

PRIVACY STATEMENT

Wolverine Pipe Line Company (also referred to as “we,” “our,” “us”) has one goal: to transport liquid petroleum products safely and efficiently from refineries and terminals.

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1. What Information Do We Gather?

When you visit our Website and Portal (“Site”), we may gather the information necessary to identify your needs and to provide you with better service. Through your use of the site or registration as a new user, we may request personal information including, but not limited to:

- *Identifiers:* A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.
- *Personal Information:* A name, signature, physical characteristics or description, address, telephone number, insurance policy number, education, employment, employment history.
- *Commercial Information:* Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- *Internet Activity:* Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.
- *Professional or Employment Information:* Current or past job history
- Other information relevant to customer surveys and offers
- If you become a registered user or if you conduct transactions through this website, we will collect information about the transactions you engage in while on the website and your other activity on the site. This information may include, without limitation, areas of the website that you visit, transaction type, content that you view, download or submit, transaction amount, payment, and billing information as well as the nature, quantity and price of the goods or services you exchange and the individuals or entities with whom you communicate or transact business.

Some of this information, including name, company and contact information, will only be collected if you *voluntarily* provide it during the user registration process. We may also track information such as the domain name and the name of the web page from which you entered our Site, and how much time you spend on each of our pages. We collect information that is combined with other web visitors' information, such as how many times visitors click on each web page and the methods by which our Site was found. We may collect IP addresses and website usage information from you when you visit our Site via the use of "cookies." An IP address is a number that is assigned to your computer when you are using your browser on the Internet.

A cookie is a small file that is stored on the hard drive of your computer ready for future access when you return to our Site. We use cookies to deliver web content specific to you and to keep track of your online order activity. Cookies cannot pass viruses, harm your computer or pass on private information such as an email address without the computer user's intervention. Cookies contain session identification numbers that allow our systems to recall previous sessions for authentication efforts and assemble information from our gathered data. You can configure your computer's browser to alert you when a site is attempting to send you a cookie and allow you to accept or refuse the cookie. Further information on how to prevent cookies from being stored on your device can be found on <http://www.allaboutcookies.org> under the 'manage cookies' section. Alternatively, you can access further information by going to the help menu within your internet browser. To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

2. What Do We Do With the Personal Information We Collect?

You will be asked to provide personal information in certain fields on this Site that allow you to be able to use our Services. The personal information we collect is used only for the purpose we state at the time of collection or for purposes contained below. For example, our uses may include, but are not limited to, the following:

- **To process transactions.** Wolverine Pipe Line Company uses personal information such as name, physical address, telephone number, email address, and company/institution to engage in interactions with you, including contacting you about your transactions with the site.
- **To provide support or other services.** Wolverine Pipe Line Company may use your personal information to provide you with support or other services that you have ordered or requested. Wolverine Pipe Line Company may also use your personal information to respond directly to your requests for information, including registrations for newsletters, webinars, or other specific requests, or pass your contact information to the appropriate parties for further follow-up related to your interests.
- **To personalize services or provide information based on your needs and respond to your requests.** Wolverine Pipe Line Company may use your personal information to provide you with notices of new product releases and service developments.

