

PRIVACY POLICIES

Casella Privacy Policy

Effective Date: March 24th, 2017

This Privacy Policy describes how Casella and our [Family of Companies](#) within IDEAL INDUSTRIES, INC. (“**Casella**,” “**we**” or “**us**”) collect, process, store, transfer and delete personal information. Please read this Privacy Policy carefully. When you visit our website(s), use our App(s), or otherwise provide us with your personal information online, you consent to the treatment of your personal information as we describe herein. This Privacy Policy is incorporated into and made a part of our [Terms of Use](#).

1. SCOPE

This Privacy Policy applies to the websites, mobile applications and online services (“**Services**”) that link to this Privacy Policy. This Privacy Policy does not apply to information collected offline or by any third-party websites or services that are not owned or operated by Casella or that do not link to this Privacy Policy.

2. CHANGES TO THIS PRIVACY POLICY

The Effective Date of this Privacy Policy is set forth at the top of this webpage. If we make a material change to the way we treat your Personal Information, as defined below, we will notify you in advance through the Services. Your continued use of the Services after the Effective Date constitutes your acceptance of the amended Privacy Policy. Any amended Privacy Policy supersedes all previous versions.

3. INFORMATION WE COLLECT

When you use the Services, we may collect two types of information: Personal Information and Usage Data (collectively, “**Information**”).

- “**Personal Information**” means any information that identifies or could be used to identify an individual. For example, Personal Information generally includes contact data (name, address, phone number or email address), demographic data (gender, date of birth or zip/postal code) and, in some jurisdictions, certain Usage Data (as defined below). Personal Information is typically information that you voluntarily provide to us.

- “**Usage Data**” means information about an individual’s activity when he or she uses the Services. Usage Data may, for example, include browser and device information, aggregated information (statistics and impressions) and information gathered by cookies.

We may link some Usage Data together. If the linked information can be used to reasonably identify an individual, we will treat such linked information as Personal Information.

4. HOW WE COLLECT AND USE YOUR INFORMATION

We collect and use Information for all lawful purposes in the operation and conduct of our business, such as:

- **When you interact with our Services:** We collect the Personal Information that you voluntarily provide when you use the Services, such as when you register with one of our Services or participate in our contests or surveys. If you choose to provide us with Personal Information, we may use your Personal Information to enable your participation in our Services, send you promotions, advertising or information that we think may interest you should you consent to it, and notify you about important information regarding changes to our terms, conditions and policies. In addition, we may use Usage Data to provide the Services and help us better deliver and improve the Services, such as by diagnosing problems, delivering advertising, and conducting market research about the traffic and patterns of use of our Services.

- **When you contact us:** When you contact us, we may use the Personal Information you provide, such as your name, address, email address, telephone number and inquiry or opinion, to respond to your questions, resolve your problems, and help us improve our customer service.

- **When you purchase products or enroll in a subscription service:** Certain of our Services may offer e-commerce platforms where you can purchase products or subscription services. We may collect your Personal Information and maintain your order/purchase history to fulfil orders, ensure proper delivery, or provide other services related to your purchases. We use a third party payment processor to collect and process your credit card information. We do not collect, access, store or process any credit card information related to your online transactions.

- **Through our Mobile Applications:** In order to use our mobile applications (“**Apps**”), you may need to register and create an account with us. We may collect Information about your use of our Apps, including Information about the location of the device used to access the Services (“**Location Data**”). Location Data includes: (i) the location of the device derived from GPS or WiFi use; (ii) the IP address of the device or internet service used to access the Services, and (iii) other information made available by a user or others that indicates the current or prior location of the user. If you do not want us to collect Location Data from your device, please delete the App or disable the location setting on your device. Please note that disabling the location setting may affect certain features of the App.

- **Through Social Media:** Certain Services may link with social media platforms and plug-ins (e.g., the Facebook "Like" button, google+, twitter or LinkedIn interaction options, comments, and posts on our YouTube videos) (collectively, “**Social Media**”). When you interact with the Services through a Social Media account, we may automatically receive Information from the Social Media platform. We may collect and use this Information for the purposes described in this Privacy Policy.

- **When you apply for employment:** If you apply for employment, you will be navigated to a third party website to create a profile and complete your application. The Personal Information we collect through your employment application and profile is solely used to

evaluate your application and consider you for current and future employment opportunities.

- **From other sources:** We may also receive Information about you through third parties with whom we contract, such as business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, and credit reference agencies.

