

## PRIVACY POLICY

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Dansons Corp. dba Pit Boss Grills (“Dansons”, “we,” “us,” and “our”) appreciates having you visit our website and your interest in our products. We are committed to protecting your privacy and personal information that you provide to us when accessing or using our products, our services, or this website (this “Site”). This privacy policy (this “Policy”) explains how we gather and use the information that we collect during your visit to this Site.

This Policy may change over time, so please be sure to reread it from time to time. Amendments, modifications or changes to this Policy will be posted at this URL and will be effective when posted. Your continued use of this Site following the posting of any amendment, modifications or change to this Policy shall constitute your acceptance thereof. If you do not agree with the terms in this Policy, please do not use this Site and do not provide any information to us. Unless otherwise defined in this Policy, the terms used in this Policy have the meaning given to them in our Terms of Use, which you can access here: <https://uk.pitboss-grills.com/terms-and-conditions>.

### **1. RESTRICTIONS**

This Policy covers your access to this Site. Our Site is not directed to and is not intended for access and use by persons under the age of 18. We do not intentionally collect or use Personal Data from users that we have reason to believe are under the age of 18. California Civil Code Section 22581 permits minors under the age of 18 years, or their parents or guardians, to request and obtain removal of their information.

To request removal of your personal information please contact us using the methods described in this Policy. Note that removal under the law does not ensure complete or comprehensive removal of your information.

## **2. PERSONAL DATA COLLECTED**

The type of Personal Data (defined below) and Other Data (also defined below) we collect depends on how you interact with this Site. Generally, we gather Personal Data and Other Data as described below.

Personal data is information that identifies you or can be used to identify or contact you, e.g., your name, email address, address, usage data, phone numbers, and unique device identifiers (“Personal Data”). We may need to collect and process Personal Data in order to provide requested information, products or Services to you (including this Site) or because we are legally required to do so.

- Account Registration. We request Personal Data from you if this Site requires registration. The registration process requests that you provide your name, email address, address, phone number, company affiliation, if any, and other similar information. This information must be stored on this Site, and is accessible to anyone with whom you share your username and password. For this reason, please safeguard your username and password carefully and do not disclose it to any other person.
- Voluntary Disclosure. We may collect Personal Data voluntarily provided by you, including in emails to this Site, online forms, order and registration forms, surveys, promotion participation, phone calls and online chats with our customer service staff and through other means.
- Payment Services. We may use third-party payment Services (each, a “Payment Service”), such as Shopify, to collect payments made through this Site. If you wish to make a payment through this Site, you may be directed to a webpage that is hosted by the Payment Service (or the Payment Service’s service providers) and not by us. Any Personal Data that you provide through a Payment Service page will be collected by Payment Service and not by us, and will be subject to Payment Service’s privacy policy, rather than this Policy. We have no control over, and are not responsible for, Payment Service’s use of information collected through the Payment Service page.
- Log data. We may collect log data, such as network and connection information (including Internet Service Provider (ISP) and Internet Protocol (IP) addresses), device and browser identifiers and information (including device, application, or browser type, version, plug-in type and version, operating system, user agent, language and time zone settings, and other technical information), advertising identifiers, cookie identifiers and information, and similar data.
- Usage information. We may collect usage metrics (including usage rates, occurrences of technical errors, diagnostic reports, settings preferences, backup information), content interactions (including searches, views, downloads, and prints), and user journey history (including clickstreams and page navigation, URLs, timestamps, content viewed or searched for, page response times, page interaction, and similar data).

- Other Means. We may collect information through various other means, including from selected third-party business partners that we may utilize to deliver certain content, products, or services or to enhance your experience.

We ask that you not send us, and you not disclose, any sensitive Personal Data (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background, or trade union membership) on or through this Site or otherwise to us.

### **3. USE AND DISCLOSURE OF PERSONAL DATA**

Our primary goal in collecting, using, and sharing your information is to enhance and improve our Services. To that end, we will only use Personal Data for legitimate business purposes, including the following:

- Fulfillment of Requests. We may use Personal Data about you (a) to deliver products and services to you, (b) provide you with information about products and services you've ordered, (c) for internal research and development purposes, (d) when it is necessary for employees, agents and contractors to operate or maintain this Site or to correct a technical problem, (e) to detect and prevent fraud and abuse to ensure the security and protection of all customers and others, such as to verify the existence or condition of your account; (f) to comply with the law and our legal obligations, including to respond to a request or order from a court, regulator, or government authority; and (g) to effectuate the sale, merger, acquisition, or other disposition of our assets or business (including in connection with any bankruptcy or similar proceedings). We will engage in these activities to manage our contractual relationship with you and/or to comply with a legal obligation.
- Other Communications. From time to time, we may use Personal Data about you to inform you of products, programs, services and promotions that we believe may be of interest to you. If you or your employer is one of our customers, we may also inform you of such products, programs, services and promotions using Personal Data about you that you or your employer provided to us. If you would prefer that we not send electronic marketing messages to you, please see the "opt-out" section below.
- Promotions. We may operate sweepstakes, contests and similar promotions (collectively, "Promotions"). If you choose to enter the Promotions, we typically ask you for certain Personal Data when you enter and, if applicable, win a Promotion. You should carefully review the rules of each Promotion in which you participate, as they may contain additional important information about our use of Personal Data about you. To the extent that the terms and conditions of such rules concerning the treatment of your Personal Data conflict with this Policy, the terms and conditions of such rules shall control. We use this information to operate the Promotions.
- Other Business Purposes. We may also use Personal Data about you for other business purposes, such as data analysis (for example, to improve the efficiency of our Site), editorial and feedback purposes, providing customer support, customizing and improving the content and layout of this Site, completing business transactions (for example, to confirm content requested is received by users), development of marketing and promotion plans and materials, statistical analysis of user behavior (for example, to understand what parts of this

Site are of most interest to users), product development, market research, administering individual accounts, and meeting government regulatory requirements such as sales tax collection, audits, etc. We may also use Personal Data of journalist/media contacts for press release distribution or sharing other newsworthy developments related to our business activities. We engage in these activities to manage our contractual relationship with you, to comply with a legal obligation, and/or because we have a legitimate interest.