- ***To select content, improve quality, and facilitate use of the websites.*** Wolverine Pipe Line Company may use your personal information, including the information gathered as a result of site navigation and electronic protocols and cookies (including third-party cookies), to help create and personalize website content, improve website quality, track marketing campaign responsiveness, evaluate page response rates, conduct usability testing, and facilitate your use of the websites (for example, to facilitate navigation and the login process, avoid duplicate data entry, enhance security, keep track of shopping cart additions, and preserve order information between sessions).
- ***To serve personalized advertising to you.*** We don't share your information with advertisers without your consent. We allow advertisers to choose the characteristics of users who will see their advertisements, and we may use any of the non-personally-identifiable attributes we have collected to select the appropriate audience for those advertisements. When you click on or otherwise interact with an advertisement, there is a possibility that the advertiser may place a cookie in your browser and that your attributes meet the criteria the advertiser selected.
- ***To assess usage of Wolverine Pipe Line Company products and services.*** Wolverine Pipe Line Company may track your usage of Wolverine Pipe Line Company products and services to determine your level of usage, and those usage statistics may be made available to Wolverine Pipe Line Company's content licensors and your company/institution.
- ***To communicate with you about events.*** We may communicate with you about events hosted or co-sponsored by Wolverine Pipe Line Company or one of our business associates. This may include information about the event's content, event logistics, payment, updates, and additional information related to the event. Information you provide when registering for or participating in a conference managed or co-sponsored by parties, other than or in addition to Wolverine Pipe Line Company may be shared with those parties, and the treatment of such information is further subject to the privacy policies of those parties. Wolverine Pipe Line Company and its conference co-sponsors may contact you after the event about the event, subsequent iterations of the event and related events. Please note that Wolverine Pipe Line Company event organizers, co-sponsors, exhibitors, and other third parties may directly request your personal information at their conference booths or presentations. Providing your information to them is optional, and you should review their privacy policies to address your particular needs and concerns about how they will treat your personal information.
- ***To update you on relevant Wolverine Pipe Line Company benefits, programs, and opportunities.*** Wolverine Pipe Line Company may communicate with you regarding relevant Wolverine Pipe Line Company benefits, programs, and opportunities available to you.
- ***To engage with third parties.*** Wolverine Pipe Line Company may share your personal data with third parties in connection with services that these individuals or entities perform for or with Wolverine Pipe Line Company. These third parties are restricted from using this data in any way other than to provide services for Wolverine Pipe Line Company or for the collaboration in which they and Wolverine

Pipe Line Company are contractually engaged (for example, hosting an Wolverine Pipe Line Company database or engaging in data processing on Wolverine Pipe Line Company's behalf, or mailing you information that you requested). These third parties are carefully selected by Wolverine Pipe Line Company and obligated to keep your data secure. From time to time, we may also share your information with third parties whom we think might provide content, products, or services of interest to you.

- **To protect Wolverine Pipe Line Company content and services.** We may use your information to prevent potentially illegal activities and to enforce our terms and conditions. We also use a variety of technological systems to detect and address anomalous activity and to screen content to prevent abuse, such as spam. These efforts may, on occasion, result in a temporary or permanent suspension or termination of some functions for some users. By using the Website, you acknowledge and agree that we may access, retain and disclose the information we collect and maintain about you if required to do so by law or in a good faith belief that such access, retention or disclosure is reasonably necessary to: (a) comply with legal process (e.g. a subpoena or court order) or law; (b) enforce our Terms of Use, this Privacy Statement, or other contracts with you, including investigation of potential violations thereof; (c) respond to claims that any content violates the rights of third parties; (d) respond to your requests for customer service; and/or (e) protect the rights, property or personal safety of Wolverine Pipe Line Company, its agents and affiliates, its users and/or the public. This includes exchanging information with other companies and organizations for fraud protection, compliance with applicable law, and spam/malware prevention, and similar purposes.
- **To get feedback or input from you.** In order to deliver products and services of most interest to our customers, from time to time, we may ask members, customers, volunteers, and website visitors to provide us input and feedback (for example through surveys, usability studies, focus groups).
- **To protect Wolverine Pipe Line Company information assets as well as your own personal data.** The Wolverine Pipe Line Company Information Security Program protects the confidentiality, integrity, and availability of Wolverine Pipe Line Company information assets by following a risk management approach based on policies, standards, guidelines, and procedures to meet security objectives while supporting business and operational goals.
- **To assist in Business Transfers.** As we continue to develop our business, we may buy, merge, or partner with other companies. In such transactions, (including in contemplation of such transactions) user information may be among the transferred assets. If a portion or all of Wolverine Pipe Line Company's assets are sold or transferred to a third-party, customer information (including your email address) would likely be one of the transferred business assets. If such transfer is subject to additional mandatory restrictions under applicable laws, Wolverine Pipe Line Company will comply with such restrictions.

To the extent that we collect certain demographic information about you, we may use this information in our market research, but we will do so only after we "anonymize" the data, i.e., remove information that would confirm your identity. We will not use your personally

identifiable information, however, to send commercial or marketing messages to you unless we have your continued consent for which you will have the ability to opt out by sending an email to rightofway@wplco.com.

This Site does not collect personally identifiable information when you browse the Site and request pages from our servers *unless* you voluntarily and knowingly provide such information to us. This means that we will not know your name, your email address, or any other personally identifiable information just because you browse the Site unless you:

- access the Site from a link in an email that we have sent to you;
- have created a profile and you either log-in to your account or choose to be remembered via your cookie or your web-enabled mobile device.

