

COASTAL PACIFIC PRIVACY POLICY

Last Updated: 6-1-2020

Coastal Pacific Food Distributors (“Company,” “we,” “our,” or “us”) takes your privacy seriously. We want you to know how we collect, use, share, and protect your Personal Information. If you are a California resident, please refer to **Your California Privacy Rights** section below.

SOME HELPFUL TERMS

“Personal Information” is any information that can be used to identify you, either alone or in combination with other information. Examples of Personal Information include, name, email address, phone number and broker representative.

“Cookies” are text files, typically small in size, that are placed on your computer by a webpage server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookies to you. There are different type of cookies and some cookies may be necessary for the website to run properly. Coastal Pacific does not currently use cookies.

“Aggregate Information” is information that has been combined with information about other users and analyzed or evaluated as a whole, such that no specific individual may be reasonably identified. For example, Aggregate Information may include a statement that says “50% of our users have visited our website in the last month”.

HOW WE MAY COLLECT AND USE YOUR PERSONAL INFORMATION

We collect your Personal Information when we deliver our services, conduct marketing activities, gather feedback, provide customer support, and run our business operations. The Personal Information we collect varies based upon whether you are using our website, our services, purchasing our products or participating in surveys and providing feedback.

For the information that you provide to us during sign up or when you set up an account or profile, sign-up to receive our email, or otherwise use our services, we may collect information such as your name, email address, mailing address, phone number, broker representative or other information that may help us better service you.

We currently do not collect the following information but may do so in the future:

- Device-specific information when you visit our website such as your internet protocol address.
- Location information. We may collect and process information about your geographic location through the use of Google Analytics. However, this information is in aggregate form and we would not know your exact geographic location.
- Information we collect when you receive our services that may be associated with your account. When information is associated with your account, we will treat it as Personal Information.

In addition to the purposes listed above, we may also use your Personal Information to:

- **Communicate with you.** Obtain your name for purposes of communicating with you and identifying you as a user of the website or our services.
- **Verify your identity.** We may use your Personal Information to verify who you are. For example, we may verify your phone number in order to use our website or services.
- **Respond to your questions and fulfill your requests.** We may send you communications upon your request or otherwise with your consent.
- **Provide support and receive feedback.** We may request Personal Information in order to provide support to you. We may also collect Personal Information that are associated with your feedback.
- **Process your transactions.** We may use your Personal Information that you provide to us in the process of making a purchase to process your payment and provide our products and services.

We may also gather non-descriptive, non-identifiable statistical information about how many visitors use our services, how our users use the services, how our users access certain content available on our websites and social media pages, how long our users access certain content, what content our users are accessing, and our user preferences or settings for certain services. We use this Aggregated Information for statistical analysis of how users make use of the services so we can better improve our services.

DATA COLLECTION TECHNOLOGIES

We currently do not use, but may in the future use, Cookies, Web Beacons, and other data collection technologies (together, “Data Collection Technologies”) to provide you with a better experience when you use the services. Data Collection Technologies help you log onto the services, remember your settings and preferences, help us keep your information safe and secure. While the Data Collection Technologies we use may change from time to time, they generally fall into the following categories:

- **Authentication.** Cookies are used to verify your account and determine when you’re logged in so that it can be made easier for you to access the services and show you the appropriate experience and features.
- **Security and product integrity.** Cookies may be used to help us keep your account and information safe and secure or to combat activity that violates our policies or otherwise degrades our ability to provide our services.
- **Site features and services.** Cookies may be used to enable the functionality that helps us provide the services and provide you with the best experience possible, including to help provide you with content relevant to your locale.
- **Analytics and research:** Cookies may be used to better understand how people use the website so that services can be improved. For example, companies partner with Google Analytics, which uses Cookies to track your interactions with company services. Google then collects that information and reports it, without identifying individual users. This information helps improve services. For more information on Google Analytics, visit <https://support.google.com/analytics>.

Although most browsers and devices accept Cookies and other Data Collection Technologies by default, their settings usually allow you to clear or decline Cookies.

Please note: Some web browsers incorporate a “Do Not Track” feature (DNT) that signals to the websites that you visit that you do not want to have your online activity tracked. Many websites and applications, including our Services, do not currently respond to web browser DNT signals because such signals are not yet uniform. For more information about DNT signals, please visit <http://allaboutdnt.com>.

