

PRIVACY POLICY¹

Effective Date: May 21, 2018

Last Updated: August 2, 2024

Thank you for visiting our websites (the “**Sites**”). This Privacy Policy, as amended from time to time (“**Policy**”), applies to all Sites owned or operated by Lexicon Relocation, LLC (collectively, “**we**”, “**us**”, or “**our**”). This Policy describes how we collect, use, disclose and secure PII (*as hereinafter defined*) provided to us. It also describes use, access, correction, deletion and transfer of PII.

This Policy is designed to comply with all applicable privacy and data protection laws (“**Laws**”).

By using the Sites, you are consenting to this Policy and accepting the practices described herein. We will use PII collected for the purpose of providing, facilitating, and/or arranging relocation-related services. **Note, this Policy applies only to our Sites. If you leave our Sites, this Policy and our practices will no longer apply.**

Data Privacy Framework²

We comply with the EU-U.S. Data Privacy Framework (“**EU-U.S. DPF**”), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (“**Swiss-U.S. DPF**”) as set forth by the U.S. Department of Commerce. We have certified to the U.S. Department of Commerce that we adhere to the EU-U.S. Data Privacy Framework Principles (“**EU-U.S. DPF Principles**”) with regard to the processing of PII received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. We have certified to the U.S. Department of Commerce that we adhere to the Swiss-U.S. Data Privacy Framework Principles (“**Swiss-U.S. DPF Principles**”) with regard to the processing of PII received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this Policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the principles shall govern. To learn more about the Data Privacy Framework (“**DPF**”) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

¹ This Privacy Policy does not apply to The Suddath Companies or its subsidiaries. The Suddath Companies and its subsidiaries have its own Privacy Policy which can be found here.

² This Privacy Policy applies to both non-human resources and human resources data, but only to the extent such human resources data is received solely to provide services as an unaffiliated service provider. For purposes of clarity, this Privacy Policy does not apply to human resources data processed in our capacity as an employer.

As detailed in this Policy, we may transfer your PII to third parties to provide, facilitate, and/or arrange relocation-related services. If we transfer your PII to a third party, such transfer will be in compliance with the EU-U.S. DPF Principles, the UK extension to the EU-U.S. DPF Principles, and the Swiss-U.S. DPF Principles, including the onward transfer liability provisions (collectively, “**DPF Principles**”).

We affirm our commitment to comply with the DPF Principles and we are subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission or any other U.S. authorized statutory body. Please note, under certain circumstances, we may be required to disclose PII in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

If you have any questions or complaints about how we process your PII, please contact us using the contact information listed in the “Contact Us” section. For complaints that cannot be resolved directly with us, and in compliance with the DPF Principles, we commit to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner’s Office (ICO) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) concerning our handling of PII received in reliance on the DPF Principles. Dispute recourse channels are provided free of charge. For any residual, unresolved complaints concerning DPF Principle compliance, you may have the option, under certain conditions, to invoke binding arbitration. For more information regarding binding arbitration, please visit the DPF website located at <https://www.dataprivacyframework.gov/>.

Legal Basis of Processing

Our need to obtain consent to collect and process PII for the purposes listed in this Policy, and our obligation to comply with Laws, are the legal bases for collecting and processing PII.

Data Privacy

We collect and process PII in accordance with Laws and will only disclose PII to third parties when there is a legitimate and lawful reason to do so.

We are responsible for processing PII we receive and similarly responsible for PII we subsequently transfer to third parties. We protect PII by **(i)** performing due diligence on third parties processing PII; and **(ii)** ensuring standard contractual clauses in compliance with Laws are in place with third parties.

We may transfer PII to our companies across our global footprint.

Collection and Use of PII

We have collected or may collect personally identifiable information and sensitive personal information (collectively, "**PII**") when voluntarily submitted to us. Examples of PII we have collected or may collect, include, but are not limited to:

- Name and role details: name; login credentials; company information;
- Contact details: email; address; telephone number; fax number; device ID; internet protocol ("**IP**") address; imported contacts;
- Personal characteristics and demographic information: age; gender; place of birth; marital status; domicile; nationality; job title; language selections; immigration status; work experience;
- Financial information: financial account number; credit/debit card number; compensation;
- Transactional details: billing address; payment method; account holder information; credit or debit card numbers;
- Employer/employee information: start dates, salary, company name, title;
- Education and training: schools/universities attended; course of study; academic grades/rankings/degrees obtained; professional certifications/licenses/memberships; publications; training programs;
- Identification numbers: social security number (SSN/TIN), passport number, driver's license number/VIN; national ID number;
- Biometric and genetics: facial photographs;
- Customer service information: for newsletters or marketing efforts;
- Usage data: relating to visits, clicks, downloads, messages sent/received, and other usage of Sites, mobile apps, platforms, and services offered by us;
- Server log file info: automatically gathered server log file information when users visit websites, including IP address, time/date stamp, browser type,

referring and exit web pages, the files viewed on our Sites and services, your operating system;

- CRM information: customer relationship data and business account/sales information; influence ranking; product utilization ranking; purchase amount ranking; and/or
- Religion/politics/philosophical/union information: other "special categories"-type pieces of information.

We may also combine the PII with demographic, geolocation, and interest-based segment data, along with event-based data from third-party providers.

Use of PII – We are a relocation service provider. PII is used to:

- Provide services and support;
- Communicate and market current offerings and services;
- Authenticate and identify Site users;
- Evaluate and measure Site and service performance;
- Comply with Laws.

PII may also be used in other ways in accordance with your consent.

We do not share, sell, rent or trade PII with third parties for their promotional purposes. We will disclose your PII to third parties only in the ways described in this Policy.

