



# Privacy Policy

**EFFECTIVE DATE: JANUARY 1, 2023**

This Privacy Policy describes how Acosta Inc. (“we” or “Acosta”) collects, uses, shares and protects information when you interact with our main website ([www.acosta.com](http://www.acosta.com)), as well as all of our websites, emails we send, social media accounts, and online services (our “Services”). This Privacy Policy explains the following:

- [How We Collect Information](#) and the [Types of Information We Collect](#)
- [How We Use Cookies and Other Tracking Technologies](#)
- [How We Use Your Information](#)
- [How We Share Your Information](#)
- [How We Protect and Store Your Information](#)
- [Your Privacy Options](#)
- [Children’s Information](#)
- [Jurisdiction-Specific Notices](#)
  - [California Residents](#)
  - [Virginia Residents](#)
  - [Colorado Residents](#)
  - [Connecticut Residents](#)
  - [EEA, Switzerland, or UK Residents](#)
- [Updates to this Privacy Policy](#)

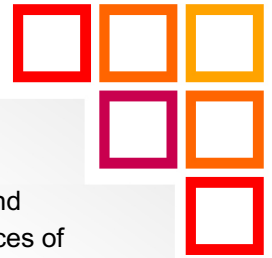
Please note that this Privacy Policy does not apply to non-Acosta websites or services that state that they are offered under a different privacy policy. Please review the privacy policies on those websites and applications directly to understand their privacy practices.

For questions about our privacy practices, contact us at: [privacy@acosta.com](mailto:privacy@acosta.com) or write to us at the address provided below.

## 1. HOW WE COLLECT INFORMATION

We may collect information about you by the following means:

- Directly from you, when you provide information to us or interact with us, our clients, or our affiliates’ Services, including the Services of Mosaic Sales Solutions US Operating Co., LLC; The CORE Group, Inc.; Premium Retail Services, LLC; ActionLink Services, LLC; and Mosaic Sales Solutions US Operating Co., LLC d/b/a Frontline Marketing;
- Automatically from you, when you utilize or interact with our Services;
- From service providers who collect information on our behalf in order to provide services to us;



- From online advertising companies who may share information about the marketing and advertisements you have seen or clicked on, and from social networks and other sources of publicly available data; and
- From other third-party sources that provide consumer data, such as information about your interests, demographic information, consumer behaviors, and marketing inferences.

## 2. INFORMATION WE COLLECT

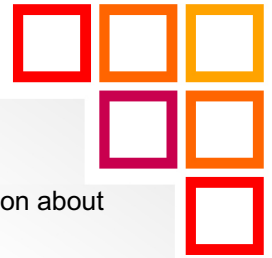
In order to better provide you with our Services, we may collect the following categories of information:

- *Contact information* and any other information you choose to include when you communicate with us via e-mail, mail, phone or other channels;
- *Transactional information* including payment information and payment history if you engage in transactions through the Services;
- *Demographic information* including postal code or ZIP, age, preferences, gender, interests and favorites;
- *Inferences* including information about your preferences, interests and purchasing tendencies;
- *Device information* when you utilize our technology platforms, including as model, serial number, device location, usage data, and operating information;
- *Survey information* in response to questions we may send you through the Services, including for feedback and research purposes;
- *User content* you may provide to publicly post via the Services (e.g., comments);
- *Online user activity* described in the next section; and
- *Biographical information* when you inquire about or apply for a position with us.
- If you provide us with information regarding another individual, you represent that you have that person's consent to give us his or her information and to permit us to use the information in accordance with this Privacy Policy.

## 3. ONLINE USER ACTIVITY, COOKIES AND INFORMATION COLLECTED BY OTHER AUTOMATED MEANS

When you interact with the Services, certain information about your use of our Services is automatically collected. This includes:

- *Usage details* about your interaction with our Services (such as the date, time, and length of visits, and specific pages or content accessed during the visits, search terms, frequency of the visits, and referring website addresses);
- *Device information* including the IP address and other details of a device that you use to connect with our Services (such as device type and unique device identifier, operating system, browser type, mobile network information, and the device's telephone number); and



- *Location information* where you choose to provide the website with access to information about your device's location.