- Administrative Communications. We reserve the right to use Personal Data to send to you important information regarding this Site, products, services, your account status, changes to this Site's terms of use, this Policy, or any other policies, agreements or transactions relevant to your use of this Site, products and/or services. Because this information may be important to your use of this Site, products and/or services, you may not opt-out of receiving such communications. We will engage in this activity to manage our contractual relationship with you and/or to comply with a legal obligation.

We may disclose Personal Data for the following purposes:

- Third-Party Service Providers. We may provide Personal Data to third-party service providers, who provide services to us, including but not limited to, data analysis, order fulfillment, payment processing, and other services.
- Affiliate Communications. We may transfer Personal Data among our affiliates to allow our affiliates to contact you regarding products, programs, services and promotions that they believe may be of interest to you, and such affiliates may otherwise use your Personal Data in accordance with this Policy. If you would prefer not to receive marketing communications from us or our affiliates, please see the "opt-out" section below. We will be the party responsible for jointly-used Personal Data.
- Strategic Partners and Co-Branded Sites. From time to time, we may enter into a special relationship with another company that is not owned by or affiliated with us to provide or promote joint products, services, applications, or features (together, "Jointly Offered Items"). These special relationships may include co-branded web sites ("co-branded pages"). Any information, including Personal Data that you provide in connection with one of these Jointly Offered Items, and/or on one of these co-branded pages will be shared with our third-party partners. You should check these third parties' web sites for information regarding their privacy practices. PLEASE NOTE THAT THIS POLICY DOES NOT ADDRESS THE PRIVACY OR INFORMATION PRACTICES OF ANY THIRD PARTIES. If you do not want Personal Data about you shared with such third parties, please do not provide Personal Data in connection with the Jointly Offered Items and/or co-branded pages.
- Conferences and Events. When you attend a conference or event organized by us, your name and contact information may be shared with other attendees.
- Promotions. We may share the Personal Data you provide in connection with Promotions with third-party sponsors of such Promotions (irrespective of whether such Promotions are hosted by us), or otherwise in accordance with the rules applicable to those Promotions.

- Assignment. We may disclose or transfer any and all Personal Data that we collect to an affiliated entity or a third party (and their respective advisors) in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including without limitation in connection with any bankruptcy or similar proceedings).
- Law Enforcement; Emergencies; Compliance. We may use and disclose Personal Data about you to others as we believe to be appropriate: (a) in compliance with laws, rules, or regulations in any country in which we operates, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from government or public authorities, including government and public authorities outside your country of residence; (d) to enforce our Site’s terms of use; (e) to protect our operations or those of any affiliated entities; (f) to protect the rights, privacy, safety or property of us, our affiliated entities, you, or others; and (g) to permit us to pursue available remedies or limit the damages that we may sustain. For example, we may, to the fullest extent the law allows, disclose Personal Data about you to law enforcement agencies to assist them in identifying individuals who have been or may be engaged in unlawful activities.

#### 4. COLLECTION AND USE OF OTHER DATA

Our service providers and we may also collect and use the following types of data, referred to in this Policy as “Other Data”:

- Monitoring Data. Our service providers and we may collect and/or track other information such as demographic information, domain names, computer type, browser types, screen resolution, and other statistical data involving the use of this Site (“Monitoring Data”). We use Monitoring Data to help us understand who uses this Site and to improve and market it, as well as our other websites and services. Unless combined with Personal Data, Monitoring Data does not personally identify you or any other user, and we may use it for any purpose.
- Aggregated Data. We may aggregate Personal Data in a manner such that the end-product does not personally identify you or any other user of this Site, for example, by using information to calculate the percentage of our users who have a particular telephone area code. Such aggregate information may also be used for any purpose.
- Cookies. To enhance the Internet experience on this Site, our service providers and we may use ‘cookies’ on this Site. Cookies are data that a web server transfers to an individual’s computer for recordkeeping and other purposes. We use cookies and other technologies to facilitate users’ ongoing access to and use of our Site. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to automatically decline cookies, or to be given the choice of declining or accepting the transfer of a particular cookie, or cookies from a particular web site, to your computer. If cookies are disabled, however, all features of this Site may not operate as intended. Information about disabling cookies can be found on your Internet browser provider’s web site. This Site may have a Cookie Policy that applies to its use of cookies and other similar tracking technologies. If it does, then the Cookie Policy will apply in addition to this Policy. We may use the following types of cookies:

- Strictly Necessary. These include cookies that are required to allow registered users to authenticate and perform account related functions, as well as to save the contents of virtual “carts” for e-commerce functionality.
- Analytics and Performance. Performance cookies collect information on how users interact with our Site, including what pages are visited most, as well as other analytical data. We use these details to improve how our Site functions and to understand how users interact with our Sites.
- Functionality. These cookies are used to store preferences set by users, such as account name and language.
- Security. We use these cookies to help identify and prevent potential security risks.
- Advertising. These cookies are used to display relevant advertising to users who use our Site, as well as to understand and report on the efficacy of ads served on our Site. They track details such as the number of unique visitors, the number of times particular ads have been displayed, and the number of clicks the ads have received. They are also used to build user profiles, including showing you ads based on products you’ve viewed or acts you have taken.
- Third-Party / Embedded Content. Our Site may utilize third-party applications and services to enhance the experience of use of our Site. As a result, cookies may be set by third parties, and used by them to track your online activity. We have no direct control over the information that is collected by these cookies.
- Tools. Our service providers and we may also use various common Internet tools such as ‘pixel tags,’ ‘action tags,’ ‘web beacons,’ ‘gif tags,’ ‘JavaScript’ or similar technologies (together, “Tools”) in connection with Site pages and email messages in certain formats to, among other things, track the actions of Site users and email recipients, to determine the success of marketing campaigns and to compile statistics about Site usage and response rates. Tools allow us to count users who have visited certain pages of this Site, and to help determine the effectiveness of promotional or advertising campaigns. When used in email messages in certain formats, Tools can tell the sender whether and when the email has been opened.

