Greenleaf Corporation Privacy Policy

This policy summarizes what personal information Greenleaf Corporation and its European subsidiary, Greenleaf Europe BV, (both hereinafter, "Greenleaf") may collect, how that information may be collected, the purposes for which the information is used, and with whom the information may be shared. It is Greenleaf policy to comply with all applicable laws and regulations concerning privacy and data protection. Greenleaf stores personal information in physical files at Greenleaf or on databases controlled by Greenleaf, and we employ reasonable safeguards to protect the security, confidentiality, and integrity of individuals' personal information.

Greenleaf does not sell its products to the retail consumer; rather, it sells its products to other businesses for use in the manufacture of their own products. Therefore, Greenleaf does not market its products to retail consumers and does not seek to collect personal information from retail consumers. However, Greenleaf may collect the personal information of certain individuals as part of its business operations, including the employees of companies with whom Greenleaf does business or may do business.

In offering and providing products to our customers, Greenleaf may collect personal information about some employees of those customers, as well as some employees of vendors providing products and services to Greenleaf. This personal information consists of identifiers, such as name, Internet Protocol address, email address, and other similar identifiers, as well as employment information such as employer, job title, job duties, etc. This information is collected through business-to-business interactions with our customers, through websites, as well as through other third-party sources, including publicly and commercially available sources. This information is collected solely to allow Greenleaf to respond to customer requests, to offer and deliver products to our current and prospective customers, and to provide customer support, unless otherwise required by law. We store this information on databases or in electronic or physical files at Greenleaf. This information may be shared with third parties such as distributors, shippers and credit card companies to expedite customer orders.

Through our website (https://greenleafcorporation.com), Greenleaf may use one or more third party analytics services to collect information on how users find and interact with our website. This information is used to improve our website, as well as to develop marketing content for our products. This information is stored electronically at the third party service providers. For more information on any third party analytics services currently being used on our website, please go to: support.google.com/analytics.

Greenleaf may also provide forms on its website for interested users to fill out. These forms may collect contact information, the identity of any company or organization that the user is representing, and other identifiers, as well as the user's interests, questions, comments and requests concerning Greenleaf and/or its products. This information is used to respond and provide support to these users and their companies, to offer and deliver products to them, to develop marketing content for our products, and to improve our products and customer support. We store this information on databases or in electronic or physical files at Greenleaf. This information may be shared with third parties such as distributors, shippers and credit card companies to better respond and provide support to these users and their companies and to expedite product orders.

Greenleaf does not sell the personal information it collects.

If you are a resident of California or a resident of the European Union, please see the privacy rights notices below to learn about certain rights you may have with respect to personal information that may be collected by Greenleaf.

Privacy Rights Notice for Residents of California

The terms and conditions contained in this Privacy Rights Notice apply solely to the personal information of California residents we may process. The California Consumer Privacy Act ("CCPA") provides California residents ("you") with specific rights regarding your personal information. This Privacy Notice describes those CCPA rights and explains how to exercise them.

You have the right to request certain information about Greenleaf's collection and use of your personal information over the past twelve (12) months. Once we receive and confirm your verifiable consumer request (as described further below), we will disclose to you (to the extent possible and permitted by law):

- The categories of personal information we collected about you;
- The categories of sources from which we collected your personal information;
- Our business or commercial purposes for collecting your personal information;
- The categories of third parties with whom we shared your personal information; and
- The specific pieces of personal information we collected about you (also called a data portability request).

The CCPA also provides rights with respect to the sale of personal information. However, Greenleaf does not sell personal information, so those rights are not applicable to Greenleaf.

You have the right to request that Greenleaf delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete your personal information from our records, and we will direct our service providers to delete your information from their records, unless an exception applies.

To exercise any of the access, data portability and deletion rights described above, please submit a verifiable consumer request to us either by emailing us at: privacy@greenleafcorporation.com; by calling us at: (800) 458-1850, and asking to be put through to the General Counsel or to the Legal Assistant; or by writing to us at:

General Counsel / Legal Assistant Greenleaf Corporation 18695 Greenleaf Drive Saegertown, Pennsylvania 16433

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The request must:

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

We cannot respond to your request or provide you with personal information if we are unable to verify your identity or authority to make the request and confirm the personal information relates to you. Regardless of how you submit your request, we will use personal information provided in a verifiable consumer request only to verify the requestor's identity or authority to make the request.

