



LIGHTNING DIVERSION SYSTEMS

Privacy Policy and Information Notice

Thank you for visiting Lightning Diversion Systems' website ("Site"). Lightning Diversion Systems ("LDS", "we", "us", "our") are committed to treating the personal and corporate information of our Site users, customers and vendors with respect and sensitivity. This Privacy Policy describes the types of information we collect on the Site, how we use the information, whether we share the information with anyone else and if so with whom, and the rights of users of the Site regarding our use of the information, including how users may contact us about our privacy policy.

As our services evolve and we perceive the need or desirability of using your Personal Data collected in other ways, we may from time to time amend this Privacy Policy. The effective date appears at the end of this Privacy Policy. We encourage you to check our Site frequently to review the current Privacy Policy in effect and any changes that may have been made to it.

By providing your Personal Data to us in any format (e.g., via email, telephone, fax, or in person) and/or continuing to use any of our services or visiting our Site you accept and consent to the practices described in this Privacy Policy and Information Notice .

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1. Definitions

The following definitions apply to this Privacy Policy:

“Controller” means the Company which is the organization that determines the purposes for which, and the manner in which, any Personal Data is Processed and used in its business.

“Processor” means any Person Processing Personal Data.

“Data Subject” means all living individuals about whom the Company holds Personal Data.

“Electronic” means relating to technology having electrical, digital, magnetic, wireless, optical, electromagnetic, or similar capabilities.

“Person” means a natural person, corporation, association, organization, partnership, or other legal entity.

“Personal Data” means information (whether stored Electronically or in paper based filing systems) relating to a living individual who can be identified from that data (or from that data and other information in our possession). Personal Data can be factual (such as a name, address, date of birth, social security number or driver's license number), sensitive (such as financial account information, protected health or medical details or information about a living individual's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition or sexual life, or about the commission of, or proceedings for, any offence committed or alleged to have been committed by that living individual, the disposal of such proceedings or the sentence of any court in such proceedings) or it can be an opinion (such as a performance appraisal). It can even include a simple e-mail address. It is important that the information has the Data Subject as its focus and affects the living individual's privacy in some way.

“Processing” is any activity that involves use of the Personal Data. It includes, without limitation, obtaining, recording or holding the Personal Data, or carrying out any operation or set of operations on the Personal Data including organizing, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring Personal Data to third parties.

2. What Personal Data does the company collect?

You can visit our Site without telling us who you are or revealing any Personal Data. But in some circumstances we may request, and you may submit Personal Data, which may include:

2.1 Information you give us

When you contact us through our Site, or by corresponding with us by phone, e-mail, or otherwise, we may collect Personal Data including:

- contact information, such as your name, postal address, telephone number, and email address;
- employment information, such as title, division, and current employer;

- financial information, such credit card and account information;
- for job applicants, additional personal information such as a resumé or C.V., salary history, education history, security clearance history and status, citizenship information, and position sought, as applicable;
- for current or prospective suppliers and subcontractors, personal information such as social security number, diversity-related information (e.g., ethnicity), country of citizenship, and federal tax ID number;
- any other personal information found in content provided by Site visitors, job applicants, prospective, current, and former suppliers and subcontractors, or prospective, current, and former customers.

When considering an individual for employment, additional Personal Data may be collected, as set forth in our Employee Privacy Policy.

2.2 Information we collect about you

When you visit our Site, our web server automatically collects the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), pages on our Site you viewed; page response times, download errors, duration of page visits, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page and any phone number used to call our customer service number.

2.3 Information we receive from other sources

This is information we receive about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that data if we intend to share those data internally and combine it with data collected on this Site. We will also have told you for what purpose we will share and combine your data. We are working closely with third parties including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers and search information providers. We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

2.4 Cookies

A cookie is a text file that our Site transfers to your computer's hard drive for record-keeping purposes and to enhance the quality of your visit to our Site. We use cookies

to personalize our Site for you and to collect aggregate information about the Site usage by all of our users.

Cookies enable us to identify your device. We use cookies that are strictly necessary to enable you to move around the site or to provide certain basic features. We use cookies to enhance the functionality of the website by storing your preferences, for example. We also use cookies to help us to improve the performance of our website to provide you with a better user experience. By using this Site and/or accepting cookies (e.g., where you are notified that they are intended to be used and you accept their use), they will be placed to maximize your experience and to help us understand how we can improve our Site.

Like many websites, we do not currently respond to “do not track” browser headers. But with most internet browsers, you can take steps to limit the use of cookies. If you do not want us to use cookies in your browser, you can remove cookies from your computer's hard drive, or set your browser to block cookies or to send a warning notice before a cookie is stored on your computer. However, please note that you may not be able to use many of the services on our website or other websites without cookies.

