

Effective Date: January 1, 2020

SK Hand Tool, LLC, part of IDEAL INDUSTRIES, INC. (“**IDEAL**”) and its Family of Companies (collectively “we”, “us” or “our”, or each, “**Entity**”), respect your privacy and we are committed to protecting it through our compliance with this Privacy Policy. We have created this Privacy Policy to inform you of how we collect, process, store, transfer and delete your personal information, as well the rights you have in relation to that information.

This Privacy Policy applies to all personal information collected during any written, electronic, and oral communications or collected online or offline (collectively “Services”), which includes:

- our website located at www.ideal-industries.com, and all corresponding webpages and websites that link to this Privacy Policy (the “Site”);
- our mobile applications and any other apps that link to this Privacy Policy (e.g., Apple iOS Apps, etc);
- when you interact with our advertising and applications on third party websites and services, if the advertising and applications include links to this Privacy Policy
- subscriptions to our newsletters and other marketing messages;
- invitations to and participation in our events;
- recruitment processes; and
- customer/contractor and potential customer/contractor matters.

By using our Services, you consent to the collection and use of the personal information in accordance with this Privacy Policy and our Terms of Use. If you do not feel comfortable with any part of this Privacy Policy or our Terms of Use, you should not use or access our Site or use our Services.

We may modify this Privacy Policy at any time, without prior notice, and changes may apply to any personal information we already hold about you, as well as any new personal information collected after the Privacy Policy is modified. If we make changes, we will notify you by revising the effective date at the top of this Privacy Policy. If we make any material changes to how we collect, use or disclose your personal information that adversely impacts your rights under this Policy we will notify you in advance using any reasonable method, such as by email or through our Services. If you continue to access or use our Services after receiving the notice of changes, you acknowledge your acceptance of the updated Privacy Policy.

In addition, we may provide you with real time disclosures or additional information about the personal information handling practices of specific parts of our Services. Such notices may supplement this Privacy Policy or provide you with additional choices about how we process your personal information.

1. PERSONAL INFORMATION WE COLLECT AND HOW WE COLLECT IT

We collect personal information when you use our Services, create an account with us or submit personal information to us. Personal information means information relating to an identified or identifiable natural person such as your name, address, phone number or email address. The types of personal information that we may collect about you include, but are not limited to:

Information You Voluntarily Provide to Us on Our Services

The personal information we collect on or through our Site or services may include:

- information relating to the creation of an account on one of our websites or mobile applications, such as name, email address, postal address, telephone number and/or a unique individual password;
- information that you provide by filling in forms that we make available. This includes information provided at the time of creating an account on one of our websites or mobile applications, subscribing to or purchasing from our Site, posting material, or requesting information or assistance;
- your city, state and zip code for store locator purposes;
- information you provide when you report a problem with our Site or an online purchase or other transaction with us by email, our Site, telephone, in writing or through other means;
- voice recordings, and copies of your correspondence (including email addresses), if you contact us;
- information related to your participation in our programs;
- information relating to your participation in a contest, sweepstake, promotion, or surveys that we may ask you to complete for research purposes; or
- payment card, transaction or financial account information, if you make a purchase.

Providing personal information this way is completely voluntary. If any form which collects your personal information allows you to voluntarily provide additional information, we seek this information because we think it will help us to give you a better-quality service. You do not have to provide such information if you do not wish to do so.

Information Collected Automatically

As you navigate through and interact with our Site or Services, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions and patterns, including:

- Details of your visits to our Site, including, but not limited to, traffic data, location data, logs and other communication data and the resources that you access and use on the Site.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.
- Information about the type of device you are using, mobile ad identifiers, the time and length of your visit, the website that referred you to our website, and the subject of the ads you click or scroll over.
- Information about your preferences to make your use of the Site more productive, via the use of Cookies. For more information on Cookies, please see Section 2.