SHARING YOUR PERSONAL INFORMATION

Because we know your Personal Information is important to you, we may share your information for the reason(s) disclosed to you at the time we collect it, with your consent, as well as in the following ways:

- **At your direction.** We will share your information with third parties if and when you direct us to. For example, you may ask us to share your Personal Information when you wish to interact with other users.
- **With our Vendors.** We may share your Personal Information with our Vendors such as 3rd party logistics providers, as necessary to enable them to provide services to us. Vendors are third parties (other companies and individuals) that support the operation and maintenance of our services.
- **With our commonly owned entities.** We may share your Personal Information with other companies under common ownership and control of Coastal Pacific Food Distributors, Inc. which may include our subsidiaries. We do this in order to provide you better service and improve your experience.
- **For legal purposes.** We may share your Personal Information as reasonably necessary to comply with law, legal process (including a court or government order or subpoena), and to meet our insurance obligations, to detect, prevent, or otherwise address fraud, security or technical issues, to enforce this Privacy Policy, and to protect the rights, property or safety of Company, our users, and/or the public.
- **During a corporate transaction.** If Company is involved in a merger, acquisition, financing, or sale of business or assets, information collected from and about users may be transferred to one or more third parties involved in such transaction and, upon such transfer, the relevant third party privacy policy or policies may govern further use of the information.

YOUR CHOICES

Your preferences about how we use your information are important to us and, when possible, we aim to honor them. We offer the following choices that you can exercise with regard to your Personal Information.

- **Access, modify, or delete your Personal Information.** You can contact us at any time to request to access, modify, or delete the Personal Information we possess about you. Please refer to the “Contact Us” section below.
- **Managing Cookies and Other Data Collection Technologies.** You have a number of options to control or limit how we and our vendors use Cookies and other Data Collection Technologies including for advertising:

- To prevent location information from being collected by us at any time, you can turn off your device's location-tracking functionality.
- To prevent your data from being used by Google Analytics, you can install Google's opt-out browser add-on.
- To opt out of interest-based advertising, you can visit <http://optout.networkadvertising.org/#/> and follow NAI's on-screen instructions. Note that if you opt out through the NAI, you will still receive advertising, but the advertising will not be tailored to your interests. In addition, if you opt out through NAI and later delete your Cookies, use a different browser, or buy a new device, you will need to opt out of interest-based advertising again.
- To opt out of ads on Facebook or Google that are targeted to your interests, use your Facebook or Google Ads settings.
- Check your mobile device for settings that control ads based on your interactions with the applications on your device. For example, on your iOS device, enable the "Limit Ad Tracking" setting, and on your Android device, enable the "Opt out of Ads Personalization" setting.

PROTECTING YOUR PERSONAL INFORMATION

We use reasonable organizational and technical security measures designed to preserve the security of your Personal Information, including without limitation, encryption technologies and authentication tools. Note, however, that no data transmitted over the Internet is 100% secure and any information disclosed online can potentially be collected and used by parties other than the intended recipient. As a result, while we strive to protect your information, we cannot guarantee or warrant the security of any information you transmit to or from our services.

CHILDREN'S PRIVACY

We respect the privacy of children. Our services are not designed to attract an audience younger than 16, and we do not knowingly collect Personal Information from children under 16. Please contact us using the contact details below if you believe we may have collected information from your child, and we will work to delete it.

YOUR CALIFORNIA PRIVACY RIGHTS

This section of the Privacy Statement applies only if you reside in the state of California in the United States ("California Consumer"). This section applies to all Personal Information of California Consumers that Coastal Pacific Food Distributor collects both online and offline, including through California Consumers' (a) visits to our website, and (b) use of our services that references this Privacy Policy.

This Privacy Policy addresses the following topics

- The Scope of this Privacy Policy
- The Company's Collection, Use and Disclosure of Personal Information
- Your California Privacy Rights
- How to Exercise Your Rights
- Additional Rights Under California Law
- Changes to This California Privacy Policy
- For More Information

Assistance For The Disabled

Alternative formats of this Privacy Statement are available to individuals with a disability. Please contact us at info@cpfd.com for assistance.

The Scope Of This Privacy Policy

What Is Personal Information?

“Personal Information”. “Personal Information” means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California Consumer or household.

Whose Personal Information Is Covered By This Policy?

This California Privacy Policy applies to the Personal Information of residents of the State of California in their capacity as consumers (“California Consumers”).

What Personal Information Does This Privacy Policy Cover?