Much of this information is collected through cookies, web beacons, and other tracking technologies, which may be operated by our partners who assist us in serving ads or providing other services to you.

Your browser or device may include "Do Not Track" functionality. If you have selected this feature, we will continue to use cookies and other tracking technologies to provide you with the features of our website but will block third-parties from being able to collect data regarding your interactions with our website via cookies.

#### 4. HOW WE USE YOUR INFORMATION

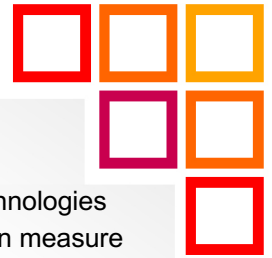
We use the information we collect from you to:

- Provide our Services to you and related important notices;
- Respond to your requests, questions and comments and provide customer support;
- Monitor the performance of our Services including metrics such as total number of visitors, traffic, and demographic patterns;
- Interact with you, including to notify you regarding products and services that may be of interest to you and inform you about important changes to this Privacy Policy, our Terms or other policies;
- Tailor the content we display to you in our Services and communications, including advertising, and offer products and services that we believe may be of interest to you;
- Manage, operate, and improve the Services and grow our business, including understanding our customer base and the effectiveness of our marketing, events, promotional campaigns, and publications, and diagnose or fix technology problems;
- Evaluate, recruit, and hire personnel; and
- Comply with legal requirements and industry standards, detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal, and protect the rights of Acosta, you, or others.

We may use and share information in an aggregated or de-identified manner at our discretion, including for research, analysis, modeling, marketing, and improvement of our Services.

#### 5. HOW WE SHARE YOUR INFORMATION

- *Service Providers.* We may share your information with service providers that we believe need the information to perform a technology, business, or other professional function for us such as billing and collection, IT services, maintenance and hosting of our Services, payment processors, marketing partners, accounting, auditing, and tax services, and other professional services.



- *Analytics.* We partner with analytics providers, who collect information via tracking technologies on our websites to assist us with measuring visits and traffic on our websites so we can measure and improve the performance of the websites.
- *Social Media.* If you interact with us on social media platforms, the platform may be able to collect information about you and your interaction with us. If you interact with social media objects on our Services (for example, by clicking on a Facebook “like” button), both the platform and your connections on the platform may be able to view that activity. To control this sharing of information, please review the privacy policy of the relevant social media platform.
- *Affiliates.* We share information with other entities in our corporate family, for purposes consistent with this Privacy Policy.
- *Corporate Event.* We reserve the right to transfer to another entity or its affiliates or service providers some or all information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information the same as described in this Privacy Policy.
- *Legal.* We share information where necessary to comply with applicable law, to respond to requests from law enforcement agencies or other government authorities or third-parties, as permitted by law and without your consent when it is necessary to protect our customers, employees, or property; in emergency situations; or to enforce our rights under our terms of service and policies.

## 6. HOW WE PROTECT AND STORE YOUR INFORMATION

We use a combination of physical, technical, and administrative safeguards to protect the information we collect through the Services. While we use these precautions to safeguard your information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf.

## 7. YOUR PRIVACY OPTIONS

You may have certain choices when it comes to how we collect and use your information:

- **Email marketing.** If at any time you no longer wish to receive marketing communications from us, you can click the unsubscribe link at the bottom of any email or email us at [privacy@acosta.com](mailto:privacy@acosta.com).
- **Online activity tracking.** You have several options to prevent our collection of information regarding your online activity:
  - You can opt out or set preferences regarding cookies when a device you utilize visits our websites, by accessing our cookie management tool.
  - You can usually modify your browser setting to disable or reject cookies across the internet. Note that if you delete your cookies or if you set your browser to decline cookies, some features of our website or Services may not function properly or be available.