We uses cookies and Tools to understand how this Site is used and to customize and enhance the Internet experience of individual users. When you revisit this Site, we may recognize you by a Tool and customize your experience. For example, once you have completed the registration process, a cookie and/or Tool will be used to avoid having you register again. We believe cookies and Tools add value to the user experience.

- HubSpot Analytics, Google Analytics. We may use Google Analytics, HubSpot Analytics and other similar programs which each use cookies and other similar technologies, to collect and analyze information about Site use and to report on activities and trends. These programs may also collect information regarding the use of other websites, apps and online resources.

- Verification. We may use third-party services to verify that you are a human user. Any information collected as part of such verification is subject to the privacy policy of the third-party service provider.
- IP Addresses. When you visit and interact with this Site, we and our third-party service providers may collect Internet Protocol (IP) addresses. Your IP address is a number that is automatically assigned to the computer that you are using by your Internet Service Provider (ISP). This number is identified and logged automatically in our server log files whenever you visit this Site, along with the time(s) of your visit(s) and the page(s) that you visited. We use IP addresses to understand how this Site is used by our users, to improve this Site and to enhance user experience of this Site. We may also use your IP address to help diagnose problems with our server and to administer our Site. We may also derive your approximate location from your IP address.

## 5. OUR ADVERTISING

We may use third-party advertising companies to serve advertisements regarding products and Services that may be of interest to you when you access and use this Site, our apps and other websites or online services, based on information relating to your access to and use of this Site and other websites or online services on any of your devices, as well as on information received from third parties. To do so, these companies may place or recognize a unique cookie on your browser (including through the use of pixel tags). They may also use these technologies, along with information they collect about your online use, to recognize you across the devices you use, such as a mobile phone and a laptop.

## 6. SECURITY

We may store your Personal Data. This information is retained and used in accordance with existing laws, rules, regulations, and other policies.

While there is no such thing as “perfect security” on the Internet, we will take reasonable steps to ensure the safety of your Personal Data. Personal Data is stored on database and is not publicly accessible. To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we take reasonable precautions and have security measures in place to protect the loss, misuse and alteration of the information under our control. Although we attempt to ensure the integrity and security of our network and systems, we cannot guarantee that our security measures will prevent bad actors from illegally obtaining this information. We are not responsible for any breach of security protecting Personal Data or for the actions of any third parties that may obtain any Personal Data. You are prohibited from violating or attempting to violate security for or otherwise interfering with the operation of this Site. **We do not make, and expressly disclaim, any representation or warranty, express or implied, regarding the security or integrity of this Site and your Personal Data.**

If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please notify us of the problem immediately by contacting Customer Care in North America at 1-480-923-9630 or Europe at service-eu@dansons.com.

## 7. DATA INTEGRITY; RETENTION PERIOD

We will use Personal Data only in ways that are compatible with the purposes for which it was collected, authorized by this Policy, or authorized by you. We will take reasonable steps to ensure that Personal Data is relevant to its intended use, and is accurate, complete, and current (as provided by you). We depend on you to update or correct your Personal Data whenever necessary.

We will retain Personal Data about you for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law. The criteria used to determine our retention periods include: (i) the length of time we have an ongoing relationship with you; (ii) whether there is a legal obligation to which we are subject; and (iii) whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

## **8. CONSENT**

By visiting our Site, you expressly consent to the collection and use by us of Personal Data according to this Policy.

## **9. CHOICE; OPT-OUT**

We give you choices regarding our use and disclosure of your Personal Data for marketing purposes.

- If you no longer want to receive marketing-related emails from us on a going-forward basis, you may stop receiving these marketing-related emails by unsubscribing or contact Customer Care in North America at 1-480-923-9630 or Europe at [service-eu@dansons.com](mailto:service-eu@dansons.com).
- If you would prefer that we do not share your Personal Data on a going-forward basis with our affiliates or with unaffiliated third parties for their marketing purposes, you may cease this sharing by contacting Customer Care in North America at 1-480-923-9630 or Europe at [service-eu@dansons.com](mailto:service-eu@dansons.com).

We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you exercise the second option as described above, we will not be able to remove your Personal Data from the databases of our affiliates or unaffiliated third parties with which we have already shared your Personal Data (i.e., to which we have already provided your Personal Data as of the date that we implement your request). Further, please note that requesting us not to share your Personal Data with affiliates or unaffiliated third parties may result in you no longer receiving any marketing emails from us. Please also note that if you choose not to receive marketing-related messages from us, we may still send you important administrative messages, and you cannot elect to stop receiving such administrative messages.

You may also indicate your choices regarding marketing-related emails by contacting us via postal mail or telephone using our contact information below, or if you have a profile/account, by changing your preferences on the profile/account at any time.

## **10. CORRECT; UPDATE; ACCESSIBILITY; CONFLICTS**

If you would like to request to review, correct, update, suppress, delete or otherwise limit our use of your



Personal Data that has been previously provided to us, or if you would like to request to receive an electronic copy of your Personal Data for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law), you may make a request by contacting us by contacting Customer Care in North America at 1-480-923-9630 or Europe at [service-eu@dansons.com](mailto:service-eu@dansons.com). We will respond to your request consistent with applicable law. For your protection, we may only implement requests with respect to the Personal Data associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable and consistent with applicable law. Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting the change or deletion. There may also be residual information that will remain within our databases and other records, which will not be removed.

