



Privacy Notice

Last Updated: **October 15, 2024**

ASRC Industrial Services, LLC, and its subsidiaries and affiliated companies (“**Company**”, “**AIS**”, “**we**”, “**us**”, or “**our**”) takes your privacy seriously. We want you to know how we collect, use, disclose, and retain your personal information.

This Privacy Policy explains:

1. What categories of personal information we collect
2. The categories of sources from which we collect this personal information
3. The purposes for which we use your personal information
4. How we may disclose your personal information
5. How we protect the personal information we collect
6. How long we keep your personal information
7. Additional information for California residents
8. Changes to this Privacy Policy

Notice at Collection for California Residents:

AIS collects the personal information identified in Section 1 for the purposes identified in Section 3 and retains it for the period described in Section 6. We do not sell your personal information or disclose it for cross-context behavioral advertising (“**sharing**”). We also do not collect or process sensitive personal information for the purpose of inferring characteristics about you. To the extent you provide AIS with personal information about other California residents, you are responsible for providing this notice to them.

CHILDREN’S ONLINE PRIVACY PROTECTION ACT COMPLIANCE

We do not collect information from anyone under 13 years of age. The products and/or services we provide, together with our Site, are all directed to individuals who are at least 13 years old. If you are under the age of 13, you are not authorized to use our services or the Site.

Scope

This Privacy Policy applies to the personal information of individuals (“**you**”, “**your**”, or “**yours**”) collected by AIS, including the personal information collected when you visit our website <https://asrcindustrial.com/> as it may be modified, relocated and/or redirected from time to time (the “**Site**”). This Privacy Policy does not apply to the personal information of individuals in their capacity as prospective, current, or former employees, contract workers, board members, or owners of ASRC Industrial Services, or their emergency contacts, dependents, or beneficiaries.

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

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Other web sites

The Site may contain links to other web sites not operated or controlled by use (“**Third Party Sites**”). The policies and procedures we describe here do not apply to Third Party Sites. The links from the Site do not imply that we endorse or have reviewed the Third Party Sites. We suggest contacting those sites directly for information on their privacy policies.

1) WHAT CATEGORIES OF PERSONAL INFORMATION WE COLLECT

- **Identifiers**, for example: real name, alias, telephone number, postal address, e-mail address, signature, and photographs.
- **Commercial Information**, for example: records of products or services purchased, and purchasing or consuming histories.
- **Other Personal Information:**
 - Financial Information**, for example: payment card details, billing address, and shipping address.
 - Communications Data**, for example: during our communications with you, we collect the content of these communications as well as metadata about the communications, *i.e.*, date and time of the call or text (SMS or MMS) message and phone numbers.
- **Internet or Other Electronic Network Activity Information**, for example: information about your usage of the Site, such as the pages you viewed, the services and features you used or interacted with; your browser type and details about any links or communications with which you interacted; internet protocol (IP); browser plug-in types and versions; and operating systems and platform.
- **Geolocation data**, for example: the Site collects IP addresses, which can indicate regional location.
- **Sensory or Surveillance Data**, for example: footage from surveillance cameras or voicemails and recordings as described above in “User Content”.
- **Professional Information**, for example: business contact information and title.
- **Inferences**, for example: AIS might infer based on your purchase history that you would be interested in other products or services.

Do We Use Cookies?

Yes. Cookies are small files that the Site or our service provider transfers to your computer’s hard drive through your Web browser that enables the Site’s or service provider’s systems to recognize your browser and capture and remember certain information. We use cookies to help us understand how users use the Site. For example, cookies gather information about how long you spend on a web page so that we can understand what web pages are of most interest to users.

If you prefer, you can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off cookies by adjusting your browser settings. If you turn off your cookies, some of the features on the Site may not function properly.

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2) THE CATEGORIES OF SOURCES FROM WHICH WE COLLECT YOUR PERSONAL INFORMATION

- **You**, for example, when you register with our Site, subscribe to online services, when you shop with us, or when you otherwise provide information directly to us.
- **Service providers**, for example, analytics providers, IT, and system administration services.
- **Affiliated companies**, for example, so that we can assist other companies in the AIS family of companies in providing you with products or services.
- **Automated technologies**, for example, browsing activity collected by automated technologies on the Site.
- **Third parties**, for example, lawyers, bankers, auditors, and insurers who provide consultancy, banking, legal, insurance, and accounting services.
- **Public sources**, for example, public databases.
- **Marketing/advertising companies**, for example, from social media platforms, consumer research companies, and analytics or marketing/advertising companies.
- **Surveillance/recording technologies installed by AIS**, for example, video surveillance in common areas of AIS facilities, voicemail technologies, and audio recording technologies with consent to the extent required by law.
- **Government or administrative agencies**, for example, law enforcement, public health officials, and other government authorities.
- **Acquired entity**, if AIS acquired another entity, AIS might collect personal information from that entity.

