

Orion Aerospace & Defense Systems, Inc.
Policy
Website Privacy

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1. INTRODUCTION

This Privacy Policy provides important information about your privacy in connection with your use of Orion ADS websites and Internet based services and discloses our practices relating to the collection, retention, use and disclosure of personally identifiable information that you may provide through our websites/services or otherwise. Please review it carefully prior to use of our websites/service and/or submitting any Personally Identifiable Information (PII).

At Orion ADS your privacy is important to us. We are committed to protecting your individual privacy and complying with all applicable federal, state, local, and international privacy laws and regulations. We understand the importance of and strive to provide an environment in which our customers, suppliers, employees, prospective employees, partners and other visitors/users to/of our websites/services trust us to handle PII responsibly.

2. YOUR CONSENT

By using our websites/services, you agree with and accept the terms of this Privacy Policy. Whenever you submit personally identifiable information to/through these websites/services, you consent to the collection, disclosure, use and retention of that information in accordance with this Privacy Policy.

3. INTENDED AUDIENCE & CHILDREN'S PRIVACY

3.1. www.orionads.com

This website is primarily intended for business use by:

- Adult representatives of actual and potential customers interested in learning about Orion ADS or purchasing Orion ADS products and services
- Adult representatives of actual and potential suppliers interested in learning about Orion ADS or selling their products and services to Orion ADS
- Adult individuals interested in learning about career opportunities and applying for employment with Orion ADS.

This website is not intended to attract or be used:

- By consumers
- By children under the age of 13
- Otherwise for personal, household or family use

This website is not designed with the intent to attract the collection of PII from children under the age of 13. We ask that children under the age of 13 not submit any PII to us while viewing our website.

3.2. files.orionads.com and the Secure File Exchange Service

Access to this website and service requires registration, and is primarily intended for business use by:

- Adult representatives of Orion ADS
 - customers (and end customers)
 - suppliers
 - Employees

For the purpose of individual, organizational and project based secure digital file exchange and collaboration

This website and service is not intended to attract or be used:

- By consumers
- By children under the age of 18
- Otherwise for personal, household or family use

This website and service requires registration to access and children under the age of 18 are precluded from access by the registration process.

4. DATA COLLECTION

4.1. www.orionads.com

It is the policy of Orion ADS that this website content that requires minimal collection of PII from our visitors.

4.2. files.orionads.com and the Secure File Exchange Service (SFE)

It is the policy of Orion ADS that this website and service collect the PII of registered users required to ensure secure access to information to be shared using SFE by individuals authorized to access SFE information in accordance with all applicable laws, regulations and contractual agreements.

4.3. Data You Voluntarily Provide

To respond to your requests or to enable you to register or to use certain features of our websites and services, you may be required to provide PII by e-mail, web input screens and forms, and/or blogs, including, but not limited to, your name, company or organization affiliation, home address, email address and/or telephone number. In the case of Secure File Exchange you may also be requested to identify your citizenship and provide evidence thereof and to provide information required to verify you are a party to, or subject of, any required non-disclosure agreements to comply with export law and proprietary information agreements. In the case of our Employment section, applicants may also be requested to provide information typically found on resumes and employment applications. We do not collect any more PII than is reasonably necessary to enable us to process your transactions on our websites and services in accordance with the terms of use. The specific information requested will depend on the nature of the transaction to be completed and is always voluntary. However, failure to provide certain information may preclude your ability to access certain areas of our websites and services or preclude us from processing your transaction.

4.4. What Happens If I Register?

Orion ADS may use one or more websites as an entry points to other Orion ADS websites/web pages, portions thereof or network based services (such as Customer, Supplier, Employee, Employment Application and Secure File Exchange (SFE) areas) operated by Orion ADS, for which additional and/or unique terms of use and/or privacy policies may apply. These areas are typically subject to user registration and are password-protected, you understand that the privacy terms for such sites may differ through terms in separate agreements which may supplement or supersede these terms. You will be required to review and agree to those terms prior to accessing or using the services requiring registration. Registration data is collected by Orion ADS to monitor compliance with the terms governing the websites and services and to establish access permissions to certain pages and data on the websites and services.

4.5. Employment Data

Our websites may collect PII and Sensitive Personal Data (SPD) from prospective employees for human resources purposes. Orion ADS also collects personal information for human resources purposes from current, prospective and past employees through internal and external sources that may be unrelated to our websites and internet/network based services. All such information, regardless of the source, is collectively referred to in this Privacy Policy as "Employment Data."

4.6. Data Collected Automatically and Related Technical Considerations

Our websites and services uses modern web application methods that result in the automatic collection and storage of certain data that some may consider to be personal or personally identifiable information. This includes your Internet Protocol (IP) addresses and domain name, type of browser that you use, and other technical data about your computing environment. This information is stored in server logs that we maintain and review for the purpose of improving and supporting the secure operation of our websites and services.

