

This Privacy Policy is owned and managed by Distribution Management, Inc. (DM), and describes how DM and its subsidiaries collect, use, share and retain personal information that you provide to DM, or that we collect when you utilize DM's services.

Please note that if you disagree with anything in this Privacy Policy, you should not utilize DM services or provide any personal information to DM.

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1 [Who is Distribution Management](#)

Distribution Management, Inc. (DM) provides the operational infrastructure for its subsidiary companies, specializing in automated order handling, fulfillment and shipping of small packaged goods. In order to deliver your services, it is necessary for us to collect and process personal information. We care about your privacy. This Privacy Policy explains the policies and practices we follow to protect personal information that we hold. This Privacy Policy applies to information we collect about you either through your use of this Website www.distributionmgmt.com or through other means.

The server(s) that make(s) this Site available may be located outside the country from which you accessed this site, but we will collect, process and use personal information only in accordance with this policy and as required by local law in the places in which we operate.

2 [Data Protection Questions](#)

If you have privacy requests or questions not answered in this policy, the DM Privacy Contact may be reached at privacy@distributionmgmt.com

3 Collection of Personal Information

“Personal information” is any information used to identify a person. DM may collect personal information provided by you in order to provide you with products and services you have requested. In most cases, it consists of:

- Full Legal Name
- Email Address
- Postal mailing/ shipping address
- Phone number

DM may collect other information to assist with order fulfillment.

3.1 Information We Collect Through Automatic Data Collection Technologies

We collect other information, such as your IP address, search terms, and site pages you visit while on our site, whenever you visit our site, use our services, or view our online advertisements. The technologies we use for this automatic data collection may include cookies and log data.

You can learn more about how we use cookie data by reviewing our Cookie Policy which can be found in the “Cookie Policy” section of this document. Whenever you use a website, mobile application, or other internet service, certain information is created and retained by the website or application. This happens with our Site as well. We collect technical information when you use our Site, or information that has been made anonymous, such as:

3.1.1 Log data:

Our servers automatically record information when you use our Site, such as your IP address, the type of browser you are using and its settings, the third party website you visited immediately prior to accessing our Site, the operating system you are using, the domain name of your Internet service provider, the search terms you use on our Site, the specific Site pages you visit, type of product selected, the brand, order, and product identifications, and the duration of your visits.

3.1.2 Cookie data:

A “cookie” is data that a website server stores on your computer. Cookies enable websites to recognize your computer and to “remember” your entries as you move from page to page, or even when you revisit the site from time to time using the same computer.

We may also collect information pertinent to the marketing of our products and services. This information may include marketing channels, User Market IDs (CenterPoint, TNMP, etc.), Site brands and product names, contract terms, financial information and other information.

We collect and analyze this information to measure the number of visitors to the different sections of our Site, to evaluate how visitors use our Site and to provide you with advertisements that are relevant and useful to you, unless you have told us not to. We also use the information we collect to understand customer needs and trends, to carry out targeted promotional activities, and to generally help us make our Site more useful to visitors.

We may use your Site data by itself or aggregate it with similar information we have obtained from others. We may share your Site data with our affiliates and other third parties to achieve these objectives. You may obtain a list of our affiliates and third parties with whom we share your Site data by contacting us at the address below.

We reserve the right to use Internet Protocol (IP) addresses to identify a visitor when we feel it is necessary to enforce compliance with our Site's Terms and Conditions, or to:

- fulfill a government request;
- conform with the requirements of the law or legal process; (c) protect or defend our legal rights or property, our Site, or other users; or
- in an emergency to protect the health and safety of our Site's users or the general public.

4 Use, Sharing, Retention & Storage of Personal Information

4.1 How We Use Your Information.

If you are a customer, an agent, an employee, or a job applicant, the personal information we hold, and use is necessary for the performance of the services contract or independent contractor or other agreement to which you are a party.

If you are a prospective customer, the personal information we collect, and use is necessary for our legitimate interest in providing you with information about the services we offer, and about which you have expressed an interest or that we believe will be of benefit to you. Where appropriate, we will obtain your consent at the time we communicate with you.

In some cases, our purpose for collecting the information is because you have expressly consented to our collection and use of your personal information.

We collect your personal information for a variety of reasons. You may provide the information to us directly, or through a tool or product provided by Distribution Management or another organization in the case of our business clients. We collect your personal information, such as name, address, email address and phone number in order to provide the services you have requested. Other examples of personal information that we collect include:

- From business customers, customer relationship information, such as business contact information.