3) THE PURPOSES FOR WHICH WE USE YOUR PERSONAL INFORMATION

We use the categories of personal information we collect for one or more of the purposes below:

Providing Products and Services, including:

- To deliver our products and administer our services.
- To communicate with you.
- To improve our products and services, develop new products and services, and conduct research on further improvements.
- To enhance your experience using our products and services and to personalize your online experience.

Support and Marketing, including:

- For customer support.
- To respond to any requests, queries, suggestions, feedback, or comments you may have.

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- To send you marketing information about our products and services, including notifying you of marketing events, membership and rewards programs, promotions, and sweepstakes, with your consent in accordance with applicable law.
- To inform you of any changes to the services, your account (if applicable), this Privacy Policy, or any other policies or terms in relation thereto.
- To perform operations to maintain the services, including to conduct data analysis, testing, and research; and to monitor and analyze usage and activity trends.

Monitoring, Security, and Compliance, including:

- To administer and protect our business and our Site (including troubleshooting, analysis, testing, system maintenance, support, reporting and hosting of data, and preventing fraud and abuse).
- To store, host, or backup (whether for disaster recovery or otherwise) our services or any data contained therein.
- To protect the rights, property, or safety of AIS, you, or others.
- In connection with a corporate transaction, sale, or assignment of assets, merger, divestiture, or other changes of control or financial status of AIS or any of its subsidiaries or affiliates.
- To report suspected criminal conduct to law enforcement and cooperate in investigations.
- To exercise AIS's rights under applicable law and to support any claim, defense, or declaration in a case or before a jurisdictional and/or administrative authority, arbitration, or mediation panel.
- To ensure compliance with applicable laws and regulatory obligations.

Incidental Purposes: Any incidental purposes related to, or in connection with, the above.

4) HOW WE MAY DISCLOSE YOUR PERSONAL INFORMATION

AIS discloses personal information as necessary for the purposes described in Section 3 above to the following categories of external recipients:

- **Service providers and contractors:** AIS discloses your personal information to service providers and contractors for the purposes above to assist us in meeting our business needs and contractual and legal obligations.
- **Affiliated companies:** Other companies within the AIS family, for example, to provide you with our products and services.
- **Third parties:** For example, we might disclose personal information to lawyers to assist us with legal compliance or to business partners to assist us in providing services to you.
- **Government or administrative agencies:** For example, AIS may report unlawful activity to law enforcement.
- **Public:** AIS may disclose personal information to the public as part of a press release, for example, to announce the winner of a sweepstakes if required by state law.

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- **Required Disclosures:** We may be required to disclose personal information in a court proceeding, in response to a court order, subpoena, civil discovery request, other legal process, or as otherwise required by law.
- **Legal Compliance and Protections:** We may disclose personal information when we believe disclosure is necessary to comply with the law or to protect the rights, property, or safety of AIS, our users, or others.
- **Corporate Transactions:** We reserve the right to disclose and transfer your personal information, including your personal information:
 - To a subsequent owner or co-owner.
 - In connection with a corporate merger, consolidation, bankruptcy, the sale of substantially all of our membership interests and/or assets or other corporate change, including to any prospective purchasers.

5) HOW WE PROTECT THE PERSONAL INFORMATION WE COLLECT

The security and confidentiality of your personal information is important to us. We have technical, administrative, and physical security measures in place to protect your personal information from unauthorized access or disclosure and improper use.

For example, we use Transport Security Layer (TSL) encryption to protect the data collection forms on our Site. In addition, we restrict access to your personal information. Only employees who need the personal information to perform a specific job (for example, a customer service representative) are granted access to personal information. Employees with access to personal information are kept up-to-date on our security and privacy practices.

It is important for you to protect against unauthorized access to your password and to your computer. Be sure to close your browser after you have completed your visit to the Site.

Please note that despite our reasonable efforts, no security measure is ever perfect or impenetrable, so we cannot guarantee the security of your personal information.

6) HOW LONG WE KEEP YOUR PERSONAL INFORMATION

We retain your personal information for the duration of the customer relationship, if any. We also retain your personal information for 12 months after our last interaction with you. We will retain personal information longer as necessary to comply with legal, administrative, or procedural requirements, for example, a litigation hold.