This Privacy Policy applies to all Personal Information of California Consumers that we collect both online and offline, including through California Consumers’ (a) visits to our website; (b) emails; and (d) use of our products and services that references this Privacy Policy (collectively, the “Services”).

Whose Personal Information Is Not Covered By This Privacy Policy?

For purposes of this Privacy Policy, “Consumer” does not include:

- Individuals who are NOT California residents.
- California residents who are Company’s employees, job applicants, or contract workers (collectively, “HR Individuals”), or the emergency contacts of HR Individuals or the dependents or spouses who receive Company benefits by virtue of their relationship to an HR Individual in their capacities as HR Individuals or emergency contacts, dependents, or spouses; or
- California residents who are employees or other agents of a business engaged in a transaction with Company in their capacities as employees or agents of that business.

The Company’s Collection, Use And Disclosure Of Personal Information

This section of the Privacy Policy describes, for the 12 months preceding the date last updated, above, (a) the categories of Personal Information we have collected about you, (b) the sources of that Personal Information, (c) the business and commercial purposes for use, and (d) the categories of third party recipients of your Personal Information. Unless we inform you otherwise, this section also serves as our “**Notice at Collection**” by informing you of your Personal Information to be collected in the future and the purposes for its use.

Categories Of Personal Information Collected

In the last 12 months, Company collected the following categories of Personal Information about California Consumers:

- **Identifiers**, including: real name, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, phone number,
- **Commercial information**, including: products and services purchased; service date, price.
- **Internet or other electronic network activity information**, including: device information from connection with WiFi
- **Sensory information**, such as video surveillance on facility premises
- **Geolocation information**, for example, GPS based location tracking - None
- **Financial Information**: payment information and company bank account information used for ACH or wire transfers

Sources Of Personal Information and Purposes For Using Personal Information

In the last 12 months, Company collected the categories of Personal Information listed above from the following sources: (1) Customers; and (2) Website Users, and used those categories of Personal Information for the following purposes:

Categories of Personal Information Collected in the Last 12 Months	Sources of that Personal Information	Business Purposes and Commercial Purposes for Collecting that Personal Information
Identifiers such as name, company name, e-mail address, phone # and company address	From: (1) California Consumers; (2) Website Users	<ul style="list-style-type: none"> • Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting impressions to unique visitors, verifying positioning and quality of impressions, and auditing compliance with the law. • Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity. • Debugging to identify and repair errors that impair existing intended functionality. • Short-term, transient use. • Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, and providing analytic services.

Categories of Personal Information Collected in the Last 12 Months	Sources of that Personal Information	Business Purposes and Commercial Purposes for Collecting that Personal Information
		<ul style="list-style-type: none"> • Undertaking internal research for technological development and demonstration. • Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by Company, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by Company. • Product and service training, for example, by providing training and information on using, servicing, selling, and displaying Company's products and services. • Facilitating communications, for example, by collecting and organizing contact information, establishing means of communications, and communicating with current and prospective customers, including regarding questions and feedback.
Commercial information	From: (1) California Consumers; (2) Website Users	The purposes listed for "Identifiers" above
Biometric information	From: (1) California Consumers	Facility On-Site Temperature scanning: Temperature information is collected but not stored or distributed
Internet or other electronic network activity information	Automated technologies in the website	The purposes listed for "Identifiers" above
Geolocation data	(2) Website Users	Currently not being collected though may be collected in the future for the purposes listed for "Identifiers" above
Sensory information	Video surveillance onsite	The purposes listed for "Identifiers" above
Professional or employment-related information such as contact names of employers, e-mail addresses, work addresses	Prospective client contact is the source	The purposes listed for "Identifiers" above

Disclosure Of Personal Information To Third Parties

In the last 12 months, Company disclosed the following categories of Personal Information about California Consumers to the following categories of third parties for a business or commercial purpose:

Category of Personal Information	Categories of Third Parties with Whom We Disclose Categories of Personal Information for a Business Purpose in the Last 12 Months
Identifiers	<ul style="list-style-type: none"> • 3rd party Logistics/Trucking service providers and providers of Data Collection Technologies, providers of data analytics services, website providers, and e-commerce vendors • Government agencies, law enforcement, and other parties as required by law, including in litigation
Commercial Information	<ul style="list-style-type: none"> • 3rd party Logistics/Trucking service providers
Biometric Information	<ul style="list-style-type: none"> • None
Internet or Other Electronic Network Activity Information	<ul style="list-style-type: none"> • providers of data analytics services, website providers, and e-commerce vendors
Geolocation Information	<ul style="list-style-type: none"> • None
Sensory Information (On-premises Video surveillance)	3 rd party security service providers

No Sale Of Personal Information

The Company does not and will not sell California Consumers' Personal Information.

