

NOR-LAKE PRIVACY POLICY

Nor-Lake, Incorporated
Hudson, Wisconsin, USA
Legal Information

Your privacy is very important to us. This Privacy Policy discloses how Nor-Lake, Incorporated (“Nor-Lake”) collects, protects, uses and shares personal information gathered about you, in conformance with the applicable law. All personal information is collected in a fair and non-intrusive manner, with your voluntary consent. Personal Information is not accessible to anyone outside the specific function for which it is collected. Nor-Lake respects the privacy of employees and job applicants, customers and other visitors to our websites who may choose to provide personal information. We recognize the need for appropriate protection and management of personal information that you provide to us. This Privacy Policy will assist you to understand what types of information we may collect, how that information may be used, and with whom the information may be shared.

In an effort to comply with the law, and our commitment to protect your personal information, we provide the following, which discloses our policies.

What type of information do we collect?

Personal Information is any information concerning the personal or material circumstances of an identified or identifiable individual. An identifiable person is one who can be identified, directly or indirectly, by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity.

Personal Information shall include but is not limited to: identifying information such as name, home address, home telephone number, e-mail address, Social Security number, financial information and employment-related information such as may be found on resumes, applications, background verification information, or in employment references.

We will not collect sensitive Personal Information, except to comply with Affirmative Action data requirements. Sensitive Personal Information can include but is not limited to: information pertaining to gender, disabilities and veteran status.

Cookies — Internet Users

In addition to Personal Information, we use data collection devices such as "cookies" on certain web pages to help analyze our web page flow and measure promotional effectiveness. Cookies are pieces of information a website sends to an individual's hard drive while they are viewing the website. Cookies allow the website to remember important information that will make your visit to the site more useful. We use cookies to help improve your future visits. If you do not wish to receive a cookie or if you wish to set your browser to warn you each time a cookie is being sent,

or if you wish to turn off all cookies, use the options on your browser to assist you. The “Help” option on your browser may assist you in changing your cookie preferences. Please note that by turning cookies off, you will not have access to many features available on our website.

Children and Data Collection

We care about the safety of children. We won't knowingly allow anyone under 13 to provide us any personally identifying information. Children under 13 years of age are required to obtain the express permission of a parent or guardian before submitting any Personal Information about themselves (such as their names, e-mail addresses, and phone numbers) over the Internet.

Our Use of Your Information

We use your Personal Information to facilitate the services you request. We have tailored our Privacy Policy to adequately inform you of the use of your Personal Information.

Collection and Use of Employee Personal Information

Nor-Lake also collects Personal Information from its employees and applicants (human resource data) in connection with administration of its Human Resources programs and functions. These programs and functions include, but are not limited to: job applications and hiring programs, compensation and benefit programs, performance appraisals, training, access to Nor-Lake facilities and computer networks, employee profiles, internal intranet employee directories, Human Resource recordkeeping, Affirmative Action data, and other employment related purposes.

It is the policy of Nor-Lake to keep all past and present employee information private from disclosure to third parties. There are certain business related exceptions and they are:

1. To comply with county, state or federal agency requests;
2. Inquiries from third parties with a signed authorization from the employee to release the information, except in situations where limited verbal verifications are acceptable (see below);
3. Third parties with which Nor-Lake has contractual agreements to assist in administration of company sponsored benefits.

Verifications of Employment

Prospective employers, state agencies, financial institutions, and residential property managers routinely contact Nor-Lake requesting information on a former or current employee's work history and salary. All such requests of this type shall be referred to and completed on a confidential basis by the Human Resources Department or Payroll Department.

For written verification of employment requests, information will be provided on the form only when it is accompanied by an employee's signed authorization to release information. The form will be returned directly to the requesting party and filed as part of the Human Resources or Payroll Department's confidential records.

Medical Information

Nor-Lake is compliant with federal HIPAA regulations and only utilizes information related to the company sponsored healthcare plan on a "need to know" basis for administration of the healthcare plan.