## 8. CHILDREN'S INFORMATION



We do not knowingly or intentionally gather personal data about children who are under the age of 13. If a child has provided us with personal data, a parent or guardian of that child may contact us at [privacy@acosta.com](mailto:privacy@acosta.com) to have the information deleted from our records. If we learn that we have inadvertently collected the personal data of a child under the minimum age depending on jurisdiction, we will take steps to delete the information as soon as possible and cease the use of that information in accordance with applicable law.

## 9. JURISDICTION-SPECIFIC NOTICES

Certain jurisdictions may provide additional rights to individuals with respect to the collection and use of personal data that we have collected. For example, you may have the right to request that we: (i) disclose to you any personal data that we have about you; (ii) correct or delete personal data that we have about you (subject to certain exceptions); or (iii) not disclose or sell your information to a third-party (excluding qualified service providers). If you are a resident of any of the following jurisdictions, review your location to learn more.

### A. California

#### Your California Privacy Rights

California's "Shine the Light" law permits customers in California to request certain details about how certain types of their information are shared with third-parties for those third-parties' own direct marketing purposes. If you are a California resident, you may opt-out of such sharing by emailing us at [privacy@acosta.com](mailto:privacy@acosta.com).

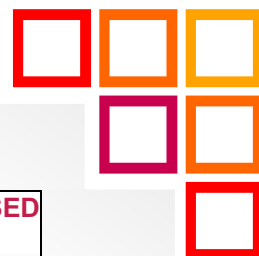
#### California Consumer Privacy Act

The California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 ("CCPA"), provides California residents with certain rights related to our collection, use, sharing or disclosure of their personal data. If you are a resident of California, you have the right to request to know what personal data has been collected about you, and to access that information. You also have the right to request deletion of your personal data, though exceptions under the CCPA may apply. You also have the right to request correction of inaccurate personal data and to request to limit the disclosure and use of any of your sensitive personal data. You have the right to be free from discrimination based on your exercise of your CCPA rights.

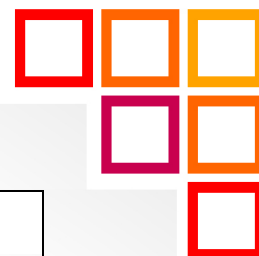
To the extent that we collect personal data that is subject to the CCPA, we list the categories of personal data that we collect and use and whether we sell or share that personal data below.

Entities to whom we disclose information for business purposes are service providers, which are companies that we engage to conduct activities on our behalf. Service providers are restricted from using personal data for any purpose that is not related to our engagement.

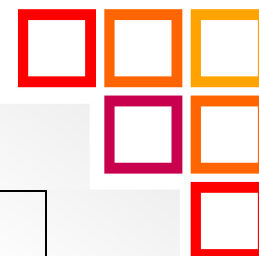
The sources of this personal data are described in the "Information We Collect" section above. We collect this personal data for the purposes described in the "How We Use Your Information" section above.



CATEGORY	EXAMPLES	SOLD OR SHARED	CRITERIA USED TO DETERMINE RETENTION PERIODS	DISCLOSED TO
Personal Identifiers	name, email address, phone number, and contact address, username, social media handle and basic account information, unique identifiers (such as those assigned in cookies)	Not sold or shared	The duration of our relationship with you; the length of time necessary to complete a transaction; whether your personal data is a sensitive type; whether you specifically consented to retain the data; and our legal, contractual or similar obligations to retain or delete the data.	Service providers and affiliates
Personal data categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	name, signature, address, telephone number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information.	Not sold or shared	The duration of our relationship with you; the length of time necessary to complete a transaction; whether your personal data is a sensitive type; whether you specifically consented to retain the data; and our legal, contractual or similar obligations to retain or delete the data.	Service providers and affiliates
Commercial information	transaction information, billing records, payment records, order history	Not sold or shared	The duration of our relationship with you; the length of time necessary to complete a transaction; whether your personal data is a sensitive type; whether you specifically consented to retain the data; and our legal, contractual or similar obligations to retain or delete the data.	Service providers and affiliates
Biometric Information	Not collected	Not collected	Not collected	Not collected
Internet or other similar network activity	unique numerical identifier, cookie or tracking pixel	Not sold or shared	The duration of our relationship with you; the length of time	Service providers