Cookie and Tracking Technology

We use cookies, beacons, tags, scripts, chatbots, replay software, and other similar technologies. These technologies are used to maintain, track, or analyze the functioning of the Sites, serve contextual advertising on the Sites, authenticate users of, or personalize the content on, the Sites, or contact you. We may generate or receive reports based on the use of these technologies.

We use cookies to remember a user's settings and for authentication. You can control the use of cookies; however, if you reject cookies, your ability to use our Sites may be limited.

We gather certain information automatically and store it in log files. This information includes, but may not be limited to, IP addresses, browser type, internet service provider, referring/exit pages, operating system, date/time

stamp, and clickstream data. We may combine this automatically collected log information with PII. We do this to improve services, marketing, analytics, and the Sites.

Interest-Based Advertising - We may partner with a third party to either display advertising on our Sites or to manage our advertising on other sites.

To opt-out of interest-based advertising by participating companies in the following consumer choice mechanisms, please visit:

- Digital Advertising Alliance (DAA)'s self-regulatory opt-out page (<http://optout.aboutads.info/>)
- European Interactive Digital Advertising Alliance (EDAA)'s consumer opt-out page (<http://youronlinechoices.eu>)
- Network Advertising Initiative (NAI)'s self-regulatory opt-out page (<http://optout.networkadvertising.org/>)

Please note this does not opt you out of being served advertisements. You will continue to receive generic advertisements.

Disclosure of PII

We will disclose PII to third parties only in the ways that are described in this Policy.

Compliance with Laws and Investigations

We reserve the right to disclose your PII: **(i)** to governmental agencies, public authorities, or other companies assisting us in fraud prevention or investigation; **(ii)** as required by Laws; and **(iii)** when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, or legal process.

Service Providers

We may disclose PII to third parties to assist with their provision of any subcontracted services. We may use third parties to facilitate and provide relocation services. These third parties are authorized to use PII only as necessary to provide subcontracted services and for no other purpose.

Social Media Features

Our Sites include social media features that may collect some PII. Social media features are hosted by a third party or hosted directly on our Sites. Interactions

with these features are governed by the privacy policy of the third party providing the feature.

Blogs

The Sites offer publicly accessible blogs or community forums. Information provided may be indefinitely read, collected, and used by others. To request removal of your PII from our blogs or community forums, contact privacy@sterlinglexicon.com. Note, we will provide the reasoning and rationale if we are unable to remove your PII.

Commitment to Security

We use reasonable measures and follow generally accepted industry standards to safeguard the security and integrity of PII. We only disclose PII to authorized individuals who have agreed to keep PII secure and confidential. If you have any questions about security on the Sites, email privacy@sterlinglexicon.com.

Your PII Rights

The Laws extend certain protections regarding PII and we will not discriminate or retaliate against anyone exercising such protections. These protections include an individual's right to: **(i)** request a copy of all PII that has been provided to us by that individual; **(ii)** request transmission of their PII directly to another controller; **(iii)** know if we hold any of their PII and the categories of such PII; **(iv)** know the business purpose for which their PII was used; **(v)** know the categories of third parties to which their PII was disclosed; **(vi)** access the specific pieces of PII collected from or about them; **(vii)** correct the PII collected from or about them; **(viii)** limit the use and disclosure of their PII; and **(ix)** delete the PII collected from or about them.

To submit such request, you may contact our toll-free number or complete a form, both of which are located in the section entitled "Contact Us." Please note, any request to act on your PII rights will need to be verified. For your protection, we may require additional information such as, but not limited to, your address and details around the services. If you use an authorized agent to submit a request, you must provide proof, such as a signed written authorization or power of attorney, authorizing the agent to submit such request.

When processing PII is based on consent, you have the right to withdraw consent at any time. However, we may be required and/or allowed by Laws to retain your

PII. When processing PII is based on contract and you withdraw consent, we may not be able to continue providing services and may have to terminate our relationship.

Note, if you are an employee of a third party and do not want us to process your PII, please contact your employer.

Appeals

If we deny your request to act on your rights, you may have the right to appeal such decision. To appeal, complete the same form used to submit your initial request. Texas residents whose appeal is denied may contact the attorney general by clicking [here](#).

Data Retention

We will retain PII for legitimate business purposes or compliance with Laws.

Marketing Preferences

You may sign-up to receive communications from us. If you would like to discontinue receiving communications, you may update your preferences by using the “Unsubscribe” link found in emails, adjusting your member profile on the Sites, or by emailing privacy@sterlinglexicon.com.

Children’s Online Privacy

The Sites are not directed at, or intended for, children under the age of 13. We do not knowingly collect PII on the Sites directly from children. If we become aware that a child has disclosed PII to us without consent from a parent or guardian, we will delete such PII.

Tracking

Currently, various browsers offer a “do not track” or “DNT” option which sends a signal to websites visited by the user about the user's browser DNT preference setting. We do not currently commit to responding to browsers' DNT signals with respect to the Sites, in part, because no common industry standard for DNT has been adopted.

Changes to this Privacy Policy

We reserve the right to modify this Policy at any time. Any changes to the Policy will only apply to activities and PII on a go-forward basis.

Contact Us

If you have any questions, concerns, or comments about our Policy or how we use PII, you may contact us by:

E-mail: privacy@sterlinglexicon.com

Phone: (904) 390-7100

Mail: Lexicon Relocation, LLC, ATTN: Privacy, 815 South Main Street, Jacksonville, Florida 32207

If you would like to act on your PII rights as outlined in the “Your PII Rights” section, contact us at 833-835-1202 or click [here](#). Once we receive the completed form, your request will be processed as outlined in this Policy and in accordance with Laws.

Should you wish to take any complaints or questions further, you have the right to contact your local data protection regulator.