4.6.1. IP Addresses

An IP address, is automatically assigned to your computer when you access the Internet, and is used by web servers to identify your computer. When you access our websites and/or services, we may log your IP address, however, your identity will remain anonymous to us, except when accessing websites and services that require registration to access in, which case your IP address may be associated with your PII collected during the registration process. We log the IP addresses for system administration and for auditing the use of our website. We may also use IP addresses to collect statistical information for marketing and other purposes.

4.6.2. Cookies

We may use "cookies" on our website to enhance the experience of our visitors, such as retaining user preferences between sessions. A cookie is a small text file that is stored on

your computer by a website server when you visit. Cookies are a way to identify a unique anonymous visitor and understand how they navigate our web site. Cookies are uniquely assigned to you, and our cookies can only be read by our web servers. An anonymous visitor to our site remains anonymous in all cases. Cookies cannot be used to deliver viruses to your computer.

We do not attempt to identify visitors if they do not voluntarily submit personal information to us, accessing registration controlled areas and services.

With most Internet browsers, you can erase cookies from your computer hard drive, modify your web browser settings to decline all cookies or selectively decline cookies as they are offered. However, if you decline to accept cookies, you may be unable to access certain parts of our website. Unless you have adjusted your browser setting to decline cookies, our system will issue cookies when you access the Website. Cookies offer enhanced functionality to the user, but whether you allow a cookie to be placed on your computer is up to you!

4.6.3. Tracking Scripts (Tracers)

In some instances, we may use tracking scripts or "tracers" that recognize a unique identifier from a cookie placed on your hard drive by another website. These are used by Orion ADS solely to gauge the success of our own advertising. For instance, we may use a tracer to determine whether you visit our employment pages after visiting a resume or career site where Orion ADS placed a banner ad. We do not use tracers to gather information on your use of the Internet unrelated to Orion ADS. Please note that Orion ADS does not use tracers to determine your PII, and you remain anonymous.

4.6.4. Web Beacons

Web beacons are small files that we may place on our websites, which count the number of unique users that have visited a specific page on the site and the number of times a given page has been displayed. This information is collected only in the aggregate and is generally not linked to any PII.

5. DATA USAGE

Your PII collected by our websites and services may be used by Orion ADS to:

- Allow you to participate in the registration-only features of our websites and services, and to download/upload relevant content, when you choose to do so
- Verify your identify to control/limit your access to relevant and/or permitted information (information may be subject to non-disclosure, export control, or other access restrictions)
- Ensure that content from our site is presented in the most effective manner for you, your computer, operating system and web browser;
- Customizing this our websites and services to your preferences
- Process requests from you
- Communicate information to you
- Marketing and research purposes

- Improving the content of our websites and services

We may combine such information with other passively or actively collected information unless we specify otherwise at the point of collection.

5.1. Registration Data Usage

We may use your voluntarily provided PII to:

- Verify your identity (in some cases, this may include background checks via third parties)
- Verify your affiliations (this may include confirmatory checks with third parties)
- Verify your eligibility to access certain data (this may include verification of citizenship, verification that you are party to, or subject of, required non-disclosure agreements, and checks with law enforcement or government agencies)

5.2. Employment Data Usage

Employment data collected may be used and disclosed by Orion ADS, for any purpose regarding your employment application or subsequent employment if hired, including:

- For pre-employment checks, which may include, but not be limited to, checking/verifying your citizenship, employment history, credit history, criminal records checks, address, academic qualifications and references
- Recruitment activities related to current (or future) vacancies
- For the purpose of making an offer and to manage your on-going employment with us
- Fulfill legal, contractual and compliance-related commitments, including subpoenas, garnishments, ethics investigations, disciplinary investigations, security investigations and compliance with lawful requests for information from government agencies
- To design, evaluate, implement and provide human resources programs and services to fulfill the employment agreement and otherwise administer employment arrangements, which include but are not limited to staffing, compensation and payroll, benefits, employee education, employee diversity, organizational development
- Support employee performance and development assessment programs
- Supply our external service providers and partners with information so that they can administer programs on our behalf, such as health and welfare, savings plans, pension plans, stock plans, performance incentives, stock awards, life insurance, employment verification, unions and bank direct deposits.
- Supply internal service providers, such as our legal, medical, security, corporate electronic directory and information systems management, among others, with information so they can manage their processes and programs.

Orion ADS will not use Employee Data for any other purposes and will not disclose it to any person except for these stated purposes, unless required or permitted by applicable laws.

5.3. Anonymous & Aggregate Data Usage

We may use IP addresses to identify a particular user if we believe it is needed to enforce compliance with these terms or to protect our company, employees, websites and services, customers or other parties.

