

McLane Company, Inc. **Website Privacy Notice**

Effective Date: May 6, 2020

1. What is this document and why should you read it?

This Privacy Notice applies to persons who visit our websites, including but not limited to representatives of our corporate customers, inventory suppliers, and vendors (collectively, "Business Partners") of McLane Company, Inc., its divisions, and its subsidiaries, including but not limited to the McLane Foodservice division, Vantix Logistics, Inc., and Consumer Value Products (collectively, "we," "us," or "McLane"). It sets out the basis upon which we collect, use, store, share and keep secure the personal information you provide to us in connection with setting up and maintaining an account for your business, and with maintaining our website. It also describes how we use the information you provide to us.

This Privacy Notice also sets out details on how to contact us if you have any questions, comments or requests.

This Privacy Notice does NOT apply to individuals who participate in loyalty and rewards program offered by our Business Partners and administered by McLane. To access the privacy notice applicable to you as a loyalty or rewards program participant, please see the [McLane Privacy Policy for Loyalty App Consumers](#), or you may access the privacy notice through the application itself.

2. What types of personal information do we collect and where do we get it from?

For representatives of our Business Partners, as part of setting up your company's account, we collect personal information like your name, corporate email address, physical address, phone number(s), and fax number; a tax ID number (which could be a Social Security Number); the name(s) and contact information of your chief executive officer(s) and other corporate contact personnel; images of your W-9 and various business licenses (e.g. to sell tobacco products); and banking information. We may verify this information with publicly available information.

If you do not provide information that is necessary for us to open your account, you may not be able to conduct business with us.

For representatives of our Business Partners, we will typically collect your personal information directly from you (for example, when you become a McLane Business Partner, call us or send us an email, or register for one of our tradeshow) or through your interaction with our website. We may also collect personal data about you from third-parties (that is, individuals and organizations that are not part of McLane). In addition we may obtain it from some public sources, such as publically available maps and lists (e.g. US-government lists of sanctioned entities).

The personal information about you that we collect includes information within the below categories of data. These categories also represent the categories of personal information 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.

We do not and will not sell personal information about you, as defined under California state law. We also have not done so for the last 12 months. In addition, we do not share the personal information with third parties for their direct marketing purposes.

Category	Source	Purpose of Collection	Disclosed for a business purpose?	Who Shared With?
<p>Personal Identifiers. 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.</p>	<p>A subset of this information is collected directly from you or from our service providers.</p>	<p>A subset of this data is necessary for us to open your account, call you or send you email, register you for our tradeshows, process delivery of products or services to/from you. We also use it to send you notifications about your account, including billing statements, and to process/collect payments. We also use this information to advertise McLane products/services that might be of interest to you.</p>	<p>Yes</p>	<p>Service providers</p>
<p>Information About 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.</p>	<p>A subset of this information is collected directly from you or from our service providers.</p>	<p>A subset of this data is necessary for us to open your account, call you or send you email, register you for our tradeshows, process delivery of products or services to/from you. We also use it to send notifications about your account, including billing statements, and to process/collect payments. We also use this information to advertise McLane products/services that might be of interest to you.</p> <p>We may also collect this information to verify your status as a business, to run a credit report, to ensure McLane is legally permitted to conduct financial transactions with you, and to verify your legal authority to do business and to sell certain regulated products (e.g. tobacco).</p>	<p>Yes</p>	<p>Service providers</p>

Category	Source of Information	Purpose of Collection	Disclosed for a business purpose?	Who Shared With?
<p>Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<p>A subset of this information is collected directly from you.</p>	<p>A subset of this data is processed in order to service your account; to understand your preferences; to enable McLane and our service providers to generate analytics regarding your purchases from McLane (and our purchases from you); and to send you notifications, including billing statements, promotions, special offers or information about new products and/or services.</p>	<p>Yes</p>	<p>Service providers</p>
<p>Usage Information. Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.</p>	<p>Cookies and/or web beacons may be used to automatically collect a subset of this information from you when you visit our Websites.</p>	<p>A subset of this data is used for marketing purposes, including offering you products/services that may be of interest to you.</p> <p>It is also processed in order to help manage and administer your account, as well as to detect security incidents; protect against malicious, deceptive, fraudulent or illegal activity; for compliance management; data analytics; and technological development of our systems.</p>	<p>Yes</p>	<p>Service providers</p>
<p>Recordings. Audio, electronic, visual, thermal, olfactory, or similar information.</p>	<p>This information is collected directly from you.</p>	<p>When you call into our call center, we may record the call in order to ensure the quality of our customer support operations.</p>	<p>No</p>	<p>None</p>
<p>Professional or Employment-Related Information, such as your employer and your job title.</p>	<p>This information is collected directly from you or through our service providers.</p>	<p>This data is necessary to open an account with us, call us or send us an email, or register for one of our tradeshows. We also use it to send notifications about your account, including billing statements.</p>	<p>Yes</p>	<p>Service providers</p>