Information You Provide to Our Affiliates and Subsidiaries

We may receive personal information about you from a company controlled by or under common control with IDEAL. We also may collect information about your use of the Services, such as your browser information, pages clicked, and time spent navigating the site. This information cannot be used to identify you. If we link this information with any personal information, we will treat such linked information as personal information.

Information Collected from Other Sources

We receive information about you from other sources to help us correct or supplement our records, improve the quality or personalization of our service to you, and prevent or detect fraud.

- For instance, we may collect personal information about you from our business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, and credit reference.
- Some information we collect is publicly available. For example, we may collect information you submit to a blog, a chat room, or a social network like Facebook, Twitter or Google+. We may also collect information about you from other companies and organizations. By gathering additional information about you, we can correct inaccurate information, enhance the security of your transactions, and give you product recommendations and special offers that are more likely to interest you. We may use cameras, closed circuit television (CCTV) to keep employees and customers safe and to look for ways to improve our customer experience. We do not use these cameras to identify people except when necessary for security reasons.

2. COOKIES AND OTHER TRACKING TECHNOLOGIES

We may use cookies, embedded scripts, software development kits (“SDKs”) and other similar tracking technologies (collectively, “Tracking Technologies”) to collect additional personal information automatically as you interact with the Services and to personalize your experience with our Services.

Cookies

Cookies are small text files that are sent to or accessed from your web browser or your computer's hard drive. A cookie typically contains the name of the domain (internet location) from which the cookie originated, the “lifetime” of the cookie (i.e., when it expires) and a randomly generated unique number or similar identifier. A cookie also may contain information about your computer, such as user settings, browsing history and Internet activities. We use first-party and third-party cookies for the following purposes: to make our Services function properly, to improve our Site or services, to make login to our Site or services easier (such as by remembering your User ID), to recognize you when you return to our Site, to track your interaction with the Site or services, to enhance your experience with the Site or services, to remember information you have already provided, to collect information about your activities over time and across third party websites or other online services in order to deliver content and advertising tailored to your interests; and to provide a secure browsing experience during your use of our Site or services. The length of time a cookie will stay on your browsing device depends on whether it is a "persistent" or "session" cookie. Session cookies will only stay on your device until you stop browsing. Persistent cookies stay on your browsing device until they expire or are deleted (i.e. after you have finished browsing).

We may place cookies from third-party service providers who may use information about your visits to other websites to target advertisements for products and services available from us. We do not control the types of information collected and stored by these third-party cookies. You should check the third-party's website for more information on how they use cookies. We use the following types of cookies on our Services:

- *Strictly Necessary Cookies.* These cookies are essential because they enable you to use our Site. For example, strictly necessary cookies allow you to access secure areas on our Site. Without these cookies, some Site cannot be provided. These cookies do not gather information about you for marketing purposes. This category of cookies is essential for our Site to work and they cannot be disabled.

- *Functional or Preference Cookies.* We use functional cookies to remember your choices so we can tailor our Site to provide you with enhanced features and personalized content. For example, these cookies can be used to remember your name or preferences on our Site. We do not use functional cookies to target you with online marketing. While these cookies can be disabled, this may result in less functionality during your use of our Site.
- *Performance or Analytic Cookies.* These cookies collect passive information about how you use our Site, including webpages you visit and links you click. We use the information collected by such cookies to improve and optimize our Site. We do not use these cookies to target you with online marketing. You can disable these cookies.
- *Advertising or Targeting Cookies.* These cookies are used to make advertising messages more relevant to you. They perform functions like preventing the same ad from continuously reappearing, ensuring that ads are properly displayed for advertisers, and in some cases selecting advertisements that are based on your interests. Our third-party advertising partners may use these cookies to build a profile of your interests and deliver relevant advertising on other sites. You may disable the use of these cookies as set forth below.

Analytics

We may use third-party service providers to monitor and analyze the use of our Site. Presently, we use Google Analytics. Google Analytics is a web analytics service offered by Google LLC (“Google”) that tracks and reports Site traffic. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page:

<https://policies.google.com/privacy?hl=en>. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics, available at: <https://tools.google.com/dlpage/gaoptout>.