In these cases we will know who you are based on the information you previously supplied to us. When you request a page from our Site, our servers log the information provided in the HTTP request header including the IP number, the time of the request, the URL of your request and other information that is provided in the HTTP header. We collect the HTTP request header information in order to make our Site function correctly and provide you the functionality that you expect to see. We also use this information to personalize content presented to you, better understand how visitors use our Site and how we can better tune it, its contents, and functionality to meet your needs. We only use your personally identifiable information for those activities listed at the time you submit your information to us. For example, if you provide us with an email to inform you of special events, then that is what we will use your email address to do. If we would like to use your personally identifiable information for an unrelated activity, we will first request your consent to do so.

3. [Who Can Use the Information We Collect and How?](#)

We may provide your information to third parties, or third parties may collect information from you on our behalf if we have contracted with that third party to provide some part of the information or service that you have requested. Other than those who act on our behalf and except as explained in this Statement, information you provide at this Site will not be transferred to unrelated third parties, unless we have your permission to do so. However, please note that personal information provided to this Site is subject to disclosure pursuant to judicial or other government subpoenas, warrants or orders. We will only provide this information after approximately two weeks following receipt of a valid subpoena or other legal process in a civil case.

4. [How Do We Protect the Personal Information We Collect?](#)

Security of Personal Data

We are committed to protecting the security of your personal data. Depending on the circumstances, we may hold your information in hard copy and/or electronic form. For each medium, we use technologies and procedures to protect personal data. We review

our strategies and update as necessary to meet our business needs, changes in technology, and regulatory requirements. These measures include, but are not limited to, technical and organizational security policies and procedures, security controls and employee training.

Storage and Transfer of Personal Data

Personal data collected by Wolverine Pipe Line Company may be stored and processed in your region, in the United States or in any other country where Wolverine Pipe Line Company, its affiliates or contractors maintain facilities, including outside the European Union. We take steps to ensure that the data we collect under this Privacy Statement is processed pursuant to the terms thereof and the requirements of applicable law wherever the data is located.

Wolverine Pipe Line Company also collaborates with third parties such as cloud hosting services and suppliers located around the world to serve the needs of our business, workforce, and customers. In some cases, we may need to disclose or transfer your personal data within Wolverine Pipe Line Company or to third parties in areas outside of your home country. When we do so, we take steps to ensure that personal data is processed, secured, and transferred according to applicable law.

Disclosure and Sale of Personal Data

In the preceding twelve (12) months, Wolverine Pipe Line Company has not disclosed personal information for a business purpose. In the preceding twelve (12) months, Wolverine Pipe Line Company has not sold personal information.

Retention of Personal Data

Wolverine Pipe Line Company retains personal data for as long as necessary to provide the services and fulfill the transactions you have requested, or for other business purposes such as complying with our legal obligations, resolving disputes, and enforcing our agreements. We are required by law to keep some types of information for certain periods of time (e.g. statute of limitations). If your personal data is no longer necessary for the legal or business purposes for which it is processed, we will generally destroy or anonymize that information.

5. [What Are Your Rights Regarding Your Personal Data?](#)

We respect your right to access and control your personal data. You have choices about the data we collect. When you are asked to provide personal data that is not necessary for the purposes of providing you with our Sites, Products and Services, you may decline. However, if you choose not to provide data that is necessary to provide a Service, you may not have access to certain features, Sites, Products, or Services.

We aim to keep all personal data that we hold accurate, complete and up-to-date. While we will use our best efforts to do so, we encourage you to tell us if you change your contact details. If you believe that the information we hold about you is incorrect, incomplete or out-of-date, please contact rightofway@wplco.com.

6. How Do You Opt-out of Personal Information Sharing with Our Business Partners?

We may use third party analytics vendors to evaluate and provide us with information about the use of our Services and viewing of our content. Some of the information you see on our Sites may be customized based on automated predictions about your interests, which predictions are generated from your visits over time and across different websites, using tools such as Google Analytics. This information allows us to create content of greater interest to you and can also be used to serve ads based on your past visits to our Sites. Note that you can opt out of a third-party vendor's use of cookies, including use by Google, by visiting the Network Advertising Initiative opt-out page (<http://www.networkadvertising.org/choices/>).

