or illegal activity, and for data analytics.
Audio, electronic, visual, thermal, olfactory, or similar information.	This data is processed in connection with a number of our operational functions, including recording sales calls and other calls.
Professional or employment-related information.	A subset of this data is processed in connection with a number of our operational functions, including to take and deliver orders and to service our warranties. It may also be used for marketing purposes, including offering you products that may interest you.

## 8. Cookies

To learn more about our Cookies Policy, [click here](#).

## 9. Do Not Track signals

Some browsers have incorporated "Do Not Track" (DNT) features that can send a signal to the websites you visit indicating you do not wish to be tracked. Because there is not yet a common understanding of how to interpret the DNT signal, our services do not currently respond to browser DNT signals. For more information on DNT, see <https://allaboutdnt.com/>.

## 10. Disclosures of your personal data

We may disclose your personal data to our affiliated companies, when required by law, or to our service providers (e.g., when necessary for the administration and maintenance of our IT systems). Where you are have provided us with your personal data in your capacity as a representative of a company, we may disclose your personal data to that company. We require our service providers to provide written assurances regarding the security and privacy protections they have in place to protect any personal data transferred or disclosed to them, as well as their compliance with our security requirements and any applicable laws and regulations.

The third parties we may share your personal data with include:

- third-party service providers (for example, administration and maintenance of IT systems, payments providers, email marketing services providers) ;
- regulatory authorities;



- other companies in relation to managing the proposed sale, restructuring, transfer or merging of any or all part(s) of our business, including to respond to queries from the prospective buyer or merging organisation; and
- our auditors and legal advisors.

## **11. International transfers**

Consistent with applicable data protection regulations, we may share personal data with our affiliates or other third parties, as detailed in paragraph 10. This means that your personal data processed in relation to this privacy policy may be stored and processed outside of your home country (and/or region), including in countries/regions that may not offer the same level of protection for your personal data as your home country (where you are an EU resident, this includes the processing of your personal data outside of the EU, including but not limited to the United States). Some of the countries and regions where your personal data may be processed include: the U.K.

Where transfers from the U.K. or E.U. to the United States take place (or to any other country outside of the E.U.), or when we engage in a follow-on transfer from such country, we will use an appropriate legal mechanism, including (but not limited to) the EU Standard Contractual Clauses (or relevant exemptions where applicable under data protection regulations).

## **12. Data security**

We have put in place security measures (which will include, where relevant, those required by applicable law) to try to protect against your personal data processed in relation to this privacy policy from being accidentally lost, used or accessed in an unauthorized way, altered, or disclosed. In addition, we limit access to your personal data to employees, agents, contractors, and other staff who need to know for business purposes. They will only process your personal data processed in relation to this privacy policy according to our instructions and they are subject to the duty of confidentiality.

We have put in place procedures to deal with any suspected personal data security breach, and we will notify you and any applicable regulators of such a breach where we are legally required to do so.

## **13. Data retention**

We will only retain your personal data for as long as is reasonably necessary to fulfil the purposes that we process it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements. We may retain your personal data for a longer period in the event of a complaint, or if we reasonably believe there is a prospect of litigation with respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from the unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those

purposes through other means, and the applicable legal, regulatory, tax, accounting, or other requirements.

In some circumstances, we will anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without providing further notice to you.

## **14. Your rights**

In certain circumstances, the following rights may be available to you, depending on your jurisdiction or depending on the jurisdiction in which the data was collected, including the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you.
- **Request the correction** of the personal data that we hold about you. This enables you to have any incomplete, out-of-date, irrelevant, misleading, or inaccurate data we hold about you corrected.
- **Request the erasure** of your personal data. This enables you to ask us to delete or remove personal data. Note, however, that we may not always be able to comply with your request (for example, we cannot erase information if we are required to keep it for regulatory purposes or to fulfill an order you have placed).
- **Restrict or object to the processing** of your personal data when we are relying on a legitimate interest, and there is something about your particular situation which makes you want to object to the processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Data portability.** In some instances, you may have the right to receive the information about you in a portable and readily usable format.
- **Withdraw your consent.**
- **Opt-out of the sale of personal data.** For purposes of California law, we do not sell your personal information to third parties, nor do we intend to, as those terms are defined in the CCPA. We also have not done so for the last 12 months. In addition, we have contracts with our service providers to prohibit any sale of the personal information we provide them.