We are committed to ensuring this Policy is accessible to individuals with disabilities. If you wish to access this Policy in an alternative format, please contact us by contacting Customer Care in North America at 1-480-923-9630 or Europe at [service-eu@dansons.com](mailto:service-eu@dansons.com). Depending on the specific interactions you have with us, we may provide different or supplemental privacy statements that describe and govern how we use your personal information. When we do so, those different or supplemental privacy statements apply to those specific interactions you have with us.

## **11. LINKS**

This Site may contain links to other Internet web sites, including social media sites and third-party hosted collaboration tools. These linked sites are not under our control. We provide links only as a convenience, and we do not endorse or control, and are not responsible for, the privacy practices or the content of these linked sites. If you provide any Personal Data through any third-party web site, or choose to communicate with us using third-party collaboration tools or other social media platforms, your transaction will occur on that third party's web site (not this Site) and the Personal Data you provide will be collected by, and controlled by the privacy policy of, that third party. We recommend that you familiarize yourself with the privacy policies and practices of any such third parties. PLEASE NOTE THAT THIS POLICY DOES NOT ADDRESS THE PRIVACY OR INFORMATION PRACTICES OF ANY THIRD PARTIES, INCLUDING, WITHOUT LIMITATION, AFFILIATED ENTITIES THAT DO NOT POST OR LINK DIRECTLY TO THIS POLICY.

## **12. GOVERNING LAW AND ENFORCEMENT OF PRIVACY POLICY**

Use of this Site is governed by United States law and the laws of the State of Arizona. If you are accessing this Site or Services from a physical location outside of the United States with laws or regulations governing personal data collection, use, and disclosure that are different from United States laws, you agree that by accessing this Site, you are transferring your Personal Data and Other Data to the United States and you consent to the application of the laws of the United States and the State of Arizona with respect to use of this Site and Services and any dispute regarding this Site or this Policy. You further consent to the exclusive jurisdiction of, and agree that venue is proper in, the state and federal courts located in Maricopa County, Arizona; provided, however, that if the state and federal courts in Maricopa County, Arizona are found not to have exclusive jurisdiction, then you agree to settle all disputes arising out of or relating to this Site or this Policy by binding arbitration in Phoenix, Arizona in accordance with the International Arbitration Rules set by the International Centre for Dispute Resolution.

If any provision of this Policy is held by a court of competent jurisdiction to be illegal, unenforceable, or in conflict with any applicable law, the validity of the remaining portions or provisions shall remain in full force and effect.

### **13. DO NOT TRACK DISCLOSURES**

We do not respond to Do Not Track (“DNT”) signals at this time. Some third party sites may track your actions when you are browsing and accessing content. Various browsers offer a DNT option that sends a signal to third parties that you do not want to be tracked.

### **14. DATA CONTROLLER**

For the purposes of this Policy, you are the Data Controller of your Personal Data. “Data Controller” means a person who (either alone or jointly or in common with other persons) determined the purposes for which and the manner in which any Personal Data is, or will be, processed. We should be considered only as a processor on your behalf as to any Personal Data that is subject to the requirements of European Union’s Directive 95/46/EC. We may use the services of various third-party service providers in order to process your data more effectively.

### **15. CROSS BORDER TRANSFER OF PERSONAL DATA**

Your Personal Data may be stored and processed in any country where we have facilities or in which we engage service providers. If you are accessing this Site from outside the United States, you may be sending information, including Personal Data to the United States where our servers are located. That information may be transferred within the United States or back out of the United States to other countries outside your country of residence. These countries do not necessarily have data protection laws as comprehensive as those in your country. Information transferred to the United States or another country is subject to the laws of that country and may be disclosed or accessed in accordance with those laws. By transferring information or allowing information to be transferred to us, you consent to the transfer, processing and storage in countries outside your country of residence. In certain circumstances, courts, law enforcement agencies, regulatory agencies, or security authorities in those other countries may be entitled to access your Personal Data.

### **16. CONTACT US.**

If you have any questions about this Policy or the practices of this Site or if you would like to request that we disclose or you wish to exercise any rights granted to you by statute (such as those granted to you by the CCPA, GDPR, ePrivacy Directive, or other applicable statute), please complete this interactive form at [insert link here] or feel free to contact us at:

Dansons Corp.  
8877 N. Gainey Center Drive  
Scottsdale, AZ 85258  
Attn: Legal Compliance / Data Protection Officer  
TEL: 1-480-923-9630

## **17. EUROPEAN RESIDENTS: YOUR PRIVACY RIGHTS**

Residents of the European Economic Area (“EEA”) or European Union (“EU”) and the United Kingdom (“UK”) are afforded additional rights with respect to their Personal Information under the General Data Protection Regulation (“GDPR”). To learn more about your rights under these laws, please visit our “GDPR Privacy Policy” at [insert link here] or contact us pursuant to the “Contact Us” section of this Policy. In the case of any discrepancies between this Privacy Policy and your rights under the GDPR Policy, your rights under the GDPR Policy will govern.

## **18. CALIFORNIA RESIDENTS: YOUR PRIVACY RIGHTS**

California residents are afforded certain additional rights with respect to their Personal Information under the California Consumer Privacy Act or “CCPA” (California Civil Code Section 1798.100 et. seq.) and the “Shine the Light” Law (California Civil Code section 1798.83). To learn more about your rights under these laws, please visit our “California Privacy Policy” at [insert link to here] or contact us pursuant to the “Contact Us” section of this Policy. In the case of any discrepancies between this Privacy Policy and your rights under the California Privacy Policy, your rights under the California Privacy Policy will govern.

## **19. NEVADA RESIDENTS: YOUR PRIVACY RIGHTS**

Nevada Senate Bill No. 220 requires website operators to provide a way for Nevada consumers to opt out of the sale of certain information that the website operator may collect about them. We do not sell your Personal Information to third-parties as defined in Nevada law, 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. To make such a request or learn more about our compliance with Nevada law, please contact us using the methods described in the “Contact Us” section of this Policy. In the case of any discrepancies between this Privacy Policy and your rights under relevant Nevada statutes, your rights under the statutes will govern.