3. Who do we share personal information about you with, and why?

The broad classes of third-parties to which we may transfer personal information about representatives of our Business Partners include: payment processors; accountants; lawyers; marketing firms engaged by McLane to notify our Business Partners of upcoming events or new products/services, and to provide analytics information to McLane; freight carriers or brokers involved in the delivery of our products to you or your products to us; travel agencies engaged by McLane to make travel arrangements for you; and contract compliance companies engaged to ensure payments received from you (or made to you by McLane) are consistent with the terms of our agreements with you. We also transfer some personal information about you to governmental authorities (including tax authorities) where required by, or in order to comply with, law.

We will endeavor to ensure that all non-governmental third parties to which we transfer personal information about you agree, as part of their contract with us, to treat personal information about you in accordance with applicable privacy laws.

From time to time, we may also be required to provide your personal information to other persons, such as in the event that we sell any business or assets (in which case we may disclose your personal information to the prospective buyer of such business or assets) or if we, or substantially all of our assets, are acquired by a third party (in which case personal information held by us about you will be one of the transferred assets) or if we are required to disclose your personal information in connection with any legal proceedings or requirements (such as to our lawyers, government agencies, courts or tribunals).

4. Cookies

When you visit our website(s), we use so-called “cookies” to operate our website(s), and to make our website(s) more user-friendly, effective, and secure. A cookie is a small piece of data sent from a website and stored in a file on your browser. A cookie is useful for having the browser remember specific information across several pages or between visits to a website. In addition to cookies, we use scripting, which is code run on the website to collect information such as actions you have completed on our website or items you click on. We also use “pixels,” which are transparent image files sent from the website to your browser to help us record items like IP address and time. For the purposes of this Policy, we refer to all these technologies as “cookies.”

Our website(s) does not read any information stored in a file on your browser, except in rare cases where the other website is a provider of information or functionality within our website and that cookie is necessary to make our website function correctly.

As stated above, we use cookies to operate our website. These are called “required cookies,” and they will be set regardless of your consent. Most of the other cookies we use are “session cookies” which expire within 24 hours of you entering the site. Other cookies, so-called “persistent cookies,” remain on your computer until you delete them. Using these cookies allow us to enhance your experience in interacting with our website, such as by helping recognize your browser the next time you visit and loading previously viewed pages faster. We use cookies to offer you the best possible experience on our website.

We also use cookies to collect browsing information in order to improve your overall experience. We use this information to track website usage and compile statistics. This helps us improve the website, so you will find it more useful and informative, and enable customized promotions that may be of interest to you. We may use the combination of data we collect, such as browsing information and email address, to join known devices together and provide you personalized experiences on the device you are currently using. Impression data from cookies, which indicates who has seen advertisements about our products and services on our website or third party websites, may be used to improve our marketing practices. If you are a current customer, have logged into your account, placed an order through our website or provided your email address, we may use analytics software to link data we collect, such as use of our website, opening emails we send you or contacting our customer service center via phone, back to you.

You can set your browser to notify you when you receive a cookie, giving you the chance to decide whether to accept it. Browsers may also be set up to display a warning when a cookie is used. You may even disable your browser from accepting cookies. Disabling cookies is unique to each browser and device you use. Disabling cookies on one device will restrict the ability to tie that device to other devices you use. Parts of our website may not function properly if you disable cookies. To provide you with the best possible experience while visiting our website, please enable cookies within your browser.

[Do Not Track](#)

We do not currently support the capability to respond to web browser “do not track” signals.