You will not have to pay a fee to access your personal data (or to exercise any of your other rights). However, where permitted under applicable privacy laws, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances. If we refuse to give you access to your personal data, we will give you a written notice (if

required to do so by applicable privacy laws) setting out the reasons for our decision (except where it would be unreasonable for us to do so) and any mechanisms that are available to you to complain about the refusal.

We will not discriminate against you in any way for exercising your rights.

Please note that under California law, we are only obligated to respond to personal information requests from the same consumer up to two times in a 12-month period. In addition, under California law, and for the protection of your personal information, we may be limited in what personal information we can disclose. Furthermore, if you are a representative of a commercial entity, you may be entitled to these rights effective January 1, 2021.

Depending on the applicable data protection/privacy law which applies, you may also have the right to lodge a complaint with local state regulators/data protection authorities – please see paragraph 16.

Where required to do so by applicable privacy laws, we will inform (promptly) the entities with whom we have a shared use of your data about the correction, deletion, anonymization or blocking of your personal data, so that they may repeat the same procedures, except in cases where this communication is demonstrably impossible or involves disproportionate effort.

#### What we may need from you

We may need to request specific information from you to help us verify your identity and ensure your right to access your personal data (or to exercise any of your other rights). Where applicable, this is a security measure to ensure that the personal data is not disclosed to any person who has no right to receive it. For example, we may verify the email address we have on file with the email address from which you are sending a request. We may also ask you to verify certain past orders, or to confirm your last four digits on a card you recently used to place an order. If you have an account with us, we may ask you to verify yourself by logging in. We may also contact you to ask you for further information in relation to your request, in order to speed up our response.

If you would like to appoint an authorized agent to make a request on your behalf, you must provide the agent with written, signed permission to submit privacy right requests on your behalf, or provide a letter from your attorney. The agent or attorney must provide this authorization at the time of request. Note that we may require you to verify your identity with us directly before we provide any requested information to your approved agent.

Information collected for purposes of verifying your request will only be used for verification.

#### How to submit an access or delete request

If you would like to request access to your personal information or to have us delete personal information, please submit the request through our webform, or contact us via the methods indicated below.

## **15.Children**

These websites are not intended for use by children, and we do not knowingly collect data relating to children under the age of 16 (in relation to the processing of personal data detailed in this privacy policy).

## **16.Contact us**

If you have any questions about this privacy policy or our privacy practices, please call us at 864-879-8100 or email us at [Mark.Rosebrock@Jadexinc.com](mailto:Mark.Rosebrock@Jadexinc.com).

If you are contacting us to complain about an alleged breach of this privacy policy or our privacy obligations at law, please provide us with as much detail as possible in relation to your complaint. We will take any privacy complaint seriously and any complaint will be assessed with the aim of resolving it in a timely and efficient manner. We request that you cooperate with us during this process and provide us with any information that we may need.

Without prejudice to any other administrative or judicial remedy you might have, you may have the right to lodge a complaint with local state regulators/data protection authorities if you believe that we have infringed applicable privacy or data protection requirements when processing personal data about you.

The appropriate data protection authority in the United Kingdom is:

The Information Commissioner's Office

Water Lane, Wycliffe House

Wilmslow – Cheshire SK9 5AF

Telephone: +44 1625 545 745

E-mail: [international.team@ico.org.uk](mailto:international.team@ico.org.uk)

Website: <https://ico.org.uk>

