

## GLOBAL PRIVACY POLICY

Arpin Group, Inc. has one global privacy policy for customers that applies to the entire Arpin Group family of companies ("Arpin"). One privacy policy makes it clear and convenient for people to make informed choices about managing their personal information. This privacy policy applies to the entire Arpin Group family of companies including, but not limited to, Arpin Van Lines, Arpin International Group, Arpin Renewable Energy, and Creative Storage Solutions. Arpin is dedicated to complying with all applicable state, federal, and international privacy laws.

Arpin International Group, Inc. complies with the EU-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 to the United States. Arpin International Group, Inc. 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/>.

### 1. Acknowledgment and acceptance of terms

Arpin is committed to protecting your privacy. This Privacy Statement sets forth our current privacy practices with regard to the information we collect. By contracting or purchasing our services or products, you acknowledge and fully understand Arpin's Privacy Statement and freely consent to the information collection and use practices described in this Privacy Statement.

### 2. Participating Merchant Policies

Related services and offerings with links from Arpin's websites, including vendor sites, have their own privacy statements that can be viewed by clicking on the corresponding links within each respective website. Online merchants and others who participate in Arpin services are encouraged to participate in industry privacy initiatives and to take a responsible attitude towards customer privacy. However, since we do not have direct control over the policies or practices of participating merchants and other third parties, we are not responsible for the privacy practices or contents of those sites. We recommend and encourage that you always review the privacy policies of merchants and other third parties before you provide any personal information or complete any transaction with such parties.

### 3. Notice of Information: What We Collect and How We Use It

Arpin collects certain information from and about its customers/website users in three ways: directly from our web server logs, directly from customers, and with cookies.

a. Web Server Logs - When you visit our website, we may track information to administer the site and analyze its usage. Examples of information we may track include:

- Your Internet protocol address
- The kind of browser or computer you use.
- Number of links you click within the site.
- State or country from which you accessed the site.
- Date and time of your visit.
- Name of your Internet service provider.
- Web page you linked to our site from.
- Pages you viewed on the site

We do not knowingly collect personal information from children and will destroy such information if it is disclosed to us without proper parental consent.

- b. Use of Cookies - Arpin may use cookies to personalize or enhance your user experience by recalling your specific information on subsequent website visits. You have the ability to accept or decline cookies.
- c. Customers – By contracting or purchasing our services or products, you will need to provide some personal information such as name, address, email, telephone number or facsimile number, account number, and other relevant information. If you purchase a service or product, we will request financial information. Any financial information we collect is used only to bill you for the services you purchased. If you purchase by credit card, this information may be forwarded to your credit card provider. You may also be asked to disclose personal information to us so that we can provide assistance and information to you in connection with such service.

We will not disclose personally identifiable information we collect from you to third parties without your permission except to the extent necessary including, but not limited to:

- To fulfill your requests for services or products;
- To protect ourselves from liability;
- To respond to legal process or comply with law;

- To governmental entities, insurers, or other companies assisting in fraud prevention or investigations;
- In connection with a merger, acquisition, or liquidation of the company;
- To protect against fraud;
- To those you have authorized us to disclose the information and others as permitted or required by law;
- To other companies with which we jointly market or provide services or products. Arpin only retains personal information as long as is required to perform contracted services or as required by law.

#### **4. Use of Web Beacons or GIF files**

Arpin web pages may contain electronic images known as web beacons – sometimes also called single-pixel GIFS – that allow Arpin to count users who have visited those pages and to deliver co-branded services. Arpin may include web beacons in promotional email messages or newsletters in order to determine whether messages have been opened and acted upon. Arpin prohibits web beacons from being used to collect or access your personal information.

#### **5. Maintaining Accurate Records and Accessing Account Information**

We use reasonable efforts to verify the accuracy and timeliness of personal information used during the course of business. We periodically update this information based upon feedback and inputs provided by our customers. In accordance with our obligations under the EU-US Privacy Shield, we will provide you with a reasonable opportunity to access your personally identifiable information we have collected, correct it if inaccurate, or delete it as appropriate. Requests can be sent to [privacy@arpin.com](mailto:privacy@arpin.com).

#### **6. Complaints and Remedies**

In accordance with the EU/US Privacy Shield Principles:

- You may bring a written complaint directly to Arpin and we must respond to you within 45 days thereafter
- You are entitled, at no cost to you, to have any concerns or complaints that have not been resolved to your satisfaction by Arpin to be reviewed by an independent professional third party administrator: the American Arbitration Association/International Centre for Dispute Resolution <http://go.adr.org/privacyshield.html>.
- If you are located in the EEA and we have not been able to satisfactorily resolve your question or complaint regarding our privacy practices, you may raise your concern to the attention of your data protection authorities ("DPAs"). The DPAs will establish a panel to investigate and resolve complaints brought under the Privacy Shield and Arpin will cooperate with this panel. Furthermore, Arpin will comply with the advice given by data protection authorities and take necessary steps to remediate any non-compliance with the Privacy Shield Principles.
- You may also be entitled to invoke binding arbitration.
- Arpin will meet its liabilities, arising under the Privacy Shield, in relation to any transfers of your personal information to its suppliers, sub-contractors, and in cases of onward transfers to third parties.
- Your personal information is protected under the Privacy Shield as set out in more detail on the Department of Commerce's Privacy Shield website <https://www.privacyshield.gov>.
- Arpin is subject to the investigatory and enforcement powers of the Federal Trade Commission.

#### **7. Use, Choice, and Acceptance**

Your decision to provide us with your personal information is voluntary. Before Arpin provides you with services, you may elect to prohibit us from using your personal information and thereby prohibit us from using or sharing any such personal information with our approved suppliers and subcontractors who assist us in providing Arpin services. If you do choose to opt-out, we may be unable to provide you with the Arpin services that you require.

#### **8. Changes to this Statement**

We reserve the right to make changes to this Privacy Statement. This policy will be reviewed at least once per year and updated, if necessary. After review, it will be re-distributed to all necessary parties.

#### **9. Contacting Us**

You may request access to your information at any time by contacting an Arpin customer relations representative via email at [arpininfo@arpinintl.com](mailto:arpininfo@arpinintl.com) or by calling (U.S.) +1.800.343.3500 (Intl) +1.401.885.4600. Our representative will review and verify your personal information prior to disclosure.

If you have questions regarding our Privacy Statement, its implementation, failure to adhere to this Privacy Statement and/or our general practices, please contact us at [privacy@arpin.com](mailto:privacy@arpin.com).