We will use reasonable efforts to initially respond to a verifiable consumer request within 10 days of its receipt, and to provide a substantive response within 45 days of receipt. If we require more time (not to exceed 90 days from receipt), we will inform you of the reason and extension period in writing. We will deliver our written

response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period before 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 provide your personal information in a format that is commercially reasonable and should allow you to transmit the information to another entity.

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.

We will not discriminate against you for exercising any of your CCPA rights.

We reserve the right to amend this Privacy Rights Notice at our discretion and at any time. When we make changes to this Privacy Rights Notice, we will post the updated Notice on our website. Your continued use of our website following the posting of changes constitutes your acceptance of such changes.

If you have any questions or comments about this Privacy Rights Notice, the ways in which we collect and use your personal information, or your choices and rights regarding such use, please contact us either by emailing us at: privacy@greenleafcorporation.com; by calling us at: (800) 458-1850, and asking to be put through to the General Counsel or to the Legal Assistant; or by writing to us at:

General Counsel / Legal Assistant Greenleaf Corporation 18695 Greenleaf Drive Saegertown, Pennsylvania 16433

Privacy Rights Notice for Residents of the European Union

The terms and conditions contained in this Privacy Rights Notice apply solely to the personal data of European Union residents we may process. The European Union's General Data Protection Regulation ("GDPR") provides European Union residents ("you") with specific rights regarding your personal data. To comply with the requirements of the GDPR, this Privacy Notice outlines the legal basis on which we process your personal data, provides additional information, and describes certain rights you have under the GDPR and how to exercise those rights.

Greenleaf will only process your personal data where we have a lawful basis to do so. The lawful basis for our processing of your personal data will depend on the purposes of the processing. The different lawful bases we rely on are:

- <u>Legitimate interests</u>: Where the processing is necessary for our legitimate business interests. This may include processing to inform you of changes to our products, or to provide you with information about other products we offer.
- <u>Consent</u>: Where you have provided us with consent to process your personal data for a specific purpose, such as when you request that we contact you with information about our products. Where consent is relied upon as the lawful basis for processing your personal data, you may withdraw that consent at any time.
- <u>Contractual necessity</u>: Where the processing is necessary for the performance of or entry into a contract
- <u>Legal claims</u>: Where the processing of your personal data is necessary for the establishment, exercise, or defense of legal claims.
- Legal obligation: Where we are required to process your personal data by law.

To determine the period for which your personal data will be retained, Greenleaf considers criteria such as: the purposes for which the data was collected; legal requirements to retain the data for a certain period of time; obligations to retain the data related to actual or potential litigation or government investigations; and contractual requirements to retain the data in relevant agreements.

Greenleaf may transfer personal data outside the European Economic Area (which comprises the countries in the European Union and Iceland, Liechtenstein and Norway) to the United States under appropriate safeguards by way of standard data protection clauses. This includes transferring contact information of customer employees to the United States in order to fulfill orders, answer certain requests or provide certain information about our products.

Greenleaf would like to make sure you are fully aware of all of your data protection rights. You are entitled to the following:

- The right to access: You have the right to request of Greenleaf copies of your personal data. We may charge you a small fee for this service.
- The right to rectification: You have the right to request that Greenleaf correct any data you believe is inaccurate. You also have the right to request Greenleaf to complete data you believe is incomplete.
- <u>The right to erasure</u>: You have the right to request that Greenleaf erase your personal data, under certain conditions.
- The right to restrict processing: You have the right to request that Greenleaf restrict the processing of your personal data, under certain conditions.
- The right to object to processing: You have the right to object to Greenleaf's processing of your personal data, under certain conditions.
- The right to data portability: You have the right to request that Greenleaf transfer the personal data that we have collected to another organization, or directly to you, under certain conditions.
- The right to lodge a complaint with a supervisory authority: Greenleaf will diligently seek to address and settle any requests or complaints brought to its attention. In addition, you have the right to approach the competent data protection authority with requests or complaints. This can be the supervisory authority in the country or federal state where you live.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us by email at: privacy@greenleafcorporation.com; or by phone in the U.S. at: (814) 763-2915, and ask to be put through to the General Counsel or to the Legal Assistant; or by writing to us at:

General Counsel / Legal Assistant Greenleaf Corporation 18695 Greenleaf Drive Saegertown, Pennsylvania 16433

Please note that this website and other Greenleaf websites are published in the United States. If you are located within the European Union, you should be aware that when you access these websites and provide your personal data, you are transferring your personal data to the United States where it is being collected and processed. We will take steps reasonably necessary to ensure that your personal data is subject to appropriate safeguards and that it is treated securely and in accordance with this privacy statement.