We also use Adobe Marketing Cloud solutions to collect and analyze information, such as clicks made by visitors on our websites, apps and social networking pages to enable us to understand our online resources and marketing campaigns. For more information about Adobe Marketing Cloud, please review the [Adobe Marketing Cloud Privacy Policy](#). IDEAL participates in the Adobe Marketing Cloud Device Co-op to better understand how you use our Online Services across the various devices you use, and to deliver tailored promotions. Go to <https://cross-device-privacy.adobe.com> to learn more about how Adobe does this and to manage your choices relating to this linking of devices.

Behavioral Remarketing

We also use remarketing services to advertise on third-party websites to you after you visited our Site or services. We and our third-party vendors use cookies to inform, optimize and serve ads based on your past visits to our Service. We use Google Ads for these purposes. Google Ads remarketing service is provided by Google. You can opt-out of this by visiting the Google Ads Settings page: <http://www.google.com/settings/ads>.

Other Tracking Technologies

We may also use Tracking Technologies to collect "clickstream" data, such as the domain name of the service providing you with Internet access, your device type, IP address used to connect your computer to the Internet, your browser type and version, operating system and platform, the average time spent on our Site, webpages viewed, content searched for, access times and

other relevant statistics, and assign unique identifiers to the device or other credentials you use to access the Site for the same purposes.

Pages of our Site and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

Pages of our Site may also use Java scripts, which are code snippets embedded in various parts of websites and applications that facilitate a variety of operations including accelerating the refresh speed of certain functionality or monitoring usage of various online components; entity tags, which are HTTP code mechanisms that allow portions of websites to be stored or “cached” within your browser to accelerate website performance; and HTML5 local storage, which allows data from websites to be stored or “cached” within your browser to store and retrieve data in HTML5 pages when the website is revisited.

Your Choices

Your browser may provide you with the option to refuse some or all browser cookies. You may also be able to remove cookies from your browser. You can exercise your preferences in relation to cookies served on our Site by taking the steps outlined below.

- *First-Party Cookies.* You can use the browser with which you are viewing this Site to enable, disable or delete cookies. To do this, follow the instructions provided by your browser (usually located within the “Help”, “Tools” or “Edit” settings). Please note, if you set your browser to disable cookies, you may not be able to access secure areas of the Site. Also, if you disable cookies other parts of the Services may not work properly. You can find more information about how to change your browser cookie settings at <http://www.allaboutcookies.org>.
- *Third-Party Cookies.* To opt-out of third-party advertising networks and similar entities that use advertising cookies go to <http://www.aboutads.info/choices>. Once you click the link you may choose to opt-out of such advertising from all participating advertising companies or only advertising provided by specific advertising entities. For more information about third-party advertising networks and similar entities that use these technologies, please see <http://www.aboutads.info/consumers>.
- *Targeted Advertising.* If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers’ target-audience preferences, you can opt-out of interest-based targeting provided by participating ad servers through the Digital Advertising Alliance (<http://optout.aboutads.info/>) or the Network Advertising Initiative (<http://optout.networkadvertising.org/?c=1>). In addition, on your iPhone, iPad or Android mobile device, you can change your device settings to control whether you see online interest-based ads.

We do not control third parties’ collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. In addition, most web browsers provide help pages relating to setting cookie preferences. More information may be found for the following browsers here:

- [Google Chrome](#)

- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Safari \(Desktop\)](#)
- [Safari \(Mobile\)](#)
- [Android Browser](#)
- [Opera](#)
- [Opera Mobile](#)

Do Not Track

Some Internet browsers, such as Internet Explorer, Firefox, and Safari, include the ability to transmit “Do Not Track” or “DNT” signals. Since uniform standards for “DNT” signals have not been adopted, our Site does not currently process or respond to “DNT” signals.

Location Information

If you do not want us to collect Location Information from your device, please delete our mobile application or disable your device’s location settings. Please note that disabling the location setting may affect certain features of the mobile application.