4.2 Doing Business with You.

We use the personal information we have collected to allow us to provide the products and services you have chosen, or to manage and develop our business and operations, including:

- Establishing, managing and terminating business relations with you;
- Reviewing the products and services that we provide to you;

- Informing you of our products and services other than those that you have specifically requested;
- Informing you of products and services carefully selected third parties may wish to offer you;
- Responding to your comments or requests for information;
- Investigating and preventing fraudulent activities, unauthorized access to the services and other illegal activities;
- Protecting us against error, fraud, theft, and damage to our goods and property;
- Enabling us to comply with applicable law or regulatory requirements;
- For any other purposes about which we notify customers and users; and
- For any other reasonable business purpose to which you consent.

4.3 Email communications:

If you send us an email with questions or comments, we may use your email address to respond to your questions or comments, and we may save your questions or comments for future reference. We may email you when:

- You have applied for employment with us;
- You request information about our company;
- It relates to purchases you have made from us (e.g., product updates, customer support, etc.);
- You consented to being contacted by email for a particular purpose.
- We are sending you information about our other products and services, offers, promotions and our newsletters, if this is in accordance with your marketing preferences. However, you will always be able to opt out of such communications at any time. See the 'Your Choices' section below.

4.4 How DM uses Preference Based Advertising, Analytics and Services

We do not currently share your information that we collect for preference-based advertising purposes and we do not currently have any plans to do so through this Site.

If we do in the future work with third parties for preference-based advertising, then we will do so in accordance with this section, and you can opt out as explained below. Such third parties may include third party advertising networks and website analysis firms who use cookies and web beacons to collect non-personally identifiable information when you visit our Site and third-party sites.

The information collected through cookies and/or web beacons, including your IP address, web browser, pages viewed, time spent on pages, and links clicked, is often used by these advertising networks to serve you with advertisements, while you are on our Site and/or on third party sites, that better reflect your preferences and needs. This information may be used by Distribution Management and these third parties to analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on our products and services, and better understand your online activity. For more information on how this type of advertising works, go to <http://www.aboutads.info/>

4.5 Who does DM Share Information with and Why

We may share your personal information with one or several of our business partners to make initial determination of the services you may need to facilitate our business operations. We may also share your information to protect and defend the rights and property of Distribution Management.

4.5.1 Third Party Providers

We may use third parties to assist in fulfilling your services requests or providing other important information to you. We require all such services providers to act in compliance with this Privacy Policy. We may also share your PII with third parties, including our affiliates, or with employees, agents, consultants and other parties who require the information to assist us to establish, maintain and manage our business relationship with you. Further, we may share your personal information with our partners and affiliates to promote other services to you that you might like or to show you ads in which you might be interested.

4.5.2 Email Communications

We may share your email contact information with our partners to assist with marketing our products and services. You may unsubscribe from receiving future commercial email communications from us by clicking the "unsubscribe" link included at the bottom of any marketing emails we send, or by emailing us as provided in the "Contact Us" section below. However, we reserve the right to send you transactional emails such as customer service communications in connection with the products you have purchased. For security reasons, we do not recommend that you send PII, such as passwords, social security numbers, or bank account information, to us by email.

4.5.3 Transfer of Assets

We do not sell or lease personal information or provide a list of our customers to third parties. However, as we continue to develop our business, we may sell or purchase assets or entities. If another entity acquires us or all (or substantially all) of our assets, the information we have about you will be transferred to and used by this acquiring entity. Also, if any bankruptcy or reorganization proceeding is brought by or against us, all such information may be considered an asset of ours and as such may be sold or transferred to third parties.

4.5.4 Legal Necessity

Notwithstanding anything herein to the contrary, we reserve the right to disclose any information about you if we are required to do so by law, with respect to copyright and other intellectual property infringement claims, or if we believe that such action is necessary to:

- fulfill a government request;
- conform with the requirements of the law or legal process;
- protect or defend our legal rights or property, or our Site; or
- in an emergency to protect the health and safety of our Site's users or the general public.

4.6 What Choices do you have about our use of your information?

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- Cookies. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent.
- Your Contact Information. If you have previously emailed us and would like us to amend or delete your contact information from our files, please contact us at the email address below.
- Other Information. If at any point you believe the personal information we hold about you is incorrect, you want us to correct or delete that information, or you no longer want us to hold that information or contact you, you can contact us at the email address below.

