

# PRIVACY POLICY

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Distribution Management, Inc. (DM) is committed to protecting the privacy of your information. This Privacy Policy describes our web site and platform privacy practices (“Privacy Policy”). This Privacy Policy applies to data collected by Distribution Management and its subsidiaries (hereinafter collectively referred to as the “Company,” “we,” “us,” or “our”) through our web site. DM complies with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States. DM has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

The Federal Trade Commission (FTC) has jurisdiction over DM’s compliance with the Privacy Shield.

By voluntarily using a DM Site and/or providing data or other information via a DM Site, you are indicating your consent to this Privacy Policy and agree to be bound by its terms. This privacy statement does not cover our use of information collected through any other means.

## Information Collection, Use, and Sharing

We are the sole owners of the information collected on this site. We only have access to/collect information that you voluntarily give us via email or other direct contact from you. We will not sell or rent this information to anyone.

We will use your information to respond to you, regarding the reason you contacted us. We will not share your information with any third party other than as necessary to fulfill your request, e.g. to ship an order or whereby required by vendors to maintain authorized distribution status or demand generation requirements. Some vendors require point of sale information from authorized distributors and all such cases are covered by a non-disclosure agreement between DM and the vendor.

Unless you ask us not to, we may contact you via email in the future to tell you about specials, new products or services, or changes to this privacy policy.

Please be aware that DM may be required to disclose an individual's personal information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements. DM is liable for appropriate onward transfers of personal data to third parties.

## Security

We take precautions to protect your information. When you submit sensitive information via the website, your information is protected both online and offline.

Wherever we collect sensitive information (such as credit card data), that information is encrypted and transmitted securely.

While we use encryption to protect sensitive information transmitted online, we also protect your information offline. Only employees who need the information to perform a specific job (for example, billing or customer service) are granted access to personally identifiable information. The computers/servers in which we store personally identifiable information are kept in a secure environment.

DM has databases and systems that are maintained in accordance with industry standards to reasonably secure all of our customer's information. However, you should be aware that absolute security does not exist on the internet, and that no security measures are perfect or impenetrable.

#### Display of Credit Card Information

DM will never display more than the last four digits of your credit card number on the screen or on any invoices for your protection.

#### Access

DM will allow an individual access to their Personal Information and allow the individual to correct, amend or delete inaccurate information, except where the burden or expense of providing access would be disproportionate to the risks to the privacy of the individual in the case in question or where the rights of persons other than the individual would be violated.

#### Account Information

DM may release account information if we believe, in good faith, that such release is reasonably necessary to (1) comply with the law, (2) enforce or apply the provisions of our Terms and Conditions, or (3) protect the rights, property or safety of DM, our customers or other individuals.

#### Credit Card Verification

Please note that when you order products and services from DM, we will use a credit card verification company to validate the credit card and other information you provide before we can fill your order. We have an agreement with such companies to ensure that our customers' personal information is kept confidential.

#### Cookies

What are "cookies" and how are they used by DM?

"Cookies" are pieces of information that our website can send to your browser which can later be stored on your computer's hard drive so that we can recognize you when you return. All pages on a DM site that prompts you to log in or customize information require that you accept cookies. We may also use ads on our website that contain cookies. Our cookies do not contain any personally identifiable information, but they do enable us to provide a personalized website based on your particular needs. Most web browsers automatically accept cookies, but can be turned off in your browser settings, if preferred.

#### Your Consent

By using a DM website, you consent to the collection and use of this information by DM. This Privacy Policy is subject to change without written notice and the current policy will always be available via this web page. Potential changes to this policy may be dictated by vendors to maintain authorized distribution status. When such changes occur, this document will provide details of what information we collect, how we use it, and under what circumstances it is

disclosed. We will take commercially reasonable measures to obtain written or active e-mail consent from our members if DM is going to be using the personally identifiable information collected from the user in a manner different from that stated at the time of collection. We will also post the changes in our Privacy Policy on this page.

#### Our Companywide Commitment to Your Privacy

To make sure your personal information is secure, we communicate our privacy and security guidelines to our employees and strictly enforce privacy safeguards within the company.

#### Enforcement

DM uses a self-assessment approach to assure compliance with this privacy policy and periodically verifies that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented and accessible. We encourage interested persons to raise any concerns using the contact information provided below. If a complaint or dispute cannot be resolved through our internal process, we agree to dispute resolution using the American Arbitration Association as a third party resolution provider (<http://go.adr.org/privacysshield.html>).

Under certain conditions detailed in the Privacy Shield, individuals may be able to invoke binding arbitration before the Privacy Shield Panel to be created by the US Department of Commerce and the European Commission.

#### Contact Information

Attn: Director, Human Resources  
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St. Charles, MO 63304  
636.300.4000