3. HOW WE USE YOUR INFORMATION

We will only use your personal information as described in this Privacy Policy or as disclosed to you prior to such processing taking place. The purposes for which we may use your personal information include:

a) To Provide You Our Services

We will use your personal information to provide information or perform Services that you request. If the applicable information is to be provided or Service is to be performed by a third party, then we will disclose the applicable information to the third party providing the information or performing applicable Services. Your information may be available or provided to third-party service providers and contractors (such as the Site webmaster) that are contractually obligated to protect your information as disclosed in this Policy.

b) For Internal Use

We will use your personal information for the purposes of furthering our business, including analyzing your information and other uses. We may monitor how our users use our Site including without limitation search terms entered, pages visited and documents viewed. This information may be stored with an IP address. This information is used solely for purposes of enabling us to provide you with a personalized Site experience. Aggregated forms of this data may also be used for research purposes in order to develop new products and identify future features and functions to develop for the Site.

c) To Provide You with Service-Related Communications

We will send you administrative or account-related information to keep you updated about your account and the Services. Such communications may include information about policy updates, confirmations of your account actions or transactions, security updates or tips or other relevant transaction-related information. We process your contact information to send you such communications. Service-related communications are not promotional in nature. You are not able to unsubscribe from such communications, otherwise you may miss important developments relating to your account or the Services.

d) To Provide Customer Support or Respond to You

We collect any information that you provide to us when you contact us, such as with questions, concerns, feedback, disputes or issues. Without your personal information, we cannot respond to you or ensure your continued use and enjoyment of the Services.

e) To Enforce Compliance with Our Terms and Agreements or Policies

When you access or use our Services, you are bound to our Terms and this Privacy Policy. To ensure you comply with them, we process your personal information by actively monitoring, investigating, preventing and mitigating any alleged or actual prohibited, illicit or illegal activities on our Services. We also process your personal information to: investigate, prevent or mitigate violations of our internal terms, agreements or policies; enforce our agreements with third parties and business partners; and, as applicable, collect fees based on your use of our Services. We cannot perform our Services in accordance with our terms, agreements or policies without processing your personal information for such purposes.

f) To Ensure the Security of the Services

We care about keeping you secure and safe while using our Services. Keeping you safe requires us to process your personal information, such as your device information, activity information and other relevant information. We use such information to combat spam, malware, malicious activities or security risks; improve and enforce our security measures; and to monitor and verify your identity so that unauthorized users do not gain access to your information. We cannot ensure the security of our Services if we do not process your personal information for security purposes.

g) To Maintain Legal and Regulatory Compliance

Our Services are subject to certain laws and regulations which may require us to process your personal information. For example, we process your personal information to pay our taxes, to fulfill our business obligations, ensure compliance with employment and recruitment laws or as necessary to manage risk as required under applicable law. Without processing your personal information for such purposes, we cannot perform the Services in accordance with our legal and regulatory requirements.

h) To Engage in Marketing Activities

Marketing lets us grow our community and update you about new products and services. We process your contact information or information about your interactions on our Services to: send you marketing communications and keep you updated about our products and services; provide you with information about events, training sessions or other materials; and deliver targeted marketing to you. See Cookies and Other Tracking Technologies section of this Privacy Policy for more information about tracking techniques we use for our marketing campaigns).

4. SHARING AND DISCLOSURE OF PERSONAL INFORMATION

We may share personal information in the following circumstances:

a) Service Providers

Unless prohibited by applicable law, we may share personal information with our third-party service providers that help us operate our business, such as for website hosting, professional services, analytics, customer service, e-mail delivery and auditing. Such service providers must process the personal information we share with them only on our behalf and for the same

purposes for which the personal information was collected. We will not sell or lease your personal information to any third parties for marketing purposes.

b) Affiliates

We share personal information within our corporate family for the purposes described in this Privacy Policy and as required or authorized by law. Affiliates are those companies that are under common control of our parent company IDEAL INDUSTRIES, INC.

