

# PRIVACY POLICY

Last Updated: September 7<sup>th</sup>, 2023

**Note for California Residents:** This Policy describes how Sasa Demarle Inc. and its affiliates and subsidiaries, collects, uses, discloses, sells, shares, and retains your personal information on our websites, in our apps, when you participate in one of our events, and your right sand choices over our processing of your personal information. The Your Privacy Choices and Rights: Submitting Requests Under Applicable Local Laws section below contains specific details related to your rights under California law, including your right to opt-out of “sales” and/or “sharing” of personal information and to limit the use and disclosure of your sensitive personal information.

This Privacy Policy (“Policy”) describes how Sasa Demarle Inc., and its affiliates and subsidiaries, (“SDI”, “We”, “Us”, or “Our”) collects, uses, discloses, and retains personal information about individuals that interact with each website, online store, mobile site, application, marketing campaign, event, e-mail, newsletter, and other online or offline activity, offering, or publication that links to or references this Policy (collectively, the “Services”). For purposes of this Policy, “You” means the individual accessing or using the Services, or the company, or other legal entity, on behalf of which such individual is accessing or using the Services, as applicable. This Policy also describes the rights that you may have regarding our processing of personal information under applicable laws.

By accessing or using any of our Services, You acknowledge and agree that Your personal information will be handled as described in this Policy. Your use of the Services, and any dispute over privacy, is subject to this Policy and our Terms of Service, including, but not limited to, its applicable limitations of liability and the resolution of disputes. Our Terms of Service are incorporated by reference into this Policy.

## **I. CATEGORIES OF PERSONAL INFORMATION WE COLLECT ABOUT YOU.**

- A.** Personal information is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to You. Depending on the Services You use, We may collect the following categories of personal information about You directly from You, automatically though Your use of the Services, and from third parties.
- 1. Identifiers**, such as Your name, signature, postal address, zip code, e-mail address, telephone number, unique online identifier, IP address, user ID, device ID, or other similar identifier.
  - 2. Characteristics of protected classification under applicable law**, such as Your gender, age, marital status, nationality, and country of origin.

3. **Communication information**, such as Your purchase, registration, log-in, and Services usage history.
4. **Payment records**, such as your financial account information, credit card number, debit card number, or other payment card information, when necessary for the Services.
5. **Internet or other electronic network activity**, such as Your browser type and operating system; browsing history, clickstream data, search history on the Services, and information regarding Your interaction with an internet website, application, e-mail, newsletter, or advertisement, including, but not limited to, access logs and other activity information related to Your use of Our Services; the length of time You visit Our Services; and, the referring URL, or the website or application that led You to Our Services.
6. **Geolocation data**, such as the general physical location of Your device.
7. **Audio, electronic, visual, thermal, olfactory, or similar information**, such as voice recordings, video recordings, physical characteristics or description, and photos.
8. **Professional information**, such as occupation, employment history, professional contact information, education history, or other information provided by You in connection with the Services.
9. **Inferences**, such as inferences drawn to create a profile reflecting Your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.
10. **Sensitive personal information**, as defined under any applicable federal, state, or local law, such as certain characteristics of protected classifications set forth above, account login credentials and passwords, and financial account information, credit card number, debit card number, or other payment card information.

**B. Information We Collect Directly From You.** We collect personal information directly from You when You use Our Services, such as when You provide us with information online (i.e., create an account, submit a purchase order, register a product, submit a survey or review, upload or otherwise provide content or comments, etc.). If You register an account or set up a profile through Our Services, We may collect Your name, login credentials and password information, telephone number(s), postal address, e-mail address, and information regarding Your age, gender, or preferences (such as whether You want to receive offers, newsletters, etc.). If You make a purchase through Our Services, We may collect Your financial account information, credit card number, debit card number, or other payment card

information. If You contact Us, We may collect information such as Your name, e-mail address, social media handles, the contents of a message or attachments that You may send to Us, and other information that You choose to provide. We also may collect information that You provide about other people, for example, when You purchase one of Our products as a gift.