The cookies we may use on this Site are:

Cookies	Purpose
Google Analytics	This third party cookie is used to collect information about how visitors use the Site. We use this information to compile reports and to help us improve the Site. The cookies collect information in an anonymous form, including the number of visitors to the Site, where visitors have come to the Site from and the pages they visited. To opt out of being tracked by Google Analytics across all websites visit http://tools.google.com/dlpage/gaoptout .

More detailed information on cookies can be found at www.allaboutcookies.org.

3. **The legal basis for processing your Personal Data**

In order to comply with applicable data privacy laws, including the European Union’s General Data Privacy Regulation (“GDPR”), we are required to set out the legal basis for the processing of your Personal Data. In accordance with the purposes for which we collect and use your Personal Data, as set out above, the legal basis for processing your Personal Data will typically be one of the following:

- our own legitimate business interests, or the legitimate business interests of our third party partners and vendors, such as, for example, providing opportunities for customers to request a quote purchase of our products or services, offering marketing materials, maintaining and promoting our business by providing customers with feedback opportunities, permitting prospective employees to search and apply for job opportunities, handling inquiries from our distributors, vendors, and customers, or other

instances where we have carried out a legitimate interests assessment and have established an existing legitimate interest;

- the performance of a contract that we have in place with you;
- your consent where appropriate; or
- compliance with our legal obligations.

4. **How does the company use Personal Data?**

We use information held about you in the following ways:

4.1 **Information you give to us.** We will use this information:

- To provide you with the information, products, and services that you request from us;
- To send you direct marketing and promotional materials, or other communications;
- To respond to requests for information, services, or email notifications, or to respond to other enquiries;
- For training purposes, quality assurance, and to record details about the products and services you order from us;
- To comply with applicable laws and regulations;
- To carry out our obligations arising from any contracts entered into between you and us, or between you and our vendors or distributors;
- To provide you with information about other goods and services we offer, or that are offered by our affiliates or third party vendors, that are similar to those that you have already purchased or enquired about;
- To notify you about changes to our service;
- To make inquiries about you for credit reference purposes;
- To perform data analyses (including anonymization and aggregation of Personal Data);
- For prospective employees, to respond to your job application and process your CV.

4.2 **Information we collect about you.** We will use this information:

- To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical, and survey purposes;

- To improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- As part of our efforts to keep our site safe and secure.

4.3 **Information we receive from other sources.**

We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

5. **Do we share your Personal Data with any third parties?**

We do not sell or otherwise disclose your Personal Data with third parties, except as described in this Policy. We may share personal information with our affiliates and service providers who perform services on our behalf based on our instructions. You agree that we have the right to share your Personal Data with selected third parties, including:

- business partners, distributors, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- analytics and search engine providers that assist us in the improvement and optimization of our site.

We may disclose your personal information to third parties in the following circumstances:

- you request or authorize it;
- the information is provided to help complete a transaction for you;
- the information is provided to comply with the law, applicable regulations, court orders or subpoenas, to enforce our Terms of Use or other agreements, or to protect our rights, property, or safety or the rights, property, or safety of you or others;
- the disclosure is done as part of a purchase, transfer or sale of services or assets (e.g., in the event that substantially all of our assets are acquired by another party, personal information relating to customers, suppliers, and vendors may be one of the transferred assets);
- the information is provided to our agents, outside vendors, or service providers to perform functions on our behalf (e.g. analyzing data, providing marketing assistance, providing customer service, processing orders, etc.);
- we believe disclosure is necessary or appropriate to prevent harm or financial loss, or in connection with an investigation of suspected or actual espionage, cybersecurity events, or other fraudulent or illegal activity.

In such circumstances, only Lightning Diversion Systems, and its authorized affiliates, contractors, suppliers, or service providers will have access to your Personal Data. These third

parties are required to act in accordance with the instructions we give them and they must meet the requirements of the law. We ensure that they agree to put in place adequate measures to safeguard your Personal Data, and they will be required to use any Personal Data for only the intended purpose for which it was shared.

We may share your Personal Data with other companies so that they can contact you with details of other products or services you may be interested in. We will only do this if you have agreed to this and where such companies agree to use your personal information for that purpose only. You can ask us not to continue to provide your personal information to any third parties in future by contacting us at the address below.

6. Where we store your Personal Data

We may transfer the personal information about you to recipients in countries other than the country in which the information was originally collected. Those countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your information to recipients in other countries, we will protect that information as described in this Privacy Policy.