5. COOKIES AND OTHER DATA COLLECTION TECHNOLOGY

Cookies are small text files that are sent to or accessed from your web browser or your computer's hard drive. A cookie typically contains the name of the domain (internet location) from which the cookie originated, the "lifetime" of the cookie (i.e., when it expires) and a randomly generated unique number or similar identifier. A cookie also may contain information about your computer, such as user settings, browsing history and Internet activities. We use the following types of cookies on our Services: •

- **Session Cookies** are used to operate our Services. Some cookies are essential for the operation of the Services. If a user chooses to disable cookies, certain content and features may not be available.

- **Preference Cookies** are used to remember your preferences. For example, when you select your location on one of our Services, we use cookies to remember your location preferences so you do not have to select it every time you visit the Service.

- **Advertising Cookies** are used to serve you with advertisements that we believe are relevant to you and your interests. These cookies also help us evaluate our marketing program performance and analytics.

- **Security Cookies** are used for general security purposes, such as user authentication and preventing fraudulent use or unauthorized access of data.

A **web beacon** (also called a pixel tag or clear GIF) is a piece of computer code that enables us to monitor user activity and website traffic. To learn more about cookies and web beacons, visit www.allaboutcookies.org. We refer to cookies, web beacons, and other similar technology as "**Data Collection Technology.**" Data Collection Technology enables us to remember your password for future log-ins, compile statistics about use of the Services, and detect and prevent fraud. Data Collection Technology also helps us and our ad management partners manage our online marketing program and deliver ads that are relevant or may be of interest to you.

Why Casella uses Data Collection Technology: We use Data Collection Technology to collect certain Usage Data to help us personalize and improve the performance of our Services. For example, we use Google Analytics to collect information to improve the Services, such as how often users visit a website, what pages they visit when they do so, and what other website they used prior to visiting the Services. Google Analytics places a cookie on your web browser so that it can identify you the next time you visit the website, the cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to the Services is restricted by the [Google Analytics Terms of Use](#) and the Google Privacy Policy.

We also use Adobe Marketing Cloud solutions to collect and analyse information, such as clicks made by visitors on our websites, apps and social networking pages to enable us better understand our online resources and marketing campaigns. For more information about Adobe Marketing Cloud, please review the [Adobe Marketing Cloud Privacy Policy](#).

Controlling cookies on your computer: If you visit a Service that uses cookies, we will notify you of such use. By continuing to use the Service after such notice, you accept the use of cookies. You may, at any time, choose to express or change your preferences with regard to accepting cookies.

If you do not wish to receive cookies, you may set your browser to reject cookies or alert you when a cookie is dropped on your computer. Usually, these settings are available through the security features of your web browser, and you should be able to consult the Help feature available for your browser for further information. Please be aware that if you disable cookies, some features on the Casella websites may not be available, such as those features which require identification. If need be, Casella will reject any responsibility for the consequences associated with degraded operation of its Services resulting from rejection of deletion of cookies and Casella's subsequent inability to register or consult the cookies necessary for operation.

Our policy on "Do Not Track" signals: California's Online Privacy Protection Act requires website operators to disclose how they respond to web browser's "Do Not Track" ("DNT") signals. Some web browsers incorporate a DNT or similar feature that signals to websites that a user does not want to have his or her online activity tracked. If a website that responds to a particular DNT signal receives the DNT signal, the browser can block that website from collecting certain information about the browser's user. Not all browsers offer a DNT option and DNT signals are not yet uniform. For this reason, many website operators, including Casella, do not respond to DNT signals.

Opting out of Interest-Based Advertising. Interest-based advertising is a way that helps companies provide you with more relevant advertising on the websites you visit of the applications you use. If you want to "opt out" of receiving online interest-based advertisements, please follow the instructions at www.aboutads.info/choices, or <http://www.networkadvertising.org/choices/>. An "opt-out" cookie will be placed on your device indicating that you do not want to receive interest-based advertisements. Please note that when you "opt-out" of receiving interest-based advertisements, this does not mean you will no longer see advertisements from us or on the Services. It means that the online ads that you do see will not be based on your particular interests. If you delete cookies on your device, generally you will need to opt-out again. More information about online behavioural advertising can be found at www.aboutads.info.

6. HOW WE MAY SHARE YOUR INFORMATION

We may share Information collected via the Services as follows:

- **Affiliates:** We share Information within our corporate family for the purposes described in this Privacy Policy and as required or authorized by law. Affiliates are those companies that are under common control of our parent company IDEAL INDUSTRIES, INC., which

is the primary data controller for these purposes.