c) Corporation Transaction

Unless prohibited by applicable law, we may share, transfer or delete your personal information if we are involved in a merger, sale, acquisition, divestiture, restructuring, reorganization, dissolution, bankruptcy or other change of ownership or control by IDEAL or any affiliated company (in each case, whether in whole or in part). If required by applicable law, any such sharing of personal information will be reported to regulators in accordance with the applicable law.

d) Other Lawful Disclosures

We may also share personal information: (i) if we determine that disclosure is necessary to comply with any law or legal process applicable to us or a request from law enforcement or other regulatory agency; (ii) to protect the rights, privacy, property, interests or safety of our company or our affiliates, customers, business partners, suppliers, employees or the general public; (iii) to pursue available remedies or limit damages; (iv) to enforce our Terms of Use; (v) to respond to an emergency; and (vi) as otherwise permitted by applicable law.

5. THIRD-PARTY WEBSITES AND SERVICES

Our Services and other materials may include links or references to third-party websites and services that we do not operate. A link or reference to a third-party service does not mean that we endorse it or the quality or accuracy of information presented. If you visit a third-party website or otherwise interact with that third-party, you are subject to that third party's privacy practices and policies, and we do not accept any responsibility or liability in this regard. This Privacy Policy does not apply to any personal information that you provide to these other websites and services.

6. SECURITY PRECAUTIONS

We implement appropriate technical and organizational measures designed to ensure your personal information is protected from unauthorized access, use, disclosure, alteration or destruction, in accordance with applicable laws and regulations. For example, we limit access of your personal information to authorized parties, periodically inspect, assess, and evaluate the effectiveness of our technical and organizational measures designed to ensure the security of our processing, and limit our collection and use of your personal information to the extent necessary to provide you with our services.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Site, you are responsible for keeping this password confidential. You should not share your password with anyone. We urge you to be careful about giving out information in public areas of the Site like message boards. The information you share in public areas may be viewed by any user of the Site.

Unfortunately, however, no system or online transmission of data is completely secure. We cannot guarantee the security of personal information. Any transmission is at your own risk and we request that you use appropriate security measures to protect your personal information . If you believe that personal information you provided to us is no longer secure, please notify us immediately using the contact information provided below.

7. RETENTION OF PERSONAL INFORMATION

We will keep your personal information for as long as necessary to fulfill the purposes we collected it for, including any legal, accounting or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information, whether we can achieve those purposes through other means, and all applicable legal requirements.

8. YOUR RIGHTS AND CHOICES

Marketing Information: If you do not wish to receive marketing-related emails from us or prefer us not to process your personal information for marketing purposes, please be sure that any relevant boxes on forms we use to collect your personal information are unchecked, click the unsubscribe link in one of our marketing emails, or contact us using the information in the section “How To Contact Us” at the end of this Privacy Policy. Please note that "opt-out" and "unsubscribe" requests may not take effect immediately and may take a reasonable amount of time to receive, process and apply, during which time your Information shall remain subject to the prior privacy settings. Additionally, you should be aware that any Information provided to third parties prior to your election to opt-out or unsubscribe will not be retrieved or rescinded, unless required by applicable law. Please note that even if we stop all marketing communications, you may still receive administrative, legal, and other important communications from us.

Correction: We must ensure that your personal information is accurate and up to date. Please advise us of any changes to your personal information by contact using the information in the “How To Contact Us” section below.

Rights of individuals in Australia: If you are located within Australia, you have the right to access personal information about you that we hold, and you may ask us to correct such personal information to ensure that it is accurate, up-to-date and complete. There is no charge to submit a request or to correct information, however we may apply an administrative charge for providing access to your personal information on request.

Please note that if you decide to exercise some of your rights, we may be unable to perform the actions necessary to achieve the purposes set out above or you may not be able to use or take full advantage of the services we offer.

If you wish to exercise any of your rights above, please contact us using the information in the “Contact Us” section at the end of this Privacy Policy. We may charge you a reasonable fee in case you request additional copies of your Personal Information or make other requests that are manifestly unfounded or excessive.

