

Liberty Diversified International, Inc.

Privacy Notice for California Residents

Last updated: December 21, 2022

This **Privacy Notice for California Residents** (“Notice”) supplements the information contained in Liberty Diversified International Inc., its subsidiaries and affiliates’ (collectively, “we” or “LDI”) Website Privacy Policy and applies solely to all visitors, users, and others who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act (“CCPA”) and any terms defined in the CCPA have the same meaning when used in this notice. This policy applies to the personal information we collect from California residents who use our Websites (LibertyDiversified.com; LibertyPackagingInc.com; LibertyPaper.com; DreamworksCoatingSolutions.com; Quarrix.com; LibertyPlasticsInc.com; SafcoProducts.com), communicate or request information from us, or otherwise interact with us. This Notice does not apply to personal information that is provided to or collected through use of the LDI application or from job applicants. This Notice explains our collection, processing, and disclosure of “personal information” relating to California consumers. Specifically, this Notice applies to our processing activity when we are acting as a “business” under the CCPA - meaning that we control the purposes and means of processing your personal information.

Some of the personal information we collect may be exempt from some or all of the requirements under the CCPA. We may also receive your information in our capacity as a service provider to our customers or partners; in which case, any questions you have relating to your personal information and your rights under California law should be directed to our customer or partners that you have a relationship with.

Please read this Notice carefully before sharing information with us so you understand our practices regarding your information.

Information We Collect and Disclose

As defined by the CCPA, “personal information” includes any information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device. Personal information does not include information that is:

- Lawfully made available from government records;
- We have a reasonable basis to believe is lawfully made available to the general public by the consumer or from widely distributed media, or by the consumer;
- Made available by a person to whom the consumer has disclosed the information if the consumer has not restricted the information to a specific audience;
- Lawfully obtained, truthful information that is a matter of public concern;

- Deidentified or aggregate consumer information; or
- Information excluded from the CCPA’s scope, including personal information covered by certain sector-specific privacy laws such as the Fair Credit Reporting Act.

In the past 12 months, LDI has collected the following categories of personal information from consumers and disclosed such information to the following categories of third parties for business purposes.

Category	Examples	Categories of Third Parties to Whom Disclosed
Identifiers.	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.	<ul style="list-style-type: none"> • IT and cloud/hosting service providers, such as our email providers, business application providers, managed services providers, and IT consultants • Online analytics and marketing/advertising service providers • Professional advisors (accountants, lawyers, consultants, and auditors)
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	<p>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, medical information, or health insurance information.</p> <p>Some personal information included in this category may overlap with other categories.</p>	<ul style="list-style-type: none"> • IT and cloud/hosting service providers, such as our email providers, business application providers, managed services providers, and IT consultants • Online analytics and marketing/advertising service providers • Professional advisors (accountants, lawyers, consultants, and auditors)
Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	<ul style="list-style-type: none"> • IT and cloud/hosting service providers, such as our email providers, business application providers, managed services providers, and IT consultants

		<ul style="list-style-type: none"> • Online analytics and marketing/advertising service providers • Professional advisors (accountants, lawyers, consultants, and auditors)
Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	<ul style="list-style-type: none"> • IT and cloud/hosting service providers • Online analytics and marketing/advertising service providers
Geolocation data.	Physical location or movements.	<ul style="list-style-type: none"> • IT and cloud/hosting service providers • Online analytics and marketing/advertising service providers

Please note that we may also use, disclose, or transfer your information in connection with the sale, merger, dissolution, restructuring, divestiture, or acquisition of our company or its assets. We may also disclose your personal information in response to a court order, subpoena, search warrant, law, or regulation.

How We Collect Your Information

- **Direct collection:** We collect information directly from you when you choose to provide it to us by filling out forms on our website, engaging in transactions with us, signing up to receive promotional or information communications from us, using our services, communicating with us about our services, or otherwise directly providing the information to us.
- **Indirect and technology-based collection:** We also collect certain information from you indirectly when you visit, use, or navigate our website or mobile application. LDI collects certain identifiers (such as IP addresses) and internet and similar network activity (such as website usage data) from you indirectly using cookie, pixels, and passive tracking technologies, as described in our Privacy Policy.
- **Collection via social media:** We may collect personal data about social media users, including basic user profile information (such as username), user-generated content (such as posts, comments, pages, profiles, or feeds) and associated metadata (such as time and location of a post or comment); contact details (such as name, email address, telephone number if made public by the user); and additional individual information published by the user (such as employer, profession, age, location, education information, habits, etc.). The type and scope of personal data obtained from social media platforms depends on the type of APIs and permissions set out by the respective platforms and the administrative permissions granted by individuals, where applicable.

- Third-party collection: From time-to-time, we may obtain marketing or lead lists from third party vendors. We use these, for example, to send you marketing communications.