## **CALIFORNIA PRIVACY POLICY**

### **1. YOUR CALIFORNIA PRIVACY RIGHTS.**

This policy is a supplement to our general privacy policy (“[Privacy Policy](#)”) for those individuals covered by California laws. California residents are afforded certain additional rights with respect to their Personal Information under the California Consumer Privacy Act or “[CCPA](#)” (California Civil Code Section 1798.100 et. seq.) and the “[Shine the Light](#)” Law (California Civil Code section 1798.83). All defined terms in the Privacy Policy shall retain the same meaning as this page. As used herein, and any of its supplemental policies, “Personal Information” is any Personal Data and Other Data that identifies (or can be used to identify) you or which permits the physical or online contacting of you, such as your name, address, email address, and phone number.

### **2. CALIFORNIA CONSUMER PRIVACY ACT.**

California residents have the right to request (1) more information about the categories and specific pieces of Personal Information we have collected, sold, and disclosed for a business purpose in the last 12 months, (2) deletion of your Personal Information, and (3) that we stop selling your Personal Information. We will not discriminate against you if you exercise your rights under the CCPA.

### **3. COLLECTION AND USE, DISCLOSURE, AND SALE OF PERSONAL INFORMATION.**

Generally, in the preceding 12 months, we have collected and used, may have disclosed, and may have sold the following categories of Personal Information: identifiers, characteristics of protected classifications under California or U.S. law, commercial information, Internet or other electronic network activity information, geolocation data, professional or employment-related information, audio, electronic, visual, or similar information, inferences drawn about you, and other categories of Personal Information that relate to, describe or are reasonably capable of being associated with you.

For a list of the specific data that we collect, may disclose and sell, the sources from which we collect this Personal Information, and Personal Information we use for the business and commercial purposes, please visit our “[Privacy Disclosures Page](#)” at [insert link here].

### **4. CCPA OPT-OUT.**

California Civil Code Section 1798.120 permits users who are California residents to opt out of the sale of their Personal Information to third-parties. Please be assured that this does not mean that we have received money in exchange for your Personal Information. Instead, there are instances where we have shared information about you, collected through cookies, to provide you with personalized services. In abundance of caution, if this sharing is considered or in the future determined to be a “sale” pursuant to California law, or if you would like to exercise any other California privacy rights, requests can be made by either (1) calling our toll-free number at 1-XX-XXX-XXXX or (2) contacting us pursuant the “[Contact Us](#)” section of our general Privacy Policy at [insert link here].

### **5. SHINE THE LIGHT LAW.**

California Civil Code Section 1798.83 permits users who are California residents to request certain information regarding the disclosure of Personal Information to third-parties, including our information

sharing practices, including the names and addresses of those businesses with whom we have shared your Personal Information, for direct marketing purposes. To make such a request, please contact us pursuant to the “Contact Us” section of our general Privacy Policy at [insert link here].

## **6. ADDITIONAL NOTICES**

We may engage with you beyond your activity as a visitor at our Site. Where you and the Company have further association, you may have modified and additional rights under California law or as stated above. The Company will provide you notice and inform you of those changed circumstances prior to the collection of your personal information. For example, employees of the Company or individuals applying for scholarships may be provided with additional notices and information.

## GENERAL DATA PROTECTION REGULATION POLICY

This General Data Protection Regulation Policy ("GDPR Privacy Policy") is a supplement to our general privacy policy ("Privacy Policy") for those individuals covered by European law. This GDPR Privacy Policy may change over time, so please be sure to reread it from time to time. Amendments, modifications or changes to this GDPR Privacy Policy will be posted at this URL and will be effective when posted. Your continued use of this Site following the posting of any amendment, modifications or change to this GDPR Privacy Policy shall constitute your acceptance thereof. If you do not agree with the terms in this GDPR Privacy Policy, please do not use this Site and do not provide any information to us.

General Data Protection Regulation ("GDPR") permits users who are in the European Economic Area ("EEA") or European Union ("EU") and the United Kingdom ("UK") to request certain information regarding the control, disclosure, and use of their Personal Information. In summary, those rights include the right to: fair processing of information and transparency over how we use your Personal Information, requires us to provide you with information regarding the information that we have about you and how we use that information, requires us to correct any mistakes in your information which we hold, requires the erasure of Personal Information concerning you in certain situations, and your right to object at any time to the processing, use, and automation of your data. As used herein, and any of its supplemental policies, "Personal Information" is any Personal Data and Other Data that identifies (or can be used to identify) you or which permits the physical or online contacting of you, such as your name, address, email address, phone number, other contact details, and any information that you provide to us. All defined terms in the Privacy Policy shall retain the same meaning as this page.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office ("ICO") on individuals' rights under the GDPR. If you would like to exercise any of those rights, please contact us pursuant to the "Contact Us" section of our general Privacy Policy at [insert link here].

In our operations, we may collect or obtain certain information such as, but not limited to, your name, mailing address(es), e-mail address(es), phone number(s), gender, age, date of birth, social security number, occupation, education level, income, race, religion, political party affiliation, and other bibliographic information, payment and applicable financial account information, and information pertaining to your creditworthiness, assets, income, or liabilities, information about your use of the Site, products and services which you have purchased, obtained, or have researched or to which, by use of the Site, have otherwise indicated interest, your IP address, time zone setting, geolocation data, domain servers, types of (and unique device identifiers for) devices and computers accessing our Site, types of browsers, operating systems, and other data of a technical nature which relates to your use and access of the Site (collectively referred to as "Information").

### **1. HOW WE COLLECT INFORMATION UNDER THE GDPR.**

Consistent with the Privacy Policy, and subject with applicable law of the GDPR and the choices and controls available to you as set forth herein, we may collect your Information in any way we feel necessary to provide you with the best experience when using the Site or in our dealings with you, to protect your interests, communicate our interests, or generally become better informed about you as our valued customer. We sometimes obtain your Information from third parties, including family members, referral sources, or parties to a transaction in which you or your employer or family member is a party or is otherwise involved. Technical data is provided to us by service providers of technology, payment and

delivery services, website analytics providers, and consumer reporting companies. Additionally, we may collect information as described in the “Contact Us” section of our general Privacy Policy. For more detailed information on the information we collect, please visit our “Privacy Disclosures Page” at [insert link here].

