



Century Distribution Systems, Inc. and VMS (Visibility Management System)[®] Websites Privacy Policy

Century Distribution Systems, Inc. ("Century") is committed to safeguarding the privacy of our website visitors. This document is representative of the privacy policy that Century Distribution Systems, Inc. (Century) has regarding handling the personally identifiable information (PII or "Personal Information") that you provide to us when you visit one of our websites to either browse for information or log into our web-based system, VMS (Visibility Management System)[®], to conduct business. PII information is information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual. We do not require you to register or provide PII information to visit our websites.

Personal Identifiable Information

Normally Century does not collect PII about you when you visit our websites. The submission of information through our website is voluntary and provides us permission to use the information for a specific purpose. If you fail to provide us with certain information it may result in Century's not being able to perform or supply you with the results you may desire. Completing website forms and providing us with your PII information will allow us to use that information to complete your request efficiently. Depending on the form or request being presented, the amount of information we need to obtain may vary. We do not share the PII information that you provide us with any other third party not affiliated with Century, including but not limited to any other non-affiliated business entity, nor do we collect information for analytical purposes or commercial marketing, except as disclosed in this Privacy Policy.

If needed to contact you, we may collect and store information about you; i.e., name, email address, telephone number, etc. We will safeguard your information in accordance with the Privacy Act of 1974, as amended 5 U.S.C. § 552a. The Act requires all public-facing sites or forms that request PII to display a privacy notice.

Notice must address the following information:

- 1) Legal authorization to collect information about you;
- 2) Purpose for which the information will be used;
- 3) Routine uses for disclosure of information outside Century Distribution Systems, Inc.
- 4) Whether your providing information is voluntary or mandatory under law; and
- 5) Effects if you choose to not provide the requested information.

Website Email Communications

Our websites may allow you to communicate with us via email. We use this information to respond to your inquiry. Our response may require additional information to complete your request. The information that we provide may be limited depending on the nature of the inquiry. Email inquiries cannot be guaranteed against interception and Century will never ask for any sensitive information, including but not limited to social security numbers, bank account information, credit card information, passwords, etc. Therefore, we do not include sensitive information in any email form.

What We Collect and Store Automatically

Browsing through any website can cause certain information about your visit to be collected. Century can collect the following information automatically when you visit our websites:

- Domain from which you access the Internet;
- IP address (an IP address is a number that is automatically assigned to a computer);
- Operating system and information about the device or browser used when visiting the site;
- Date and time of your visit;
- Content you visited or downloaded; and
- Website or referral source that connected you to the website.

Cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

There are two types of cookies, session cookies and persistent cookies. Session cookies will be deleted from your computer when you close your browser. Persistent cookies will remain stored on your computer until deleted, or until they reach a specified expiry date.

We may use session cookies to keep track of you while you navigate through the website to prevent fraud and increase website security and for technical purposes to enable us to better navigate you through our site.

Using Your Personal Information

Personal information submitted to us via our websites will be used for the purposes specified in this privacy policy or in relevant parts of the website. We may use your personal information to:

- 1) administer the website;
- 2) improve your browsing experience by personalizing the website;
- 3) enable your use of the services available on the website;
- 4) send you general (non-marketing) commercial communications;
- 5) send you email notifications which you have specifically requested;
- 6) send you our newsletter or other relative communications relating to our business which we think may be of interest to you, by post or, where you have specifically agreed to this, by email or similar technology. You can opt out of receiving any type of communication from us at any time;
- 7) deal with inquiries and complaints made by or about you relating to the websites;
- 8) keep the website secure and prevent fraud;
- 9) verify compliance with the terms and conditions governing the use of the website, including monitoring private messages sent through our website's private messaging service.

Your privacy settings can be used to limit the publication of your information on the websites. You can adjust your privacy settings under your Internet browser "Privacy Setting" tools.

We will not provide your personal information to any third parties for direct marketing purposes.

Disclosures

We may disclose your personal information to any of our employees, officers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this privacy policy. We may disclose your personal information to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes set out in this Privacy Policy.

In addition, we may disclose your personal information:

- 1) to the extent that we are required to do so by law;
- 2) in connection with any ongoing or prospective legal proceedings;
- 3) in order to establish, exercise or defend our legal rights (including providing information to others for the security prevention); and
- 4) to the purchaser (or prospective purchaser) of any of Century's businesses or assets that we are (or are contemplating) selling.

Except as disclosed in this Privacy Policy, we will not provide your information to third parties.

Third Party Websites

Century does use social media websites for the purposes of engaging and informing the public. We use these services to disseminate information about our company and the services that we provide. We do not use third-party websites to solicit or collect PII from individuals. No PII information will be disclosed, sold or transferred to any other entity outside Century unless required under the law or as disclosed under this Privacy Policy.

International Data Transfers

Information that we collect may be stored and processed in and transferred between any of the countries in which we operate to enable us to use the information in accordance with this Privacy Policy. Information which you provide may be transferred to countries in which we operate that may not have the same data protection laws as those in force in the United States.

Security of Your Personal Information

We will take reasonable technical and organizational precautions to prevent the loss, misuse or alteration of your personal information. We will store all the personal information you provide on our secure (password and firewall protected) servers. You acknowledge that the transmission of information over the Internet is inherently insecure, and we cannot guarantee the security of data sent over the Internet. Users are responsible for keeping their password and other login details confidential. We will not ask for your password except when you log into the VMS® website.

Site Security

Century is committed to protecting your PII information. We take measures to ensure the safety, security, confidentiality, and integrity of the information we collect from our sites. We maintain access controls which limit access to proprietary information. We also have various security technologies that run to managed and protect information on our servers.

- Century has commercial network programs that monitor and identify unauthorized attempts to upload or change information;
- Century will not attempt to identify individuals unless required by law;
- Unauthorized information or uploads is strictly prohibited and can be punishable under the Computer Fraud and Abuse Act of 1986 and the National Information Infrastructure Protection Act.

Interaction with Children Online

Century is committed to the protection of children's online privacy. The Children's Online Privacy Protection Act (COPPA) governs the information gathered online from or about children under the age of 13. Consent from a child's parent or guardian is required before collecting, using, or disclosing personal information under the age of 13. Century will adhere to the COPPA and not collect information from a child under the age of 13.

Visiting Other Websites

Our website contains links to other affiliates and private organizations. We do not control the contents of third party websites and they may not follow the same privacy and security policies as Century. By agreeing to access or accessing a third-party website, you are accepting the policies under that site.

Privacy Contact Information

If you have any questions, concerns or comments about this Privacy Policy you may contact us at:

Email: lsfotia@cds-net.com

Via Mail: Century Distribution Systems, Inc.
Attn: Compliance
4860 Cox Road, Suite 210
Glen Allen, VA 23060

Century reserves all rights to make changes to this policy.

This policy was last modified on 12/12/2017.