Sensitive Personal Information

LDI does not collect “sensitive personal information” (as defined by the CCPA) for the purposes of inferring characteristics about California consumers. Accordingly, LDI treats any such information as “personal information” consistent with applicable provisions of the CCPA.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business or commercial purposes (as well as any other purposes as set forth in our Privacy Policy):

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a price quote or ask a question about our products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a product or service, we will use that information to process your payment and facilitate delivery. We may also save your information to facilitate new product orders or process returns.
- To communicate with you and respond to your inquiries about our services and products, including to provide you with promotional and informational communications regarding our services, informing you about new services and products, updating you about changes to our services and products, and investigating any concerns you may have.
- To provide, support, personalize, and develop our Website, products, and services.
- To create, maintain, customize, and secure your account with us.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your Website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Website, third-party sites, and via email or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our Website, products, and services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To enforce our agreements and comply with our legal or regulatory obligations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of LDI's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by LDI about our Website users is among the assets transferred.

Applicable Retention Periods

For each category of personal information identified above, LDI will only retain such information only for as long as necessary to fulfill your requests or the purposes for which it was obtained, as set forth in this Notice. The criteria used to determine our retention periods include (i) for as long as we have an ongoing relationship with you, (ii) as required by a legal obligation to which we are subject, and (iii) as necessary to resolve any disputes or enforce our legal agreements with you.

Sale or Sharing of Personal Information

In the past 12 months, LDI has not “sold” any categories of personal information or “shared” any such information for the purposes of cross-context behavioral advertising. Likewise, LDI does not have actual knowledge of any sales or sharing of personal information regarding minors under 16 years of age.

Your Rights Under the CCPA

The CCPA provides California residents with the rights discussed below. For convenience, and as required by the CCPA, we explain how you can exercise those rights, to the extent they are applicable.

1. Right to Request Information

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months (the "right to know"). Specifically, you may request that we disclose:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting your personal information.
- The categories of third parties with whom we disclose your personal information.
- The specific pieces of personal information we collected about you.
- If we disclosed your personal information for a business purpose, the categories of personal information received by each category of third party.

- 2. Right to Data Portability.*** You have the right to request that we provide copies of the specific pieces of personal information we collected about you. If a verifiable consumer request is made, and subject to any exceptions or limitations under the CCPA, we will take steps to deliver the personal information to you either by mail or electronically. If we provide the information to you electronically, it will be in a portable and readily useable format, to the extent technically feasible. Consistent with the CCPA and our interest in the security of your personal information, we will describe but may not provide copies of certain personal information we may receive from you (e.g., driver's license number, other government-issued identification number, financial account

number, health or medical identification number, account password, or security questions or answers) in response to a CCPA request, to the extent any of those items are in our possession.

3. ***Right to Request Deletion.*** You have the right to request that we delete personal information we collected from you, subject to any exceptions or limitations under the CCPA.
4. ***Right to Correct Inaccurate Information.*** If we maintain inaccurate personal information about you, you have the right to request that we correct that inaccurate personal information, taking into account the nature of the personal information and the purposes of the processing of the personal information.
5. ***Right to Opt-Out.*** Consumers in California have the right to opt-out of (1) the sharing of their personal information for the purposes of cross-context behavioral advertising (as defined in the CCPA), or (2) the sale of personal information. Because LDI does not process “sell” or “share” personal information, these rights are not available.

Exercising Your Rights

To exercise the rights described above, you – or someone authorized to act on your behalf – must submit a verifiable consumer request to us by either:

- Calling us at 1-800-421-1270.
- Emailing legal@libertydiversified.com with the subject line: “CCPA Request.”

Your request must include your name, email address, mailing address, phone number, the nature of your inquiry and the context in which we may have received your information. If you are an agent submitting a request on behalf of a consumer, we may request that you submit a signed permission from the consumer authorizing you to make the request.

In order to protect the privacy and data security of consumers, the verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative of such consumer; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

As indicated above, please be aware that the CCPA provides certain limitations and exceptions to the foregoing rights, which may result in us denying or limiting our response to your request.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. We will only use personal information provided in a verifiable consumer request to verify the requestor’s identity or authority to make the request. We may also request that you provide additional information if needed to verify your identity or authority to make the request. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you or the consumer on whose behalf you are making the request.

Response Timing and Format

The CCPA requires us to respond to a verifiable consumer request within forty-five (45) days of its receipt; however, we may extend that period by an additional 45 days. If we require more time, we will inform you of the reason and extension period in writing. We will deliver our written response via e-mail.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

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.

Our Commitment Not to Discriminate

Consistent with the CCPA, we will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Changes to this Notice

LDI reserves the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the "Last Updated" date at the top of this document. **Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.** Please check this page periodically for updates.

Data Sharing or Direct Marketing Purposes

California Civil Code § 1798.83 (California's Shine the Light Act) further permits California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. If you are a California resident, you may ask us to refrain from sharing your personal information with certain of our affiliates and other third parties for their marketing purposes. Please tell us your preference by contacting us at the contact information below.

Contact Information

If you have any questions or comments about this Notice, please contact us using the following information:

Phone: 1-800-421-1270

Email: legal@libertydiversified.com

Postal Address:

Liberty Diversified International, Inc.

Attn: Legal Department

5600 North Highway 169

Minneapolis, MN 55428

If you need to access this Policy in an alternative format due to having a disability, please contact legal@libertydiversified.com or 1-800-421-1270.

Effective Date: January 1, 2020