Collection and Use of Individual Customer Information

Nor-Lake will not collect individual customer Personal Information, unless the customer contacts Nor-Lake directly.

Sharing of Personal Information

We may share Personal information with our service providers, consultants and affiliates for our internal business purposes. Except as described in this Privacy Policy, Nor-Lake will not share Personal Information with a third party, unless a customer requests, consents to such disclosure, or disclosure is required or authorized by law. Nor-Lake reserves the right to disclose Personal Information to a third party if a law, regulation, search warrant, subpoena, or court order legally requires or authorizes us to do so. Nor-Lake also reserves the right to disclose and/or transfer Personal Information to a third party in the event of a proposed or actual purchase, sale, lease, merger, amalgamation or any other type of acquisition, disposal, or financing of all or any portion of Nor-Lake or of any of the business or assets or shares of Nor-Lake.

Storage, Retention and Accuracy of Personal Information

Nor-Lake insures that Personal Information is safeguarded against loss, access, use, modification, disclosure or other misuse. All reasonable steps are taken to prevent unauthorized use or disclosure of your Personal Information.

Nor-Lake will retain your Personal Information only for as long as necessary to fulfill the purpose(s) for which it was collected and to comply with applicable laws, and your consent to such purpose(s) remains valid after termination of our relationship with you.

We take all reasonable steps to insure that your Personal Information is accurate, up-to-date, complete, relevant and not misleading.

Contact Information

You may contact the Human Resource Manager to access, correct or delete your Personal Information. If necessary, the Human Resource Manager will contact another employee to assist in completing your requested task.

If you have any questions or complaints, please contact the Human Resource Manager ("HR Manager"). The HR Manager can be reached by telephone at: (715) 386-2323 or 1-800-955-5253; by Facsimile at: (715) 386-6149; by email at: psederstrom@norlake.com or by mail at Nor-Lake, Incorporated, 727 Second Street, Hudson, WI 54016. We will address your concern and attempt to resolve any problem.

Links to Non-Nor-Lake Web Sites and Third Parties

Please note that the Nor-Lake web site may contain links to other web sites for your convenience and information. Nor-Lake does not control those sites or their privacy practices, which may differ from www.norlake.com. Nor-Lake's privacy policy cannot and does not apply to external Web areas. We do not endorse or make any representations about third party web sites. The personal data you choose to give to unrelated third parties is not covered by the Nor-Lake privacy policy. We encourage you to review the privacy policy of any company or website before submitting your Personal Information. Some third parties may choose to share their personal data with Nor-Lake; that sharing is governed by that third party company's privacy policy.

Safe harbor Compliance

Nor-Lake is in compliance with the U.S. Department of Commerce Safe Harbor requirements regarding the transfer of personal information from European Union member countries to the United States. Nor-Lake has been Self-Certified in accordance with the EU Directive on Personal Data Protection. The principles of Safe Harbor compliance are notice, choice, onward transfer, security, data integrity, access and enforcement. Additional information about Safe Harbor principles and certification process can be found at www.export.gov/safeharhor.

Members of the European Union

If you are a resident of a Member State of the European Union and have any concerns or complaints, please first address these issues to the HR Manager. Nor-Lake, Incorporated is located in the United States, as are the servers that make our websites available. All matters relating to privacy issues and websites are governed by the laws of the United States and the State of Wisconsin. If the HR Manager does not satisfactorily address a complaint within thirty (30) days, any dispute, controversy or claim shall be settled by an arbitration administered by an arbitration agency, such as the American Arbitration Association ("AAA"). All arbitrations will

be conducted in English. Judgment rendered by the arbitrator may be entered in any court having jurisdiction. The costs of the arbitration will be borne equally by the parties. Wisconsin, U.S.A. shall be the site of all hearings, and such hearings shall be before a single arbitrator. You may also submit complaints to the Federal Trade Commission at <http://www.ftc.gov/ftc/complaint.htm> or via telephone at (202)382-4537.

Changes to our Privacy Policy

This Privacy Policy may be amended at any time, without prior notification.