

PRIVACY POLICY

Last Updated: January 2025

Welcome to the Orton Oil Company website (hereafter referred to as “Website”, or www.ortonoilco.com). By accessing our website consent to the data practices described in this statement. Please read them carefully, should the user not acknowledge and agree to these terms, the user should not use our website.

Introduction

Orton Oil Company (“Orton’s”, “Orton Oil”, “we”, “us” or “our”) operates a chain of convenience stores throughout Minnesota and North Dakota. These terms govern the use of our website, including any content, features, or services provided through it.

Message to Our Customers Regarding Privacy

Orton Oil Company believes in protecting the confidentiality of our customers’ personal information in accordance with our customers’ wishes and applicable laws. Our reason for collecting customer information is to help us deliver added value and improve the shopping experience of our customers. Our method of collecting information helps us to target benefits and services to our customers. This may include advising our customers about products, services, and other purchasing opportunities.

Orton Oil Company values your business and the trust you place in us. To help you better understand how customers’ personal information is used and protected at Orton Oil Company, this Privacy Policy outlines (a) a definition of Personal Information, (b) methods and sources of collecting Personal Information, (c) categories of institutions or parties to whom we may disclose Personal Information, and (d) measures and efforts we take to safeguard Personal Information. Orton Oil Company reserves the right to revise this Privacy Policy at any time without prior notice. For this reason, please check regularly for the most recent version of our privacy policy and its implications for you.

Sharing Information with Third Parties

Please be advised that **ORTON OIL COMPANY DOES NOT SELL, RENT, OR LEASE ANY PERSONAL INFORMATION TO ANY THIRD PARTY.**

Orton Oil may transfer unique personally identifiable information (email, name, address, phone number) to a third party for the purpose of performing statistical analysis, sending you email or postal mail, providing customer support, or arrange for deliveries. All such third parties are prohibited from using your personal information except to provide these services to our company and are required to maintain the confidentiality of your personal information.

Orton Oil may disclose your personal information, without notice, if required to do so by law or in the good faith belief that such action is necessary to: (a) comply with legal process (b) protect or defend the rights or property of Orton Oil Co.; and/or (c) act under exigent circumstances to protect the personal safety of the users of Orton Oil, or the public.

Definition of Personal Information

Personal Information is information about you and/or your household, as well as your device (e.g., your name, birth date, address, email address, ISP, and mobile telephone number), that is obtained by Orton Oil Company in connection with providing a product or service for personal, family or household purposes.

Personal Information We Collect

We may collect:

- Name;
- Email;
- Address;
- Mobile phone number;
- Date of birth;
- Program Account number and password (“PIN”);
- Coarse location (for the limited purpose of providing business locations/services).
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How We Use Personal Information

We will collect and use your Personal Information, along with sales information or purchase data (Transaction Data) that is NOT Personal Information:

- to calculate available benefits and deliver appropriate offers and communications;
- to optimize your customer experience and enhance time spent at retail locations
- to fulfill the services, you have requested from us, such as receiving e-coupon or digital offers based on your purchases, and being eligible to participate in specific promotions and promotional events;
- where we have a legitimate interest, such as for research and anti-fraud protection;
- when required by law to do so, or to comply with and enforce legal requirements, agreements, and policies;
- as necessary for a corporate transaction (such as a merger or acquisition); in any such transfer of information, your personal information would remain subject to this Privacy Policy;

- for other purposes disclosed to you at the time you provide Personal Information to us.

Methods and Sources of collecting Personal Information

To help better understand and serve the needs of our customers, we collect Personal Information from various sources, including the following:

- Information you provide us when you enroll in the Orton's Rewards Program.
- Information submitted by you on our website.
- Information we receive when you use your Orton's Rewards card at retail locations that are participating in the Program.
- Information you give us on application forms, voluntary customer surveys, sweepstakes, and coupon rebate entries, or when you visit our website (Email Us page).
- Information you provide to us over the phone or through the mail or email.
- Information we collect through your browser when you visit our website and your browser interacts with us.
- Information provided to us by other sources/companies.

Orton Oil Company may share anonymous and/or aggregated information (free of any Personal Information) about all our users with third parties, either (1) where the User has

initiated the sharing; or (2) where the de-identified data is transferred to a service provider/vendor to process it on behalf of Orton Oil Company. All such third-party sharing has been approved in writing by Orton Oil. It is not possible for those third parties to determine who you are from such sanitized information.

What are your rights?

Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:

- Delete your personal information from our records; and
- Direct any service providers to delete your personal information from their records.

Please note that we may not be able to comply with requests to delete your personal information if it is necessary to:

- Complete the transaction for which personal information was collected.
- Detect security incidents, protect against malicious, deceptive, fraudulent or illegal activity; or prosecute those responsible for that activity.
- Exercise free speech, ensure the right of another consumer to exercise their free speech, or exercise another right.

You are entitled to know if we are using any automated decision-making tools.

You are entitled to know if we are using any biometrics as part of the identification of our consumers. We do not employ biometrics in the identification of our individual consumers.

Indemnification

You agree to indemnify and hold harmless Orton Oil, its affiliates, employees, and agents from and against any claims, liabilities, damages, losses, or expenses arising out of your use of the Website or breach of these Terms.

Limitation of Liability

To the fullest extent permitted by law, Orton Oil shall not be liable for any direct, indirect, incidental, special, or consequential damages arising out of your use of our Website, even if we have been advised of the possibility of such damages.

Collection of Personal Information from Children

We do not knowingly collect information from children under the age of 13. If you have reason to believe that we collected or are in possession of personal information from someone under 13 years of age, please contact us at 218-547-1719.

Exercising Your Rights

By contacting us as described in this section you can send us your requests related to your Personal Information. We may require that you verify your identity before exercising your individual rights. Please note that we are only required to respond to each person once per calendar year.

If you desire to make a request under your authority's application consumer data privacy law, please contact us by email: pricebook@ortonoil.com or call us at 218-547-1719. We will respond to such verified requests for information access within 45 calendar days following receipt at the email, unless we notify you that additional time will be required. Please note that we are only required to respond to each person once per calendar year per state under which a customer's request has been made.

Use of Cookies

The website may use "cookies" to help you personalize your online experience. Cookies are small data files stored on your hard drive by a website. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you. May

may use both session cookies (which expire when you close your browser) and persistent cookies (which stay on your computer until you delete them).

Will the Privacy Policy Change?

Orton Oil Company may modify this Privacy Policy from time to time. Our current Privacy Policy can be viewed on our website at www.ortonoilco.com. If you have any questions regarding this Privacy Policy or wish to change your personal Customer Information

preferences, please contact us at 218-547-1719 or via email at pricebook@ortonoil.com.

Contact Information

Orton Oil welcomes your questions or comments regarding this policy. If you believe the company has not adhered to this policy, please contact us here:

Orton Oil Company
6065 Oberly Loop NW
Walker, MN 56484

By Phone: 218-547-1719
Fax: 218-547-2309