## **2. WHY WE COLLECT YOUR INFORMATION**

We collect your Information because:

- You are a customer or a prospective customer of our company or you are a supplier or referral source
- You otherwise use our products or services
- You are an employee or otherwise work for a customer, prospective customer, supplier or prospective supplier of ours, or for someone who otherwise uses our products or services
- You are an employee or otherwise work for a party to a transaction in which our company is involved.
- You are related to a customer of ours, or
- You are someone (or work for someone) to whom we would like to advertise or market our products, services or events.

## **3. HOW WE USE INFORMATION UNDER THE GDPR.**

Generally, we have collected and used, may have disclosed, and may have sold the following categories of Personal Information: identifiers, commercial information, Internet or other electronic network activity information, geolocation data, professional or employment-related information, audio, electronic, visual, or similar information, inferences drawn about you, and other categories of Personal Information that relate to, describe or are reasonably capable of being associated with you.

For a list of the specific data that we collect, disclose, and sell, the sources from which we collect this Personal Information, and Personal Information we use for the business and commercial purposes, please visit our “Privacy Disclosures Page” at [insert link here].

## **4. TRANSFER YOUR INFORMATION OUT OF EUROPEAN ECONOMIC AREA.**

We may transfer your Personal Information to areas outside of the EEA. Such countries do not have the same data protections as the EEA and the UK. The European Commission has determined some territories or countries are inadequate to receive certain data. While we take efforts to restrict transfer to those countries, we may in some instances transfer such data because it is necessary for us or we have determined it is a compelling legitimate interest. Where we transfer your Personal Information to countries outside of the EEA, we will take steps to ensure that your Personal Information will continue to be protected. In those instances, we will implement appropriate safeguards for the transfer of Personal Information to our service providers in accordance with the applicable law, such as relying on our service providers’ Privacy Shield certification or implementing standard contractual clauses for data transfers. For a list of the data transferred, please visit our “Privacy Disclosures Page” at [insert link here].

## **5. AUTOMATED DECISION MAKING.**

We may subject you to a decision based solely on automated processing, including profiling, in a manner which produces legal effects or similarly significantly affects you, without your express consent. For a list of the purposes in which we make automated decision processing, please visit our “Privacy Disclosures Page” at [insert link here].

## **6. HOW TO COMPLAIN UNDER GDPR.**

The GDPR also gives you the right to lodge a complaint with a supervisory authority, in particular in the EU (or EEA) state where you work, normally live, or where any alleged infringement of data protection laws occurred. We invite you to raise your concerns with us first, so that we can try to resolve them.

## **7. GDPR RIGHTS.**

You have the right to access Personal Information we hold about you and to ask that your Personal Information be corrected or erased and to port your Personal Information. You may also have the right to object to, or request that we restrict, certain processing or to withdraw consent you have previously provided. If you have any requests regarding your Personal Information, have any inquiries regarding this Privacy Policy, or you would like to exercise your rights or receive any information about your rights, please contact us pursuant to the “Contact Us” section of our of our general Privacy Policy at [insert link here].



**PRIVACY DISCLOSURES PAGE**

**1. CALIFORNIA DISCLOSURES.**

This section explains your rights regarding your Personal Information that we collect, as set forth in the California Consumer Privacy Act or the (“CCPA”). All defined terms in the California Privacy Policy shall retain the same meaning as this page. The following chart summarizes our Personal Information collection, use, and sharing practices in the preceding 12 months since we last updated this Policy on July 1, 2021.

<b>Category of Information</b>	<b>Purpose of Collection</b>	<b>Vendors and other third-party entities with whom we share this information</b>
<b>Identifiers, such as, your name, address, email address, and username</b>	<p>To process your requests for products, services, or information, to communicate with you, to improve our services, to enforce our agreements, to enforce our Terms of Use, to register your account, for the administration and protection of our business, and to comply with applicable law, regulations, and legal and regulatory processes.</p> <p>If you opt-in to do so, we may use your name and email address for our marketing purposes and to help our business partners with their marketing.</p>	<p>Service providers who assist in providing services on our behalf.</p> <p>If you opt-in to do so, our business partners.</p>
<b>Personal Information categories listed in the California Customer Records Statute (Cal. Civ. Code § 1798.80(e))</b>	<p>To process your requests for products, services, or information, to communicate with you, to improve our services, to enforce our agreements, to enforce our Terms of Use, to register your account, for the administration and protection of our business, and to comply with applicable law, regulations, and legal and regulatory processes.</p> <p>If you opt-in to do so, we may use your name and email address for our marketing purposes and to help our business partners with their marketing.</p>	<p>Service providers who assist in providing services on our behalf.</p> <p>If you opt-in to do so, our business partners.</p>

<b>Protected Classification characteristics under California law, such as, your racial or ethnic origin, religion, or sexual orientation</b>	If you are in the U.S. ONLY and you opt-in to do so, to improve our services, better understand our customer base, meet our diversity and inclusion goals; and to help our business partners do the same.	Service providers who assist in providing services on our behalf. If you are in the U.S. ONLY and you opt-in to do so, our business partners.
<b>Commercial Information, records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies</b>	To fulfill your requests for products or services, to improve our services	Service providers who assist in providing services on our behalf.  If you opt-in to do so, our business partners.
<b>Internet or Electronic Network Activity Information, e.g., browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement, or questions and other messages you address to us directly through online forms or by email</b>	To process your requests for products, services, or information, to communicate with you, to improve our services, to enforce our agreements, to enforce our Terms of Use, to register your account, for the administration and protection of our business, and to comply with applicable law, regulations, and legal and regulatory processes.	Service providers who assist in providing services on our behalf.  If you opt-in to do so, our business partners.
<b>Other Identifiers and Internet Activity Information, e.g., IP address; similar information</b>	To process your requests for products, services, or information, to communicate with you, to improve our services, to enforce our agreements, to enforce our Terms of Use, to register your account, for the administration and protection of our business, and to comply with applicable law, regulations, and legal and regulatory processes.	Service providers who assist in providing services on our behalf.  If you opt-in to do so, our business partners.
<b>Inferences about personal preferences and attributes drawn from profiling</b>	To improve our services, to help us better understand our customer base and to help our business partners improve their offerings.	Service providers who assist in providing services on our behalf.  If you opt-in to do so, our business partners.