YOUR CALIFORNIA PRIVACY RIGHTS

a) Right to Know

California Consumers have the right to submit a verifiable request to know:

- The categories and specific pieces of Personal Information that Company has collected about them;
- The categories of sources from which Company collected the Personal Information;
- The categories of Personal Information that Company sold or disclosed to a third party (other than a service provider) for a business purpose and the categories of recipients of that information; and
- The business or commercial purposes for Company's collection, disclosure, or sale of the Personal Information.

b) Right To Delete

- California Consumers have the right to submit a verifiable request for deletion of their Personal Information that Company has collected from the Consumer.
- c) Right to Opt Out of Sale of Personal Information
- California Consumers have a right to opt-out of the sale of the Personal Information. However, as stated above, Company does not and will not sell Personal Information.

HOW TO EXERCISE YOUR RIGHTS

a) Making Requests

Company will respond to requests in accordance with applicable law if it can verify the identity of the individual submitting the request. California Consumers can exercise their rights in the following ways:

- a) Complete the online request form available here: [CCPA Consumer Request Form](#)
- b) Contact by telephone: 800 500-2611, x1113

b) Requests By Authorized Agents

You can have an authorized agent submit a CCPA request to us on your behalf by (a) providing us with a written authorization signed by you that designates the agent as your authorized agent for purposes of a CCPA request; (b) verifying your identity directly with us; and (c) directly confirming with us that the agent is authorized to submit the request.

c) How We Will Verify Your Requests

To prevent anyone other than you, or your authorized agent, from exercising the right to know or the right to delete with respect to your personal information, we follow procedures to verify your, or your agent's, identity. This process seeks to confirm that the person making a request is the person about whom we have collected personal information or that person's authorized agent. The verification process involves matching data points that you provide with your request against information about you we already have in our records and that we have determined to be reliable for purposes of verifying your identity. We will use information you provide in your completed request form to verify your identity, and we may request additional information if necessary to complete the verification process.

5. ADDITIONAL RIGHTS UNDER CALIFORNIA LAW

a) The Company's Non-Discrimination Policy

California Consumers have the right not to be subject to discriminatory treatment by Company for exercising their privacy rights under the California Consumer Privacy Act, and Company will not discriminate on that basis. However, Company may charge a California Consumer a different price or rate or provide a different level or quality of goods or services if the difference is reasonably related to the value provided to the California Consumer by the Consumer's Personal Information. If Company does so, it will provide Consumers with any legally required notice.

b) Your 'Do Not Track' Browser Setting

The Site does not collect personally identifiable information about your online activities over time and across third-party websites or online services. We support the Do Not Track (DNT) browser setting. DNT is a preference you can set in your browser's settings to let the websites you visit, including the Site, know that you do not want the sites collecting your personally identifiable information. We do not allow other parties to collect personally identifiable information about an individual's online activities over time and across different Web sites when an individual uses our web site. For example, our Company's websites do not allow third parties to place cookies on the user's computer and then track that user over time or across different websites.

Third-Party Links And Services

We provide links to third party websites operated by organizations not affiliated with Company. We do not disclose your Personal Information to organizations operating such linked third-party websites. We do not review or endorse, and are not responsible for, the privacy practices of these organizations. We encourage you to read the privacy policy of each and every website that you visit. This Privacy Policy applies solely to information collected by Company through the Services.

Minors Under 16 Years of Age

We respect the privacy of children. Our Services are not designed to attract an audience younger than sixteen (16), and we do not knowingly collect Personal Information from children under sixteen (16). If you are under the age of sixteen (16), you are not permitted to use our Services and should not send any information about yourself to us through the Services. Please contact us using the contact details below if you believe we may have collected information from your child under the age of sixteen (16), and we will work to delete it.

6. CHANGES TO THIS PRIVACY POLICY

If we change this Privacy Policy, we will post those changes on this page and update the Privacy Policy modification date above. If we materially change this Privacy Policy in a way that affects how we use or disclose your personal data, we will provide a prominent notice of such changes and the effective date of the changes before making them.

7. FOR MORE INFORMATION

For questions or concerns about Company's privacy policies and practices, please contact us at info@cpfd.com