	information, device ID, browsing history, search history, IP address, interaction with a website, interaction with an application, or interaction with advertisement		necessary to complete a transaction; whether your personal data is a sensitive type; whether you specifically consented to retain the data; and our legal, contractual or similar obligations to retain or delete the data.	and affiliates
Geolocation information	coarse information (e.g., ZIP code, IP address), device location	Not sold or shared	The duration of our relationship with you; the length of time necessary to complete a transaction; whether your personal data is a sensitive type; whether you specifically consented to retain the data; and our legal, contractual or similar obligations to retain or delete the data.	Service providers and affiliates
Audio, electronic, visual, thermal, olfactory, or similar information	call recording (e.g., customer service calls)	Not sold or shared	The duration of our relationship with you; the length of time necessary to complete a transaction; whether your personal data is a sensitive type; whether you specifically consented to retain the data; and our legal, contractual or similar obligations to retain or delete the data.	Service providers and affiliates
Inferences drawn from other personal data	interests, preferences	Not sold or shared	The duration of our relationship with you; the length of time necessary to complete a transaction; whether your personal data is a sensitive type; whether you specifically consented to retain the data; and our legal, contractual	Service providers and affiliates



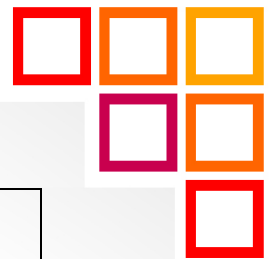
			or similar obligations to retain or delete the data.	
--	--	--	--	--

When you apply for a job with Acosta, information may be collected about you in multiple ways: you may provide it to us in connection with your application; we may make observations in the application process or collect information from public information sources; or you may authorize us to collect information from other sources, such as a former employer or reference.

The following table describes our practices with regard to information submitted in the job application process. If you use our website in the job application process, additional information may be automatically collected, as described above.

<b>CATEGORY</b>	<b>EXAMPLES</b>	<b>SOLD OR SHARED</b>	<b>CRITERIA USED TO DETERMINE RETENTION PERIODS</b>	<b>DISCLOSED TO</b>
Personal Identifiers	name, email address, phone number, and contact address, username, social media handle	Not sold or shared	The duration of our relationship with you; the length of time necessary to complete a transaction; whether your personal data is a sensitive type; whether you specifically consented to retain the data; and our legal, contractual or similar obligations to retain or delete the data.	Service providers
Protected Classifications	gender, race and ethnicity, date of birth	Not sold or shared	The duration of our relationship with you; the length of time necessary to complete a transaction; whether your personal data is a sensitive type; whether you specifically consented to retain the data; and our legal, contractual or similar obligations to retain or delete the data.	Service providers
Geolocation Information	coarse information (e.g., ZIP code, IP address)	Not sold or shared	The duration of our relationship with you; the length of time necessary to complete a transaction; whether your personal data is a sensitive type; whether you specifically consented to retain the data; and our legal, contractual or similar obligations to retain or delete the data.	Service providers





Professional or employment-related information	employer's name, employer's address	Not sold or shared	The duration of our relationship with you; the length of time necessary to complete a transaction; whether your personal data is a sensitive type; whether you specifically consented to retain the data; and our legal, contractual or similar obligations to retain or delete the data.	Service providers
Education Information	institutions attended, degrees and certifications attained	Not sold or shared	The duration of our relationship with you; the length of time necessary to complete a transaction; whether your personal data is a sensitive type; whether you specifically consented to retain the data; and our legal, contractual or similar obligations to retain or delete the data.	Service providers

In certain circumstances, you may submit your application for employment through a third-party service that displays our job posting. We do not control the privacy practices of these third-party services. Please review their privacy policies carefully prior to submitting your application materials.