You may have additional rights concerning your personal information if you are a California resident or reside in the European Union. These can be found in the “Special Notice for California Residents” and “Information for Residents of European Union” sections of this document.

4.6.1 Accuracy of Personal Information

It is important that the personal information we hold about you is accurate and current. Distribution Management requires you to keep us informed of changes to your personal information. If your registration information changes, please send your request to us at the email address privacy@distributionmgmt.com. We take reasonable steps to verify your identity prior to honoring any such requests to help protect your privacy and security.

4.6.2 Accessing Your Personal Information

If you want to know what personal information Distribution Management holds about you or wish to change personal information that is inaccurate or out of date, or to withdraw your consent to our use of your personal information, please contact us at the email address below. It may not always be possible to completely remove or modify information in our databases, although we will make reasonable efforts to do so upon your request. We do not control how our partners retain, store and destroy data they have accessed in connection with assisting with providing our services. You should check their websites for more information on their practices.

5 Safeguarding Personal Information

We take the security of your information very seriously. We have implemented industry-standard security measures to protect against the loss, misuse and alteration of the information under our control. To help ensure the confidentiality of your personal information, it is important for you to protect against unauthorized access to your password and to your computer. Be sure to sign off when finished using a shared computer.

Distribution Management will endeavor to safeguard personal information using methods that are appropriate to the sensitivity of the information. We have implemented security measures we consider reasonable and appropriate to protect against the loss, misuse and alteration of the personal information under our control. However, we cannot guarantee or warrant the security of any information you disclose or transmit to us online and are not responsible for the theft, destruction, or inadvertent disclosure of your personal information.

In the unfortunate event that your information is compromised, we may notify you by e-mail or U.S. mail to the last e-mail address or postal address you have provided us in the most expedient time reasonable under the circumstances, or as otherwise required by applicable law. We may delay notification as necessary while we take measures to determine the scope of the breach and restore

reasonable integrity to our system as well as for the legitimate needs of law enforcement. From time to time we evaluate new technology for protecting information, and when appropriate, we upgrade our information security systems

6 Privacy of Children's Information

Our Sites are not directed to children. We do not sell products or services for purchase by children. We will not knowingly collect personal information from children. If you are a parent or guardian of a child under the age of 13 and believe he or she has disclosed personally identifiable information to us, please contact us at the email address privacy@distributionmgmt.com. A parent or guardian of a child under the age of 13 may review and request deletion of such child's personally identifiable information as well as prohibit the use of that information.

7 Special Notice for California Residents

If you are a resident of the State of California, you have certain rights under California law to request information concerning our data sharing activities with third parties.

This Privacy Notice for California Residents supplements the information contained in our Privacy Policy above and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). This notice is intended to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this notice.

7.1 Information Collected:

For information concerning specific information collected, our use, sharing, retention and storage of your personal information see Section 3 above.

Exclusions:

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, such as:
- Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
- Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

7.2 Information Sources:

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete on our website.
- Indirectly from you. For example, from observing your actions on our website or interactions with our partners.

7.3 Use of Personal information

See Section 3 above.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

7.4 Sharing of Personal Information

See Section 4 above.

In the preceding twelve (12) months, Distribution Management has disclosed personal information to the following categories of third parties:

- Service providers and subcontractors of Distribution Management for the purposes of delivering services on behalf of Distribution Management
- Event sponsors, co-sponsors, and venues for the purposes of event registration.
- Suppliers and channel partners for the purpose of delivering products and services.

7.5 Sales of Personal information

In the preceding twelve (12) months, Distribution Management has NOT sold personal information. Under the CCPA, the sale of personal information means “selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s personal information by the business to another business or a third party for monetary or other valuable consideration. If we do sell any personal information, we will update this privacy policy to list the categories of personal information sold.

7.6 Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

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. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:

- If applicable, the categories of personal information we have sold and the categories of personal information that we sold about the consumer and the categories of third parties to whom the personal information was sold by category or categories of personal information for each category of recipient to whom or which the personal information was sold; and
- If we disclosed your personal information for a business purpose, identifying the business purpose and the personal information categories that each category of recipient obtained.

Deletion Request Rights:

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights:

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us at privacy@distributionmgmt.com. Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format: We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance, specifically by electronic mail communication.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly 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.