Google Analytics

We use a tool called “Google Analytics” to collect information about use of our website. This tool uses persistent cookies to allow us to see behavior information relating to visitor age, gender and interests. We may also use this data to create remarketing lists. Visitors can opt-out of Google Analytics for Display Advertising and customize Google Display Network ads using Google’s [Ad Settings](#).

You can opt out of Google Analytics without affecting how you visit our website. For more information on opting out of Google Analytics tracking, visit this [Google page](#).

5. Where do we keep personal information about you and how long do we keep it for?

We store personal information about you in physical files or on computer systems operated by or under the instruction of McLane and/or at our facilities. We will maintain personal information about you for as long as necessary in connection with both our and your legal rights and obligations, and in accordance with our Records Retention Schedule. We will delete personal information about you in accordance with our Records Retention Schedule.

6. How do we keep personal information about you secure?

We have reasonable measures in place to prevent personal information from being accidentally lost, used, or accessed in an unauthorized way. We limit access to personal information to those who have a business need for such access. Those individuals who process personal information on our behalf may do so only in an authorized manner. They are also subject to a duty of confidentiality. We have policies in place that regulate how employees within McLane must handle data, including personal information. We limit access to our premises and to our computer networks, and we take reasonable steps to safeguard against unauthorized access to such premises and networks. We have procedures in place to manage any suspected data security breach and will notify you and any applicable regulator of a data security breach consistent with legal requirements.

7. What are your rights in relation to personal information about you and how can you exercise them?

Depending on where you live, your current jurisdiction and applicable data protection laws, and subject to any relevant restrictions/exemption, you may be entitled to all or some of the rights described below regarding your personal information, subject to certain conditions and limitations. Only those rights relevant in your jurisdiction will apply. We may, however, choose to offer these rights, even if we are not required to under applicable law. If you are a representative of a commercial entity, you may be entitled to these rights effective January 1, 2021.

- *Right to Know* – You may be entitled to request that we disclose to you personal information we have collected about you, the categories of sources from which we collected the information, the purposes of collecting the information, the categories of third parties with whom we have shared the information, the categories of personal information that we have shared with third parties for a business purpose, the categories of information sold, and the categories of third parties information is sold to. In some instances, you may have the right to receive the information about you in a portable and readily usable format. Before providing any of this information, we must be able to verify your identity.
- *Right to Opt-Out* – You may have the right to opt-out of information sharing that constitutes a “sale” of personal information under California law.
- *Right to Deletion* – Subject to certain conditions, you may be entitled to request that we delete personal information about you. Before deleting information, we must be able to verify your identity. We will not delete personal information about you when the information is required to fulfill a legal obligation, is necessary to exercise or defend legal claims, or where we are required or permitted to retain the information by law. For example, we cannot delete information about you while continuing to provide you with certain products and services or where we are legally required to retain certain information.

If you chose to exercise any of these rights, to the extent that they apply, state law prohibits us from discriminating against you on the basis of choosing to exercise your privacy 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.

You can submit requests to exercise these rights by calling us at 1-800-517-5179 to speak to a member of our team.

Before providing information you request in accordance with these rights, we must be able to verify your identity. In order to verify your identity, you will need to submit information about yourself, including your name, residency information, contact information and, to the extent applicable, providing your account login credentials. We will match this information against information we have previously collected about you or provided to you to verify your identity and your request (for example, we may send a verification code to your email or cell phone number on file). If we are unable to verify your identity as part of your request, we will not be able to satisfy your request. We are not obligated to collect additional information in order to enable you to verify your identity. For deletion requests, you will be required to submit a verifiable request for deletion and then to confirm separately that you want personal information about you deleted.

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.

8. Where can you find out more?

If you have any questions, concerns, complaints or suggestions regarding our Notice, have any requests related to your personal data pursuant to applicable laws, or otherwise need to contact us, you may do so by calling 1-800-517-5179.

9. Children and minors

We do not knowingly collect personal information directly from individuals under 17 years of age. Our services are not intended for individuals under 17 years of age. No one under 17 years of age should submit or post personal information through our services. We may collect personal information regarding individuals under 17 years of age from their parents or legal guardians, but only as necessary to provide our products and services. We do not knowingly sell the personal information of minors under 17 years of age.

10. Changes to this Privacy Notice

We may change this Policy at any time, and in accordance with applicable law. We will post the revised policy to our website. The date this Notice was last revised will appear at the top of the page.