Rights to Know, Request Access to, Correct and Delete Personal Data and Right to Limit Use and Disclosure of Sensitive Personal Data

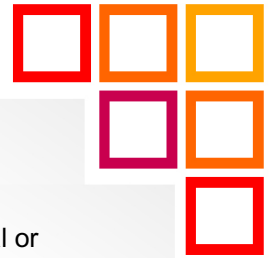
You may submit a request to exercise your rights under the CCPA through one of two means:

- By emailing us at [privacy@acosta.com](mailto:privacy@acosta.com)
- By calling us at 1-800-377-2754

Upon submission of your request, we will contact you (via the email address provided in your request) with instructions on how to verify the request and your identity, after which we will check our records for matching information, and aim to complete requests as soon as reasonably practicable and consistent with any applicable laws. You may authorize another individual or a business registered with the California Secretary of State, called an authorized agent, to make requests on your behalf through these means. We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

**B. Virginia**

Virginia residents have certain rights around Acosta's collection, use, and sharing of their personal data. Acosta does not sell your personal data and will not do so in the future without



providing you with notice and an opportunity to opt-out of such sale as required by law. Similarly, Acosta does not engage in profiling in furtherance of decisions that produce legal or similarly significant effects. Acosta does not engage in “targeted advertising” as that term is defined in the Virginia Consumer Data Protection Act (“VCDPA”).

Acosta collects various categories of personal data when you use the Services, including identifiers, commercial information, internet or other electronic network or device activity information, geolocation data, and professional information. A more detailed description of the information Acosta collects and how we use it is provided above in Section 2 (Information We Collect). Section 5 (How We Share Your Information) describes the categories of third-parties with whom we share personal data, and what information may be shared under different circumstances. If you are a resident of Virginia, starting January 1, 2023 you have the right to (1) request to know what personal data has been collected about you and to access that information; (2) request to correct inaccuracies in your personal data; (3) request deletion of your personal data, though exceptions under the VCDPA and other laws may allow Acosta to retain and use certain personal data notwithstanding your deletion request; and (4) obtain a copy of your personal data. You can learn more about how to submit a data rights request, or appeal denial of a request, by emailing [privacy@acosta.com](mailto:privacy@acosta.com).

### **C. Colorado**

Colorado residents have certain rights around Acosta’s collection, use, and sharing of their personal data. Acosta does not sell your personal data and will not do so in the future without providing you with notice and an opportunity to opt-out of such sale as required by law. Similarly, Acosta does not engage in profiling in furtherance of decisions that produce legal or similarly significant effects. Acosta does not engage in “targeted advertising” as that term is defined in the Colorado Privacy Act (“CPA”).

Acosta collects various categories of personal data when you use the Services, including identifiers, commercial information, internet or other electronic network or device activity information, geolocation data, and professional information. A more detailed description of the information Acosta collects and how we use it is provided above in Section 2 (Information We Collect). Section 5 (How We Share Your Information) describes the categories of third-parties with whom we share personal data, and what information may be shared under different circumstances. If you are a resident of Colorado, starting July 1, 2023 you have the right to (1) request to know what personal data has been collected about you, and to access that information; (2) request to correct inaccuracies in your personal data; (3) request deletion of your personal data, though exceptions under the CPA and other laws may allow Acosta to retain and use certain personal data notwithstanding your deletion request; and (4) obtain a copy of your personal data. You can learn more about how to submit a data rights request, or appeal denial of a request, by emailing [privacy@acosta.com](mailto:privacy@acosta.com).

### **D. Connecticut**

Connecticut residents have certain rights around Acosta’s collection, use, and sharing of their personal data. Acosta does not sell your personal data. Similarly, Acosta does not engage in profiling in furtherance of decisions that produce legal or similarly significant effects. Acosta



does not engage in “targeted advertising” as that term is defined in the Connecticut Data Privacy Act (“CTDPA”).