Individuals located in the European Economic Area, the United Kingdom or Switzerland (collectively “EEA”) at the time, please see Section 12, below for more information about your rights.

9. INTERNATIONAL TRANSFERS

When you access or use our Services, we may transfer your personal information to countries in the world where IDEAL conducts business. Such countries may be located outside of the country or jurisdiction where you are located and may have data protection laws that are less protective than the laws of the jurisdiction in which you reside. In such countries, we will still handle your personal information in the manner describe herein. If you do not want your information transferred to or processed or maintained outside of the country or jurisdiction where you are located, you should not use the Services.

Individuals located in the European Economic Area (“EEA”), the United Kingdom or Switzerland at the time they access our Services, please see Section 12, below.

10. CHILDREN’S PRIVACY

Our Services are not directed to or intended for use by minors. If we learn that we have received any personal information directly from a child under age 16, or such other age as set by the laws of jurisdictions where we operate without his or her parent’s verified consent, we will use that personal information only to respond directly to that child (or his or her parent or legal guardian) to inform the child that he or she cannot use our services and subsequently we will delete that personal information.

11. NOTICE TO CALIFORNIA RESIDENTS

This section applies only to California residents. Pursuant to the California Consumer Privacy Act of 2018 (“CCPA”), below is a summary for the last twelve (12) months of the “Personal Information” categories, as identified and defined by the CCPA (see California Civil Code section 1798.140 (o)), that we collect, the reason we collect the Personal Information, where we obtain the Personal Information, and the third parties that we may share the Personal Information.

We generally collect the following categories of Personal Information when you use our Services:

- identifiers such as a name, address, unique personal identifier, email, phone number, your device’s IP address, software, and identification numbers associated with your devices;
- commercial information such as records of products or services purchased, obtained, or considered by you;
- Internet or other electronic information regarding you browsing history, search history, the webpage visited before you came to our Site, length of visit and number of page views, click-stream data, locale preferences, your mobile carrier, date and time stamps associated with transactions, and system configuration information;
- your geolocation, to the extent you have configured your device to permit us to collect such information;
- your geolocation, to the extent you have configured your device to permit us to collect such information;

- audio recordings of your voice to the extent you call us, as permitted under applicable law; and
- inferences about your preferences, characteristics, behavior and attitudes.

We generally do not collect protected classifications about our users, biometric information, professional or employment-related information, or education-related information. For more information about the Personal Information we collect and how we collect it, please refer to Sections 1 and 2, above.

We collect your Personal Information for the business purposes described in Section 3, above. The CCPA defines a “business purpose” as the use of Personal Information for the business’s operational purposes, or other notified purposes, provided the use of Personal Information is reasonably necessary and proportionate to achieve the operational purpose for which the Personal Information was collected or another operational purpose that is compatible with the context in which the Personal Information was collected.

The categories of third parties with whom we may share your Personal Information are listed in Section 4, above.

Privacy Rights

If you are a California resident, you have rights in relation to your Personal Information; however, your rights are subject to certain exceptions. For instance, we cannot disclose specific pieces of Personal Information if the disclosure would create a substantial, articulable, and unreasonable risk to the security of the Personal Information your account with us or the security of our network systems.

- *Right Against Discrimination.* You have the right not to be discriminated against for exercising any of the rights described in this section. We will not discriminate against you for exercising your right to know, access, delete, or opt-out of sales.
- *Right to Know.* You have the right to request in writing: (i) a list of the categories of Personal Information, such as name, address, email address, that a business has disclosed to third parties during the immediately preceding calendar year for the third parties' direct marketing purposes, and (ii) the names and addresses of all such third parties. In addition, you have the right to request: (i) the categories of Personal Information we have collected about you, (ii) the categories of sources from which Personal Information is collected, (iii) the business or commercial purpose for the information collection, (iv) the categories of third parties with whom we have shared Personal Information, and (v) the specific pieces of Personal Information we hold about an individual.
- *Right to Access.* You have the right to request a copy of the specific Personal Information we collected about you during the 12 months before your request.
- *Right to Delete.* You have the right to request us delete any Personal Information we have collected from you or maintain about you, subject to certain exceptions.
- *Right to Opt-Out of Selling.* The CCPA broadly defines “Personal Information” and “selling” such that sharing identifiers and identifiers linked to you for a benefit may be considered a sale. You have the right to opt-out of having your Personal Information sold. We do not sell your Personal Information.