Anonymous data collected using cookies and web beacons may be analyzed in the aggregate to determine collective user characteristics, to understand user traffic patterns, sales information and user behavior on the Site. Such information also may be shared in the aggregate with third parties for advertising purposes, to enhance our websites and services, to enhance our products and services, and to analyze how and where best to use our resources

6. SECURITY OF PERSONALLY IDENTIFIABLE INFORMATION

Orion ADS uses reasonable physical, electronic, and managerial procedures to safeguard and secure your PII against loss, unauthorized access, disclosure, copying, use or modification, whether or not in electronic format. We use industry-standard technological precautions, such as Secure Socket Layer (SSL) technology in an effort to protect your personal information as you transmit it electronically from your computer to our websites and services.

You should keep in mind that no combination of security measures can ever provide guaranteed protection all the time. We caution you that data transmission over the Internet is not 100% secure and any information disclosed online can potentially be collected and used other than by the intended recipient. e-mail may be particularly vulnerable to unauthorized interception, eavesdropping, modification and spoofing, and, therefore, you should take special care in deciding what information you send to us via e-mail. Moreover, where you use passwords, ID numbers or other special access features on this website, it is your responsibility to safeguard them. Orion ADS cannot warrant that your PII will not be disclosed to or accessed by parties other than those authorized under this Privacy Policy.

7. INFORMATION DISCLOSURE TO THIRD PARTIES

PII collected from you by Orion ADS will not be shared, rented, sold or traded with third parties for purposes other than in support of Orion ADS's operations and as necessary to facilitate the purpose for which you provided it.

We may disclose your PII to third parties under the following circumstances:

- With service providers retained by Orion ADS to provide services on our behalf. These providers will use your PII only to accomplish the task for which they have been retained. This may include, but not be limited to, third parties assisting us in processing a transaction requested by you (e.g., credit card service providers)
- If we are required to do so to comply with any legal obligation, by law enforcement authorities or government agencies, subpoenas, or court orders
- In connection with investigations or other efforts to prevent illegal activities or pertaining to public safety
- In order to enforce or apply our "Terms Of Use" and other agreements

- In order to protect the rights, property, or safety of Orion ADS and/or Orion ADS's systems, it's customers, or others
- In order to ensure the integrity and operation of Orion ADS and/or Orion ADS's business and systems
- We sell or buy any business or assets, in which case we may disclose your PII to the prospective seller or buyer of such business or assets
- Orion ADS or substantially all of its assets are acquired by a third party, in which case data held by it will be one of the transferred assets
- Certain employment data may be disclosed to third parties including, but not limited to:
 - Law enforcement and government agencies; credit services; and background investigators as required to process your application
 - Support subpoenas, garnishments, ethics investigations, disciplinary investigations, security investigations and to compliance with lawful requests for information from government agencies
 - Service providers and partners so that they can administer programs on our behalf, such as health and welfare, savings plans, pension plans, stock plans, performance incentives, stock awards, life insurance, employment verification, unions and bank direct deposits
 - Service providers, such as legal, medical, security, corporate electronic directory and information systems management, among others, with information so they can manage their processes and programs
 - Other pre and post employment human resources purposes allowed by law

8. ACCESS AND UPDATES TO YOUR PERSONAL DATA

To request a copy of and/or update/correct, your PII collected by Orion ADS via our websites and services please contact us as specified in "Contact Information" below. You will be required to provide reasonable proof of your identity when making such requests. Orion ADS will make reasonable efforts to update, change or delete any PII you have provided via our websites and services. In order to enforce the terms of this Privacy Policy, resolve disputes, or provide information to satisfy applicable governmental laws, regulations, investigations or proceedings, we may need to retain your PII in our files. Additionally, your PII may be retained in residual back-up files that are a function of our network's back-up systems.

9. INTERNATIONAL TRANSFER OF INFORMATION

If you are visiting our site from outside of the United States Of America, please be aware that PII that you input/submit on our site or data which is automatically collected will be transferred out of the country of origin to computers in the United States Of America. As such, you agree that your PII, in electronic and/or physical form, may be stored, transferred or accessed across national borders and entities as needed, subject to the other provisions of this policy.

10. EXTERNAL LINKS

This site may contain links or references to third-party web sites that are not affiliated with Orion ADS. The inclusion of any such link does not imply an endorsement of any other company, its web sites, or its products and/or services by Orion ADS. Any such linked web sites have separate and independent privacy policies which we encourage you to read carefully. Please be aware that Orion ADS does not operate and has no control over linked third-party web sites and, therefore, no responsibility or liability for the manner in which the organizations that operate such web sites may collect, disclose, use or otherwise treat your personal information.

11. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy periodically without prior notice. Updates will be dated and posted on our website. Please check back periodically and particularly before you submit any personal information.

12. CONTACT INFORMATION

If you have any questions or concerns regarding Orion ADS's privacy policy, please contact us at:

Privacy Officer
Orion Aerospace & Defense Systems, Inc.
500 Lomas Road
Jacksonville, OR 97530
privacy@orionads.com
(877) 214-7416

----- **END OF POLICY** -----