Acosta collects various categories of personal data when you use the Services, including identifiers, commercial information, internet or other electronic network or device activity information, geolocation data, and professional information. A more detailed description of the information Acosta collects and how we use it is provided above in Section 2 (Information We Collect). Section 5 (How We Share Your Information) describes the categories of third-parties with whom we share personal data, and what information may be shared under different circumstances. If you are a resident of Connecticut, starting July 1, 2023 you have the right to (1) request to know what personal data has been collected about you, and to access that information; (2) request to correct inaccuracies in your personal data; (3) request deletion of your personal data, subject to exceptions; and (4) obtain a copy of your personal data. You can learn more about how to submit a data rights request, or appeal denial of a request, by emailing [privacy@acosta.com](mailto:privacy@acosta.com).

#### **E. EEA, Switzerland, or the UK**

If you are located in the EEA, Switzerland, or the UK, you are entitled to certain rights, subject to applicable exceptions, under the GDPR, Swiss, and UK data protection laws. Please note that, in order to verify your identity, we may require you to provide us with information prior to accessing any records containing information about you.

We typically will process your information pursuant to the following legal bases: (1) with your consent; (2) as necessary to perform our agreement to provide Services to you; or (3) as necessary for our legitimate interests in providing the Services where those interests do not override your fundamental rights and freedoms related to data privacy. We also may process your information where it is necessary to comply with a legal obligation to which we are subject.

- **Right of Access:** You have the right to obtain confirmation as to whether we are processing personal data about you, and if so, request a copy of the personal data. If you would like a copy of the personal data that we hold about you, please send a description of the personal data you would like a copy of and proof of your identity to our email as set forth below.
- **Right to Correction:** You have the right to correct any inaccuracies in the personal data that we hold about you and, where applicable, to complete any incomplete personal data that we hold.
- **Right to Erasure:** You have the right to request that we erase the personal data that we hold about you if one of the conditions in Article 17 of the GDPR applies. The right to erasure does not apply in certain circumstances, including where the processing is necessary for the establishment, exercise, or defense of legal claims.
- **Right to Restriction of Processing:** You have the right to restrict our processing of your personal data if one of the conditions in Article 18 of the GDPR applies.
- **Right to Data Portability:** You have the right to receive personal data concerning you in a structured, common, and machine-readable format or request transmission of the data to a third-party, if the conditions in Article 20 of the GDPR are met.



- Right to Object: You have the right to object to the processing of your personal data based on our legitimate interests at any time. We will no longer process the data, unless there are compelling legitimate grounds for our processing that override the interests, rights, and freedoms of the data subject, or the processing serves the purpose of asserting, exercising, or defending legal claims. You also have the right to object at any time to the use of your data for direct marketing.
- Right to Withdraw Consent: If we are processing your personal data based on your consent, you have the right to withdraw your consent at any time.

To submit a request to exercise your rights, please email us at [privacy@acosta.com](mailto:privacy@acosta.com) or call us at 1-800-377-2754. We may have a reason under the law why we do not have to comply with your request, or may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

#### Cross-border Transfer of Data

If you use our Services outside of the United States, you understand that we may collect, process, and store your personal data in the United States and other countries. The laws in the United States regarding personal data may be different from the laws of your state or country. Any such transfers will comply with safeguards as required by relevant law. By using the Services, you consent to the collection, international transfer, storage, and processing of your data.

#### Lodging a Complaint

Users that reside in the EEA, Switzerland, or the UK have the right to lodge a complaint about our data collection and processing actions with the supervisory authority concerned. Contact details for data protection authorities are available [here](#).

## **10. UPDATES TO THIS PRIVACY POLICY**

We may make changes to this Privacy Policy from time to time. The “Effective Date” at the top of this page indicates when this Privacy Policy was last revised. We may also notify you in other ways from time to time about the collection, use, and disclosure of your personal data described in this Privacy Policy.

## **11. CONTACT INFORMATION**

You may contact us via email at [privacy@acosta.com](mailto:privacy@acosta.com) or write to us at the following address:

Acosta Inc.  
Attn: Data Privacy Officer  
6600 Corporate Center Parkway  
Jacksonville, Florida 32216