To assert your right to know or your right to delete your Personal Information, please contact us by email at privacy@idealindustries.com. To confirm your identity, we may ask you to verify Personal Information we already have on file for you. If we cannot verify your identity based on the information we have on file, we may request additional information from you, which we will only use to verify your identity, and for security or fraud-prevention purposes.

12. NOTICE TO INDIVIDUALS IN THE EUROPEAN ECONOMIC AREA, THE UNITED KINGDOM AND SWITZERLAND

This section only applies to individuals that access or use our Service while located in the EEA, United Kingdom and/or Switzerland (collectively, the “EEA”). We may ask you to identify which country you are located in when you use some of the Services or we may rely on your IP address to identify which country you are located in. When we rely on your IP address, we cannot apply the terms of this section to any individual that masks or otherwise hides their location information from us so as not to appear located in the EEA. If any terms in this section conflict with other terms contained in this Privacy Policy, the terms in this section shall apply to users in the EEA.

Our Relationship to You

This Privacy Policy is provided on behalf of **IDEAL** and each of its Family of Companies, and there are no joint controllers with regard to personal information collected under this Privacy Policy. Depending on the type of or location our services are provided, different Entities may be the data controller in relation to your personal information. The data controller (“**we**”, “**us**”, “**our**”) is the Entity named when we collect your personal information or in the location where IDEAL referred you to this Privacy Policy (e.g., the Entity identified in the email signature containing a link to this Privacy Policy). If no Entity has been clearly identified, the data controller or data controllers may be identified in the following order or precedence:

- For personal information that IDEAL collects on or through its websites and mobile applications, the Entity that operates the website or mobile application is the data controller.
- For personal information that is collected in connection with our newsletters and other marketing message, the data controller is identified on the subscription form and in each subsequent marketing message you receive.
- For personal information collected in connection with invitations and participation in events, the data controller will be the Entity which is organizing such event as identified in the announcement for the event.
- For personal information collected in the context of a recruitment process, the data controller is the Entity identified in the job posting.
- For personal information that IDEAL collects pursuant to a customer or contractor relationship, the IDEAL Entity with which you have the customer or contractor relationship is the data controller.
- For activities in the context of the procurement of products and services, the data controller will be the Entity identified in the order form or agreement.

Marketing

We will only contact individuals located in the EEA by electronic means (including email or SMS) based on our legitimate interests, as permitted by applicable law or the individual’s consent. When we rely on legitimate interest, we will only send you information about our Services that are similar to those which were the subject of a previous sale or negotiations of a

sale to you. If you do not want us to use your personal information in this way or to disclose your personal information to third parties for marketing purposes, please click an unsubscribe link in your emails or contact us at privacy@idealindustries.com. You can object to direct marketing at any time and free of charge.

Legal Bases for Processing Your Personal Information

Below is a list of the purposes described in our Privacy Policy with the corresponding legal bases for processing.

Legal Bases for Processing: Based on our contract with you or to take steps at your request prior to entering into a contract.

- Section 3 a) To Provide You Our Services
- Section 3 b) For Internal Use
- Section 3 c) To Provide You with Service-Related Communications
- Section 3 d) To Provide Customer Support or Respond to You
- Section 3 e) To Enforce Compliance with Our Terms and Agreements or Policies
- Section 3 f) To Ensure the Security of the Services
- Section 4 a) Disclosure to Service Providers

Legal Bases for Processing: Based on your consent.

- Section 3 h) To Engage in Marketing Activities

Legal Bases for Processing: Based on our legal obligations.