**2. EUROPEAN DISCLOSURES.**

This section explains your rights regarding your Personal Information that we collect, as set forth in the General Data Protection Regulation or the (“GDPR”). All defined terms in the GDPR Privacy Policy shall retain the same meaning as this page. The following chart summarizes our Personal Information collection, use, and sharing practices since we last updated this Policy on January, 2022.

Type of Data	Purpose	Lawful Basis
Data that indirectly identifies you such as your IP address, mobile device ID and location data. This data does not include anything that allows us to identify you by name or contact details.	Identify/recognize you and analyze how you, and other users, navigate the Site and apps and what type of content you're interested in, and to manage and improve our services and products by testing new features of our sites and apps. We do this by using cookies or similar technology as explained in our "Cookie Policy" section which can be found at [insert link here].	Legitimate Interest.
Data that indirectly identifies you such as your IP address, mobile device ID and location data. This data does not include anything that allows us to identify you by name or contact details.	Recognize you and analyze how you, and other users, interact with ads on our services and what type of ads you're interested in. We do this by using cookies or similar technology as explained in our "Cookie Policy."	Consent.
Data that indirectly identifies you (such as your IP address or mobile device ID and location data) and data that directly identifies you (such as your name, username, and email address and information you include in your user profile).	Communicate legal information to you.	Legitimate Interest.
Data that directly identifies you (such as your name, username, and email address) and data that indirectly identifies you (such as your IP address or mobile device ID and location data).	Analyze comments and feedback you have given us including comments, feedback and reviews you have posted on our Site in order to use the information to improve our services and content offerings, and to enforce our Terms of Use.	Legitimate Interest.
Data that directly identifies you such as your name, username, email address and location data.	Provide you with communications and services you've signed up, for such as our newsletters.	Creation or performance of a contract.
Data that directly identifies you (such as your name, username, and email address and other information included in your user profile).	Register you as a user of our Site and other products and services and administer your account.	Creation or performance of a contract.

Data that indirectly identifies you (such as your IP address or mobile device ID and location data) and data that directly identifies you (such as your name, username, and email address).	Publish content on our Site including articles, feedback, reviews, and user comments about our posts.	Creation or performance of a contract.
Data that directly identifies you including your name and address, email address, other contact details, financial and transactional data.	Fulfill orders for our products or services placed on our Site.	Creation or performance of a contract.
Data that directly identifies you including your name and address, email address, other contact details, financial and transactional data.	Collect money you owe us.	Legitimate interest.
Data that indirectly identifies you (such as your IP address or mobile device ID) or data that directly identifies you (such as your name, username, email address and location data).	Verify or obtain payments due to us when you buy something from a third party after clicking on an “affiliate” link in our content, measure the performance of affiliate links, analyze, and develop this part of our business.	Legitimate interest.
Data that indirectly identifies you (such as your IP address or mobile device ID and location data) or data that directly identifies you (such as your name, username, and email address).	Communicate our terms, notify you about changes to them and communicate with you about non-compliance.	Creation or performance of a contract.
Data that indirectly identifies you (such as your IP address or mobile device ID and location data) or data that directly identifies you (such as your name, username, and email address).	Communicate our Privacy Policy and notify you of changes to them.	Compliance with a legal obligation.
Data that directly identifies you such as your name, username, name, email address and location data.	Conduct surveys or undertake similar types of research so that we can improve and develop our business, our services.	Consent.
Data that directly identifies you such as your name, username, and email address.	Allow you to take part in a prize draw, sweepstake, or other competition or other promotional activity.	Creation or performance of a contract.
Data that indirectly identifies you (such as your IP address or mobile device ID and location data) and data that directly identifies you (such as your name, username, and email address).	Administration and protection of our business including troubleshooting, data analysis, testing, system maintenance, user support, reporting and hosting data, administration and IT services, network	Legitimate interest.

	security, fraud prevention, customer services and business reorganization, including exchanging information with third parties for fraud protection and spam/malware prevention.	
Data that directly identifies you such as your name and email address.	Send marketing communications to you if you subscribe to our newsletters or other products and services.	Consent.
Data that directly identifies you such as your name and email address.	Communicate with you about our products or services that you sign up to receive when you create an account and transactions that you conduct using our services, including published content you visit, content you submit for publication on our Site, and content posted by you on our Site (including your comments on content, feedback and reviews).	Creation or performance of a contract.
Data that indirectly identifies you (such as your IP address or mobile device ID and location data) and/or data that directly identifies you (such as your name, username, and email address).	<p>Comply with applicable laws, regulations, and legal and regulatory processes.</p> <p>To prevent misconduct, abuse and misuse particularly as regards to illegal activities and suspected fraud</p>	<p>Creation or performance of a contract.</p> <p>For compliance with legal obligations to which we are subject, such as US and EU governmental regulations, and to enforce or defend our legal rights</p>

## COOKIE POLICY

### **1. GENERALLY.**

This cookie policy provides you with information about how we use "cookies", or similar technologies, on our websites, applications, and other services to enable us to understand how you interact with our products, to improve your experience, and to allow you to use certain features. This notice also provides information about how third parties may use such technologies in association with the operation of our services. This policy is a supplement to our general Privacy Policy, which can be found at [insert link here]. All defined terms in the general Privacy Policy shall retain the same meaning as this page.