If you are located in the European Economic Area (“EEA”), we will comply with applicable legal requirements providing adequate protection for the transfer of personal information to countries outside of the EEA, such as United States. The data that we collect from you is stored on our servers and may be transferred within or outside the European Economic Area (“EEA”) to areas where privacy laws may be less strict than in the EEA. By submitting your personal information, you agree to this transfer and processing. We will take all reasonable steps necessary to ensure that your personal information is treated securely in accordance with this Privacy Policy and has the required adequate protection if it is processed or transferred outside the EEA.

7. How we protect your Personal Data

Lightning Diversion Systems uses reasonable and appropriate measures to protect your Personal Data from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into due account the risks involved in the processing undertaken and the nature of the Personal Data we collect. We maintain physical, administrative and technological safeguards to protect your Personal Data against accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure, or use.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your Personal Data, we cannot guarantee the security of your data transmitted to our Site via the Internet. Any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

8. How long we store your Personal Data

We will keep your Personal Data for as long as we need it, or as otherwise prescribed by law, for the purposes set out above. This period will vary depending on your interactions with us. We

may also keep a record of correspondence with you (for example if you have made a complaint about a product or service) for as long as is necessary to protect us from a legal claim. In some cases, there is a legal requirement to keep Personal Data for a minimum period of time. Unless this is the case, we do not keep your Personal Data for any longer than is necessary for the purposes for which the Personal Data was collected or for which it is to be further processed.

Please note that where you unsubscribe from our marketing communications, we will keep a record of your email address to ensure we do not send you marketing emails in future.

9. **Your rights with respect to your Personal Data**

If you provide us with personal information, you have the right to request that it be accessed, amended, corrected, or removed from our system by contacting us as indicated at the end of this Privacy Policy. We will try to deal with your request as promptly as possible. We reserve the right to charge a fee in dealing with any request pursuant to this section of the Policy, as permitted by applicable law.

If you are a resident of the EEA, you are accorded additional protections under the GDPR, with which we comply. Subject to certain exceptions, EEA residents have the following right with respect to their Personal Data:

- To receive a copy of the Personal Data that we hold about you;
- To request that any inaccurate or incomplete Personal Data be corrected or supplemented;
- To have your Personal Data erased, unless we have a legitimate reason to retain the Personal Data (such as if we are required to do so for legal reasons); and
- To ask us not to process your Personal Data for a particular purpose, including for marketing.

All of these rights are subject to certain conditions and exemptions. For example, we will not be obligated to erase your Personal Data if we need to retain it to protect ourselves in the event of a legal claim. To exercise any of these rights, please submit a written request to us using the contact information set forth at the end of this Policy.

10. **Access to your Personal Data**

To check that any information you have provided to the Company is accurate and up to date, to inform the Company of any changes, or to learn what information the Company holds about you, please submit a written request to the Company's Senior Director, Corporate Compliance at the address provided in the [Changes to the Privacy Policy and Contacting Us](#) section of this policy. The Company reserves the right to charge a fee in dealing with such a request as permitted by applicable law and regulations.

You have the right, at any time, to object to the use of your Personal Data for direct marketing purposes and/or the receipt or further receipt of specific or all types of marketing information,

or to object to the use of your Personal Data for any processing activity. To do so, you can direct your request by post to the address listed below or by e-mail.

11. Protecting children's privacy

Our Site is not designed nor intended to be used by children (those under the age of 18, "Minors"). We do not knowingly collect Personal Data from Minors. If you are under the age of 18, please do not submit any information to us.

12. Links to other websites

Our Site may include links to and from other websites of our partner networks and affiliates. If you follow a link to any of these websites, please note that these websites are not covered by this Privacy Policy. We are not responsible for the privacy practices of any third parties or the content of linked sites although we do encourage you to read the applicable privacy policies and terms and conditions of such parties or websites. This Privacy Policy only applies to how Lightning Diversion Systems deals with your Personal Data, and it does not apply to any other company or any other company's websites even if you access them via our Site. Please check these policies before you submit any Personal Data to these websites.

13. Changes to our privacy policy and contacting us

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our policy and notice.

This Site is owned and operated by Lightning Diversion Systems. If you have any questions or suggestions with respect to this Privacy Policy please write to us at

Lightning Diversion Systems Incorporated c/o Ducommun Incorporated

200 Sandpoint Avenue, Suite 700

Santa Ana, CA 92707-5759

or you can simply click on [Contact Us](#) to send us an email.

Effective Date: May 25, 2018