- Section 3 f) To Ensure the Security of the Services
- Section 3 g) To Maintain Legal and Regulatory Compliance
- Section 4 d) Other Lawful Disclosures

Legal Bases for Processing: To protect your vital interests.

- Section 4 d) Other Lawful Disclosures

Legal Bases for Processing: Based on our legitimate interests. When we process your personal data for our legitimate business interests we always ensure that we consider and balance any potential impact on you and your rights.

- Section 3 b) For Internal Use
- Section 3 c) To Provide You with Service-Related Communications
- Section 3 d) To Provide Customer Support or Respond to You
- Section 4 b) Disclosure to Our Affiliates Businesses
- Section 4 c) Disclosure Relating to Corporate Transactions

Your Individual Rights

We provide you with the rights described below when you use our Services. We may limit your individual rights requests in the following ways: (a) where denial of access is required or authorized by law; (b) when granting access would have a negative impact on other's privacy; (c) to protect our rights and properties; and (d) where the request is frivolous or burdensome.

If you would like to exercise your rights under applicable law, please contact us at privacy@idealindustries.com. Please note, we may seek to verify your identity when we receive an individual rights request from you in order to ensure the security of your personal information. When we fulfill your individual rights requests for correct (or rectification), erasure or restriction

of processing, we will notify third parties also handling the relevant personal information unless this proves impossible or involves disproportionate effort.

- *Right of Access.* Upon your request, we will provide you with a copy of your personal information in our files without undue delay and free of charge, unless we permitted by law to charge a fee.
- *Right to Rectification (or “Correction”).* You may request to correct or update any of your personal information in our files. We may provide you with the ability to update some or all of your personal information directly via the Services.
- *Right to Erasure (or the “Right to be Forgotten”).* Upon your request, we will erase any of your personal Information in our files that: is no longer necessary in relation to the purposes for which it was collected or otherwise processed; was collected in relation to processing that you previously consented to, but later withdrew such consent; or was collected in relation to processing activities to which you object and there are no overriding legitimate grounds for our processing.
- *Right to Data Portability.* If we process your personal information based on a contract with you or based on your consent or the processing is carried out by automated means, you may request to receive your personal information in a structured, commonly used and machine-readable format, and to have us transfer your personal information directly to another controller, where technically feasible. personal information.
- *Automated Individual Decision-Making, Including Profiling.* While you do have the right not to be subject to a decision based solely on automated processing of your personal information, including profiling, under applicable law, we do not subject your personal information to such processing activities.
- *Right to Object to and Right to Restrict Processing.* Under certain situations, you may object to or seek to restrict our processing of your personal information.

Complaints

If you believe that we have infringed or violated your rights under this Privacy Policy, please contact us at privacy@idealindustries.com so that we can work with you to resolve your concerns. You can also complain about our processing of your personal information to the relevant data protection authority where you live or work, or in the place where the alleged breach of data protection law has taken place.

International Transfers of Personal Information

We may store, process and transmit personal information in locations around the world, including locations outside of the country or jurisdiction where you are located. Such countries or jurisdictions may have data protection laws that are less protective than the laws of the jurisdiction in which you reside. If you do not want your information transferred to or processed or maintained outside of the country or jurisdiction where you are located, you should not use our Services.

We transfer your personal information subject to appropriate safeguards as permitted under the applicable data protection laws. Specifically, when your personal information is transferred out of the EEA, we have the required contractual provisions for transferring personal information in place with the third parties to which your information is transferred. For such transfers, we rely on legal transfer mechanisms such as Binding Corporate Rules, Standard Contractual Clauses,

or we work with US-based third parties that are certified under the EU-US and Swiss-US Privacy Shield Framework.

HOW TO CONTACT US

We welcome your questions or comments about this Privacy Policy or how we process your personal information. Please contact us using the information below and we will route your question or comment to the appropriate data controller by email at privacy@idealindustries.com, or by writing us at IDEAL INDUSTRIES, INC., Attn: Privacy, 1375 Park Avenue, Sycamore, Illinois 60178 USA.