

### ***Privacy Notice Pursuant to Article 13 GDPR***

Arkwin Industries Inc, 686 Main Street, Westbury, NY 11530, United States of America, is the 'Controller' of the information you have provided.

We collect and process your personal data for the purpose of allowing you to access website content. Additionally, your information may be used for the purpose of providing you additional information about our company and products.

The legal basis for processing your information is necessary for the purposes of the overriding legitimate interests pursued by the controller or by a third party.

The legitimate interests of the controller of the information are the processing of your data is required for security purposes of the website and its content and for direct marketing.

We may process the information to Athena Advisors LLC as they are the hosting provider of our website.

Athena Advisors is located outside the European Union. In the event that the recipient country does not ensure a level of data protection equivalent to that of the European Union, the company undertakes to take all appropriate guarantees, either on the basis of an adequacy decision such as that for the Privacy Shield, or, in the absence of such a decision, on the basis of appropriate guarantees, in particular those drawn up on the model of standard contractual clauses made public by the European Commission a copy of which may be requested at the following e-mail address [GDPR@Arkwin.com](mailto:GDPR@Arkwin.com).

The period for storage of your data depends and is determined by factors such as the typical need for such information and storage and space constraints.

You have right to access, modify, rectify, limit and to portability or delete any personal data as well as a right of opposition, if necessary subject to legitimate and imperative reasons, to the processing of these data.

If you wish to exercise your rights, you can contact [GDPR@Arkwin.com](mailto:GDPR@Arkwin.com).

You also have the right to lodge a complaint with a supervisory authority.

You have the right to withdraw your consent to the processing of your data anytime. The withdrawal does not affect the lawfulness of processing based on your consent before its withdrawal.

If you would like to withdraw your consent, please contact [GDPR@Arkwin.com](mailto:GDPR@Arkwin.com).

You have the right to object to the processing of your personal data for marketing purposes at any time.

You have the right to object to the processing of your personal data at any time on grounds relating to your particular situation. We ask you to provide reasons and legitimate interest to back up your objection. In case of a legal objection, we shall no longer process your personal data unless we have compelling legitimate grounds for the processing which override your interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims. We shall inform you on the grounds of our decisions.

## **Privacy Notice for California Residents**

**Effective Date:** January 1, 2020

This California Privacy Notice (this “notice”) applies to “Consumers” as defined by the California Consumer Privacy Act (“CCPA”) as a supplement to Arkwin Industries and its subsidiaries’ (“Company” “us” “we” our”) other privacy policies or notices. Please see also any privacy policy or notice of general applicability posted or referenced on our website [www.Arkwin.com](http://www.Arkwin.com).

To aid in readability, in some places we have abbreviated or summarized CCPA terms or language. Terms defined in the CCPA that are used in this notice shall have the same meaning as in the CCPA.

For more information on this notice or your California privacy rights contact us at 516-333-2640, email us at [ccpa@arkwin.com](mailto:ccpa@arkwin.com) or, write to us at: 686 Main Street, Westbury, NY 11590.

### **PERSONAL INFORMATION WE COLLECT**

We have collected the following categories of personal information from consumers within the last twelve (12) months:

#### **Identifiers**

This may include but is not limited to: Internet Protocol address.

We collect this information Through normal operation and logging of our website server for the purpose of the security of our website.

As permitted by applicable law, we do not treat deidentified data or aggregate consumer information as personal information and we reserve the right to convert, or permit others to convert, your personal information into deidentified data or aggregate consumer information.

Subject to restrictions and obligations of the CCPA, our vendors may also use your personal information for some or all of the above listed business purposes. Our vendors may themselves engage services providers or subcontractors to enable them to perform services for us, which sub-processing is, for purposes of certainty, an additional business purpose for which we are providing you notice.

### **SHARING PERSONAL INFORMATION**

We may share personal information with third parties for a business purpose. In the last twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

- Identifiers

In the last twelve (12) months, we have not sold any personal information.

## CALIFORNIA PRIVACY RIGHTS

We provide California Consumers the privacy rights described in this section. You have the right to exercise these rights via an authorized agent who meets the agency requirements of the CCPA and related regulations. As permitted by the CCPA, any request you submit to us is subject to an identification process. We will not fulfill your CCPA request unless you have provided sufficient information for us to reasonably verify you are the consumer about whom we collected personal information.

If we cannot comply with a request, we will explain the reasons in our response. We will use personal information provided in your request only to verify your identity or authority to make the request and to track and document request responses, unless you also gave it to us for another purpose.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive or clearly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Additionally, you have the right to make or obtain a transportable copy, no more than twice in a twelve-month period, of your personal information that we have collected in the period that is 12 months prior to the request date and are maintaining. Once we receive and confirm your request, we will disclose to you:

- The categories of PI we have collected about you.
- The categories of sources from which we collected your PI.
- The business or commercial purposes for our collecting or selling your PI.
- The categories of third parties to whom we have shared your PI.
- The specific pieces of PI we have collected about you.
- A list of the categories of PI disclosed for a business purpose in the prior 12 months, or that no disclosure occurred.
- A list of the categories of PI sold about you in the prior 12 months, or that no sale occurred. If we sold your PI, we will explain:
  - The categories of your PI we have sold.
  - The categories of third parties to which we sold PI, by categories of PI sold for each third party.

### Deletion Request Rights

Except to the extent we have a basis for retention under CCPA, you may request that we delete your personal information that we have collected directly from you and are maintaining. Our retention rights include, without limitation, to complete transactions and service you have requested or that are reasonably anticipated, for security purposes, for legitimate internal business purposes, including maintaining business records, to comply with law, to exercise or defend legal claims, and to cooperate with law enforcement. Note also that we are not required to delete your personal information that we did not collect directly from you.

### Do Not Sell

We do not sell your personal information as such is defined under the CCPA, and until such time as we change this policy by updating this notice, will treat personal information collected under that policy as subject to a do not sell request.

### Our and Other's Rights

Notwithstanding anything to the contrary, we may collect, use and disclose your personal information as required or permitted by applicable law and this may override your CCPA rights. In addition, we need not honor any of your requests to the extent that doing so would infringe upon our or any other person or party's rights or conflict with applicable law.

### Changes to Our Privacy Notice

We reserve the right to amend this notice at our discretion and at any time. When we make changes to this notice, we will notify you through a notice on our website homepage.

### Contact Information

If you have any questions or comments about this notice, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: 516-333-2640

Website: [www.Arkwin.com](http://www.Arkwin.com)

Email: [ccpa@arkwin.com](mailto:ccpa@arkwin.com)

Postal Address: 686 Main Street, Westbury, NY