### **2. WHAT ARE COOKIES?**

Cookies are small text files that are sent to the terminal you use to access to the Internet (usually your browser) by the websites you visit. Cookies are stored in your computer to be recognized by those websites on your subsequent visits. Cookies cannot be used to retrieve other data from your hard disk, transmit computer viruses or identify and use e-mail addresses. Each cookie is unique to each browser and device you use to access our Website. Cookies can be installed by the operator of the website you are visiting ("First-Party Cookies") or by other websites ("Third-Party Cookies"). Cookies can be permanently stored in your device until they expire or until you delete them ("Permanent Cookies"), or they can be automatically eliminated when you abandon the website or when you close your browser ("Session Cookies"). Cookies are used for several purposes: to ensure the correct functioning of the Website and offer an improved and more efficient browsing experience. A "web beacon," also known as a tag, pixel tag, or clear GIF, is used to transmit information back to a web server. When we talk about "cookies" in this Policy, we mean not just cookies, but web beacons and similar technologies.

### **3. ESSENTIAL COOKIES.**

"Essential Cookies," are cookies are that are necessary to allow you to browse our Website and use its functions. Without them, services such shopping baskets and electronic invoicing would not be able to work. Essential cookies are often referred to as "strictly necessary cookies." Your prior consent is not necessary for the use of these cookies.

### **4. NON-ESSENTIAL COOKIES**

"Non-essential Cookies," are cookies that do not fall within the definition of essential cookies, such as cookies used to analyze your behavior on our website, personalize the website for you, or email content to you that you may be interested in. Without non-essential cookies, the Site will lack certain features that you may use. These cookies assist us to provide you a more enjoyable experience and help us tailor our content to your preferences.

#### **4.1. FUNCTIONAL**

“Functional Cookies” enable the Site to provide enhanced functionality and personalization. They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies then some or all of these services may not function properly. If you do not allow these cookies then some or all of these services may not function properly.

#### **4.2. ANALYTIC COOKIES**

“Performance Cookies”, are cookies that allow us to count visits and traffic sources so we can measure and improve the performance of our Site. They help us to know which pages are the most and least popular, and see how visitors move around the Site. All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies we will not know when you have visited our Site, and will not be able to monitor its performance.

#### **4.3. PROFILING COOKIES.**

Profiling cookies create user profiles and are used to send advertisements in line with the preferences shown by the user while browsing the web. These cookies belong either to us or to third parties which are accurately selected and checked and they are used to guarantee that the marketing messages received through the Site or other websites used by us for advertising purposes are in line with your preferences. Our advertising may offer targeted messages, based on previous visits to the Site, on the pages visited more frequently and on other information on the visitor. Your prior consent is necessary for the use of these cookies.

#### **5. COOKIE OPT-OUT.**

When first accessing any page of our Site, a banner containing a simplified policy statement is displayed. This banner could include an unmarked box or toggle that requires you to affirmatively “opt-in” to our use of non-necessary cookies. Additionally, you may change and manage your cookie preferences in the following manner:

You may give or withdraw your consent to the use of non-necessary cookies at this [insert link to opt-out here].

You may give or withdraw your consent through your browser’s settings. The following are some common browsers and the instructions on how the settings can be changed.

[Internet Explorer](#)

[Google Chrome](#)

[Mozilla Firefox](#)

[Opera](#)

[Apple Safari](#)

## 6. COOKIES USED ON OUR WEBSITE.

ESSENTIAL COOKIES		
Type	Purpose	Duration
First-Party	These cookies allow us to remember the choices you make to tailor this website and provide enhanced features and content to you. For example, these cookies can be used to remember your user name, language choice or country selection, they can also be used to remember changes you've made to text size, font and other parts of pages that you can customize.	Permanent
First-Party	These cookies are placed on your device when you use one of our special referral pages to create a link to refer our service to your friends. If you receive a referral to our service and click on the link sent to you, we will also place a cookie on your device so that we can understand how well our referral program is performing and provide you with any benefit that is available to you, through the program when you sign up to our service.	Session
First-Party	Other preferences may be stored in our cookies so you do not have to reset them every time you visit our services but are strictly necessary for us to keep. For example, if you decide that you wish to opt-out of cookies there will be a single cookie stored on your browser so our website recognizes your preference when you return to our Website.	Permanent
First-Party	Some of our cookies are essential to make our Services work. They enable you to move around this site and use its features. Without these cookies, services that are necessary for you to be able to use the site, such as load balancing or remembering items in your shopping basket, can't be provided.	Session

NON-ESSENTIAL COOKIES		
Type	Purpose	Duration
Analytics: Google Analytics	They are used to anonymously monitor how the visitor uses the Website for statistical purposes, allowing us to optimize	Permanent (10 minutes to 2 years)



	<p>how the Website works and offer a better browsing experience.</p> <p>For more information and to learn how to opt out, visit them at <a href="https://support.google.com/analytics/answer/6004245?hl=en">https://support.google.com/analytics/answer/6004245?hl=en</a>.</p>	
Profiling: Facebook	<p>They are used to select advertising messages in Facebook based on the visitor's preferences and interests, based on information collected when the visitor browses our Website. Prior consent is requested for the use of these cookies</p> <p>For more information and to learn how to opt out, visit them at <a href="https://www.facebook.com/help/164968693837950?helpref=faq_content">https://www.facebook.com/help/164968693837950?helpref=faq_content</a> for their privacy policy.</p>	90 days
Profiling: LinkedIn	<p>They are used to select advertising messages in LinkedIn based on the visitor's preferences and interests, based on information collected when the visitor browses our Website.</p> <p>For more information and to learn how to opt out, visit them at <a href="https://www.linkedin.com/legal/privacy-policy">https://www.linkedin.com/legal/privacy-policy</a> for their privacy policy.</p>	90 days