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7) ADDITIONAL INFORMATION FOR CALIFORNIA RESIDENTS

A. Information About Disclosures of Personal Information

1. Disclosures for Business Purposes

AIS has disclosed each of the categories of personal information listed in Section 1, above, for the following “business purposes”, as that term is defined under the California Consumer Privacy Act (“CCPA”), in the last 12 months:

- **Service providers:** For the business purpose of performing services on AIS’s behalf and, in particular, for the specific purposes described in Section 3, above.
- **Auditors, lawyers, consultants, and accountants engaged by AIS:** For the business purpose of auditing compliance with policies and applicable laws, in addition to performing services on AIS’s behalf.
- **Affiliated companies:** To other companies within the AIS family of companies for the business purposes of (1) auditing compliance with policies and applicable laws, (2) helping to ensure security and integrity, (3) debugging, (4) short-term transient use, (5) performing services on behalf of AIS, (6) internal research, and (7) activities to maintain or improve the quality or safety of a service or device.

2. Sales and Sharing

We do not sell or share your personal information, where “share” means disclosing personal information to third parties for cross-context behavioral advertising. Without limiting the foregoing, we have not, and have no actual knowledge that we have, sold or “shared” the personal information of individuals of any age, including the personal information of children under 16, in the last 12 months.

We recognize that common understanding of the terms “sale” and “sharing” may differ from their technical legal definitions. If you would like to opt out of the use of cookies on our Site, please consider adjusting your browser settings to reject cookies. Information about how to adjust your cookies settings on different browsers is available here:

<https://allaboutcookies.org/how-to-manage-cookies>.

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3. Aggregated and Deidentified Information

We may aggregate and/or deidentify information, use it internally, and disclose to third parties. Neither Aggregated Information nor Deidentified Information (defined below) is personal information.

- **“Aggregated Information”** refers to information about a group of individuals from which the individually identifiable information has been removed. An example of Aggregated Information would be the statistic that 20 people used our website’s contact form on a given day.
- **“Deidentified Information”** means information subjected to reasonable measures to ensure that the deidentified information cannot be associated with the individual. An example of Deidentified Information would be the data point that an unidentified visitor first entered the Site through our main web page. We maintain Deidentified Information in a deidentified form and do not attempt to reidentify it, except that we may attempt to reidentify the information just to determine whether our deidentification processes function correctly. **[LITTLER NOTE: The CCPA requires that a business take the measures described in this paragraph to deidentify personal information. In addition, the business must “publicly commit” to refrain from re-identifying the data, which is why we have included this section. The CCPA also requires the business to contractually obligate any recipients of the deidentified information to comply with the points above. Otherwise, the information is not “deidentified” as defined by the CCPA. PLEASE DELETE THIS NOTE PRIOR TO FINALIZING THE POLICY.]**

B. Your California Privacy Rights

Subject to applicable law, California residents have the following rights:

- **Right to Know:** You have the right to submit a verifiable request for specific pieces of your personal information and for information about AIS’s collection, use, and disclosure of your personal information. Please note that the CCPA’s right to obtain “specific pieces” does not grant a right to the whole of any document that contains personal information, but only to discrete items of personal information. Moreover, California residents generally just have a right to know categories, for example, categories of third parties to which personal information is disclosed, but not the individual third parties.
- **Right to Delete:** You have the right to submit a verifiable request for the deletion of personal information that you have provided to AIS.
- **Right to Correct:** You have the right to submit a verifiable request for the correction of inaccurate personal information maintained by AIS, taking into account the nature of the personal information and the purposes of processing the personal information.

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Note on Sensitive Personal Information: AIS does not infer characteristics from sensitive personal information. AIS only uses sensitive personal information as necessary to perform the services or provide the goods the average person would reasonably expect when requesting those goods or services, to ensure security and integrity, short term transient use, to maintain the quality of our products and services, or for other purposes permitted by the California Consumer Privacy Act and implementing regulations without the right to opt out.

C. How to Exercise Your Rights

To the extent the CCPA is applicable, the AIS will respond to requests to know, delete, and correct in accordance with applicable law if it can verify the identity of the individual submitting the request. You can exercise these rights in the following ways:

- Call toll free at 1-833-930-CCPA (2272).
- legalnotices@asrcindustrial.com

D. How We Will Verify Your Request

We match personal information that you provide us against personal information we maintain in our files. The more risk entailed by the request (*e.g.*, a request for specific pieces of personal information), the more items of personal information we may request to verify your identity. If we cannot verify your identity to a sufficient level of certainty to respond securely to your request, we will let you know promptly and explain why we cannot verify your identity.

E. Authorized Agents

You may designate an authorized agent to exercise your right to know, to correct, or to delete. If an authorized agent submits a request on your behalf, the authorized agent must submit with the request another document signed by you that authorizes the authorized agent to submit the request on your behalf. In addition, we may ask you or your authorized agent to follow the applicable process described above for verifying your identity.

In the alternative, you can provide a power of attorney compliant with the California Probate Code.

F. AIS's Non-Discrimination Policy

AIS will not unlawfully discriminate against you for exercising your privacy rights under the CCPA.

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8) 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.

For More Information

For questions or concerns about AIS's privacy policies and practices, please contact us at legalnotices@asrcindustrial.com.

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