For more information about how targeted Network Advertising works, please visit: <http://www.youradchoices.com/> or <http://www.networkadvertising.org/understanding-online-dvertising>.

You may opt-out of third party targeted advertising or analytics in two ways: 1) By directly notifying a Network Advertising service provider via its opt-out tools (Please see above) or 2) using your browser's Do Not Track (DNT) settings to indicate that you do not wish to receive targeted advertising based on your overall internet usage. For more information about DNT and how it works, please visit the Future of Privacy Forum's website: <http://www.allaboutdnt.com/>.

We will make a good faith reasonable effort to honor your DNT browser settings for opting out of receiving targeted third party advertising based on your overall Internet usage. Please note that various browsers frequently update technology or change their settings and business practices without advance notice, and we may not have the latest information on how to honor your preferences. If you exercise either opt-out option – the cookie opt-out or the browser opt-out – you will continue to receive advertising, but such advertising may not relate to your specific interests, previous purchases or search history.

However, you cannot opt-out of our contextual analytics and advertising, which is based on your usage of only our Services. We will continue to serve you contextual advertising. We will also continue to monitor your usage and search or transaction history to provide us with analytics on how well our Services, features and activities are functioning and used. We will also share this information in an aggregated form (meaning that no one individual person can be identified) within our company.

You can also opt out of our marketing emails at any time by contacting us at rightofway@wplco.com or by sending us a post card to “**OPT OUT**”, Wolverine Pipe Line Company, 8075 Creekside Drive, Suite 210, Portage, MI 49024.

7. How Do You Correct and Update Your Personal Information?

You can change or correct your account information at any time. Just send an email with your old information and your corrections to rightofway@wplco.com with "Correction" in the subject line.

8. What is Our Privacy Statement If You Are Under 13 Years of Age?

We understand the importance of protecting the privacy of all individuals, especially the very young. Our services are intended for United States audiences over the age of 18. We neither target nor sell our products to children under the age of 13, and we do not knowingly collect personal information from them. Subscribing to our online service is restricted to adults who are either 18 years of age or older or as otherwise legally defined.

9. What Happens When You Link to a Third-Party Web Site?

If you click on a link and go to another site, you will be subject to that website's privacy statement. If we conduct business with that website such that we need to exchange personally identifiable information, we will make sure that the business has a privacy statement just as protective as ours. We encourage you to read the posted privacy statement at any website **before** submitting any personal information at all.

10. What Happens When We Update Our Privacy Statement?

We may on occasion update our Statement. Your acceptance of any minor changes to this Statement is indicated by your continued use of our Services. If we make any material changes to our Statement, we will post a notice about the change at a prominent location on our Site. We encourage you to periodically review our Site and this Statement for any changes.

11. What Happens If We Sell Our Business?

While we do not anticipate it, every business nowadays should plan for the possibility that it might sell certain or all of its assets to another company or individual, or that it might buy certain assets of another company or individual. If all or part of the company is sold, merged or otherwise transferred to another entity, the personal information you have provided to us may be transferred as part of that transaction. However, we will take steps to ensure that your personal information is used in a manner consistent with the provisions of our Statement.

12. Your California Privacy Rights

The California Consumer Privacy Act of 2018 (CCPA) provides 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 COMPANY 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
- sales, identifying the personal information categories that each category of recipient purchased; and
- disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Request Rights

You have the right to request that Wolverine Pipe Line Company 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.
- Exercise free speech, 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 by either:

- Calling us at [269\) 323-2491](tel:2693232491)
- Visiting www.wolverinepipeline.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. Making a verifiable consumer request does not require you to create an account with us.

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, we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, 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.

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

If you are 16 years of age or older, you have the right to direct us to not sell your personal information at any time (the “right to opt-out”). 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.

To exercise the right to opt-out, you (or your authorized representative) may submit a request to us by visiting the following Internet Web page link:

www.wolverinepipeline.com/contact

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. You do not need to create an account with us to exercise your opt-out rights. We will only use personal information provided in an opt-out request to review and comply with the request.

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.

Other California Privacy Rights

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 send an email to rightofway@wplco.com

13. What If You Have Questions?

If you have questions or concerns regarding this statement, you should first contact us via email at rightofway@wplco.com