- **Service providers:** Unless prohibited by applicable law, we may share Information with our third-party service providers that help us operate the Services, such as for website hosting, professional services, analytics, human resources management, customer service, e-mail delivery and auditing. Such service providers must process the Personal Information we share with them only on our behalf and for the same purposes for which the Personal Information was collected. We will not sell or lease your Personal Information to any third parties for marketing purposes.

- **Corporation transaction:** Unless prohibited by applicable law, we may share, transfer or delete your Information if we are involved in a merger, sale, acquisition, divestiture, restructuring, reorganization, dissolution, bankruptcy or other change of ownership or control by Casella or any affiliated company (in each case, whether in whole or in part). If required by applicable law, any such sharing of Information will be reported to regulators in accordance with the applicable law.

- **Other lawful disclosures:** We may also share Information: (i) if we determine that disclosure is necessary to comply with the request of a law enforcement, regulatory agency or other legal process; (ii) to protect the rights, privacy, property, interests or safety of our company or our affiliates, customers, business partners, suppliers, employees or the general public; (iii) to pursue available remedies or limit damages; (iv) to enforce our Terms of Use; (v) to respond to an emergency; and (vi) as otherwise permitted by applicable law.

7. OPTING OUT OF MARKETING COMMUNICATIONS

If you do not wish to receive marketing-related emails from us or prefer us not to process your Personal Information for marketing purposes, please be sure that any relevant boxes on forms we use to collect your Personal Information are unchecked, click the unsubscribe link in one of our marketing emails, or call or email us at 01234 844100 or gdpr@casellasolutions.com. Please note we cannot remove your Personal Information from the databases of third parties (including our Affiliates) who are not service providers with which we have shared your Personal Information prior to your opt-out request. Please contact those third parties directly.

8. LINKS TO OTHER WEBSITES AND SERVICES

The Services may include links to third-party websites and services that we do not operate. When you click these links, you will be directed away from the Services. A link to a third-party digital service does not mean that we endorse it or the quality or accuracy of information presented. If you visit a third-party website or digital service, you are subject to that third party's privacy practices and policies, and we do not accept any responsibility or liability in this regard. This Privacy Policy does not apply to any Personal Information that you provide to these other websites and services.

9. CHILDREN'S PRIVACY

The Services are not directed to or intended for use by minors. Consistent with the requirements of the U.S. Children's Online Privacy Protection Act and similar rules in

other jurisdictions, if we learn that we have received any information directly from a child under age 13, or such other age as set by the laws of jurisdictions outside the U.S. without his or her parent's verified consent, we will use that information only to respond directly to that child (or his or her parent or legal guardian) to inform the child that he or she cannot use the Services and subsequently we will delete that information..

10. SECURITY OF YOUR INFORMATION

We take reasonable precautions intended to help protect Information that we collect, transfer and store. Unfortunately, however, no system or online transmission of data is completely secure. We cannot guarantee the security of Information transmitted to or through the Services. Any transmission is at your own risk and we request that you use appropriate security measures to protect your Information. If you believe that information you provided to us is no longer secure, please notify us immediately using the contact information provided below.

11. RIGHTS OF ACCESS AND DATA RETENTION

Depending on your jurisdiction, you may have statutory rights to access, modify or delete the Personal Information that we hold about you. Exercising such rights must be in accordance with applicable law, and we reserve the right to charge appropriate fees to respond to such request if permitted by applicable law. To exercise these rights, please contact us using the contact information set forth in Section 13 below. Personal Information is retained for the time necessary to accomplish the purpose(s) for which it was collected and processed.

12. INTERNATIONAL TRANSFER

Please note that your Personal Information may be stored and processed on servers in the United States or in other countries where we have affiliates or service providers (both inside and outside the European Economic Area and Canada). The laws on holding personal data in the United States may differ from the laws of other countries. By using the Services, you consent to the transfer, storage and use of your Information in accordance with applicable laws and with this Privacy Policy.

13. HOW TO CONTACT US

We welcome your questions or comments about this Privacy Policy or how we process your Personal Information. Please contact us using the information below and we will respond to you as soon as reasonably possible, but within the time frame set forth in the applicable law.

By Mail:

Regent House
Wolseley Road
Kempston
Bedford
MK42 7JY
UK

By Phone:

+44 (0) 1234844100

By Email:

gdpr@casellasolutions.com