Personal information Sales Opt-Out and Opt-In Rights:

We do not sell the personal information of consumers. If you are 16 years of age or older, you have the right to opt of future sales of data. We do not sell the personal information of consumers we actually know are less than 16 years of age, unless we receive affirmative authorization (the "right to opt-in") from either the consumer who is between 13 and 16 years of age, or the parent or guardian of a consumer less than 13 years of age. Consumers who opt-in to personal information sales may opt-out of future sales at any time.

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back into personal information sales at any time by visiting our website and sending us a message. We will only use personal information provided in an opt-out request to review and comply with the request.

To exercise any of your rights under the CCPA, please refer to the Data Protection Questions section above for our contact information. All privacy-related requests and inquires can also be communicated by submitting a request to privacy@distributionmgmt.com.

Non-Discrimination:

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.

- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

Shine the Light: California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please refer to the Data Protection Contact section above.

8 Information for Residents of European Union

Residents of the European Union are afforded certain rights as a data subject under the General Data Protection Regulation (2016/679). If you reside within the European Economic Area (EEA), our processing of your personal information will be legitimized as follows:

- Whenever we require your consent for the processing of your personal information such processing will be justified pursuant to Article 6(1) lit. (a) of the General Data Protection Regulation (EU) 2016/679 ("GDPR"). This article in the GDPR describes when processing can be done lawfully.
- If processing of your personal information is necessary for the performance of a contract between you and Distribution Management or for taking any pre-contractual steps upon your request, such processing will be based on GDPR Article 6(1) lit. (b). If this data is not processed, Distribution Management will not be able to execute a contract with you.
- Where processing is necessary for us to comply with a legal obligation (e.g. detection of fraud) we will process your information on basis of GDPR Article 6(1) lit. (c).
- Where processing is necessary for the purposes of Distribution Management's legitimate interests, such processing will be made in accordance with GDPR Article 6(1) lit. (f), for example to detect fraud.
- You may also receive personalized advertising where you indicate to Distribution Management specific interests by requesting information about a product or service or by otherwise communicating your marketing preferences.

Transferring personal information from the EU to US: Distribution Management's operations are based in the United States. By using our sites or providing any personal information to us, where applicable law permits, you consent to the transfer, processing, and storage of such information in the United States. The United States has not sought nor received a finding of "adequacy" from the European Union under Article 45 of the GDPR.

For more information concerning our use, sharing, retention and storage of your personal information see Section 3 above.

This Privacy Policy is intended to provide you with information about what personal information Distribution Management collects about you and how it is used. The European Union's General Data Protection Regulation and other countries' privacy laws provide certain rights for "Data Subjects" (these are persons that can be identified). As a Data Subject under GDPR, you have the following rights:

- The right to be informed
- The right of access
- The right of rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object to processing
- The right NOT to be profiled or evaluated based on automated processing

To exercise any of your rights under the GDPR, please refer to the Data Protection Questions section above for our contact information. All privacy-related requests and inquiries can be communicated by submitting a request to privacy@distributionmgmt.com.

9 Modifications to this Privacy Policy

Distribution Management may from time to time make changes to this Privacy Policy to reflect changes in legal or regulatory obligations or changes in the manner in which we deal with personal information. We will post any revised version of this Privacy Policy on our Site. Any changes will be effective on the effective date stated in the revised Privacy Policy. We reserve the right to amend this Privacy Policy at any time, for any reason, without notice to you, other than the posting of the amended Privacy Policy on our websites. If there are significant changes, we may provide more prominent notice or obtain your consent as required by law. If you do not wish to accept the changes, you should cease using the Site or Services, or providing personal information to Distribution Management. Your continued use of the Site after we have posted a revised Privacy Policy you will be bound by the revised Privacy Policy.

10 Linked Sites

This Policy does not apply to your use of unaffiliated websites to which our Site is linked. Distribution Management is not responsible for the privacy practices or the content on linked sites. We recommend that you carefully read the privacy policies of each site you visit.

11 Sole Statement

This Privacy Policy as posted on this Site is the sole statement of our privacy policy with respect to this Site, and no summary, modification, restatement or other version thereof, or other privacy statement or policy, in any form, is valid unless we post a new or revised policy to the Site.

12 Questions, Concerns or Complaints

To get more information about Distribution Management's privacy and information security practices, or if you:

- have questions or comments about our Privacy Policy;
- wish to make corrections to any personal information you have provided;
- want to opt-out from receiving future commercial correspondence, including emails, from us or our affiliated companies; or
- wish to withdraw your consent to sharing your personal information with others, contact us as follows:

By Email: privacy@distributionmgmt.com