- C. **Information We Collect From Other Sources.** We collect personal information about You from other sources, such as third-party consumer data suppliers/resellers, data enrichment providers and aggregators, advertising networks, data analytics providers, internet services providers, operating systems and platforms, data brokers, social networks, business contact databases, government entities, other users, and Our subsidiaries, affiliates, and other related entities.
- D. **Social Network Integration.** If You choose to interact with us on social networking services or use features, such as plugins, widgets, or other tools made available by third party social networking services in connection with Our Services, We may collect personal information that has been made available to those services, including, but not limited to, personal information about Your contacts on those services. For example, some social networking services allow You to push content from Our Services to Your contacts or to pull information about Your contacts so You can connect with them on or through Our Service. Some social networking services will also facilitate Your registration from Our Services or enhance or personalize Your experience on Our Services.
- E. **Information We Collect Automatically.** We, and our third-party business partners, automatically collect personal information when You use Our Services using cookies, pixel tags, clear GIFs, or similar technologies. This may include information such as Your IP address and types of personal information described above as “Internet or other electronic network activity.” Please review Our section below on “Our Use of Cookies and Related Technologies” for additional information regarding Our use of cookies and related technologies.

## II. **HOW WE USE YOUR INFORMATION**

We use the categories of personal information described above for the following business and commercial purposes:

- A. **To Provide Our Services and Fulfill Your Requests.** We use Your information to provide and maintain Our Services, to process and fulfill Your requests, purchases, or orders, to communicate with You about Your use of Our Services, to respond to Your inquiries, and for other customer service and business administration purposes.

- B. **To Improve Our Services.** We use Your information to understand and analyze Our user base and how You use the Services, to improve and enhance the Services, and to develop new products, services, features, and functionality.
- C. **Identification and Authentication Purposes.** We may use Your information for identification and authentication purposes. For example, when You enter Your login ID and/or password to enter one of Our registration or login portals, We use Your credentials and password for authentication purposes.
- D. **Personalization.** We use Your information to tailor the content and information that We may send or display to You, to offer location customization, to provide personalized offers, personalized help and instructions, and to otherwise personalize Your experience while using Our Services.
- E. **Marketing and Promotional Purposes.** We may use Your information to send You product offers, news and newsletters, event updates, and to communicate with You about new products, features, or events offered by Us or Our third-party business partners, including, but not limited to, Our advertising, marketing, and sponsorship clients. We may also use Your information to gather broad demographic information, to analyze trends, to seek compatible advertisers, sponsors, clients, and customers, and to track users' movements around Our Services and elsewhere on the internet or across apps or devices (including for "OBA" as described below). Your general geolocation data may specifically be used to show You content (including, but not limited to, advertising and sponsored messaging) based on Your general geographic location. Where required by applicable federal, state, or local law, We will obtain Your prior consent before using Your personal information for marketing and promotional purposes.
- F. **Combining Information.** We (and our third-party business partners) may merge, co-mingle, or otherwise combine information, including Your personal information, in furtherance of the purposes described above.
- G. **To Comply With Legal Obligations.** We may use Your information where and when We believe necessary to comply with Our legal obligations or to exercise or defend Our rights or the rights of a third party, including, but not limited to, complying with requests of law enforcement or government authorities, participating in compliance audits, and complying with subpoenas and court orders.
- H. **To Protect Us and Others.** We may use Your information when and where We believe necessary to investigate, prevent, or take action regarding suspected or actual illegal activities, fraud, situations involving potential threats to the safety of any person, or to otherwise enforce this Policy or the integrity of Our Services.
- I. **De-Identified Data.** We may also de-identify or anonymize Your data in such a way that You may not reasonably be re-identified by Us or another party, and We may use this de-identified data for any purpose permitted under applicable federal,

state, or local law. To the extent We de-identify any data originally based on personal information, We will maintain and use such data in de-identified form and will not attempt to re-identify the data.

### III. **HOW WE DISCLOSE THE INFORMATION WE COLLECT**

A. We may disclose each of the categories of personal information described above for Our business and commercial purposes as follows:

1. **Related Entities.** We may disclose the personal information We collect about You to our subsidiaries, affiliates, and related entities, including, but not limited to, those listed at [us.silpat.com](http://us.silpat.com)
2. **Service Providers.** We may disclose the personal information We collect about You to service providers, contractors, and agents who perform functions and business operations on Our behalf for the purposes set forth above. For example, We may engage service providers to help Us with technical maintenance, database management, fraud prevention, market research, community and forums management, e-commerce, data management, authentication, Our products and product recommendations, and other advertising and marketing functionality, as well as credit/debit card or other payment processing, order fulfillment, authorizations, and address verification.
3. **Third Parties.** We may disclose the personal information We collect about You through areas of Our Services that may be managed or participated by one or more of Our third-party business partners. We may also disclose the personal information We collect about You to third party business partners, such as (i) companies that help Us with Our products and product recommendations; (ii) companies that help Us with purchase and order fulfillment, product shipment and delivery, payment processing, and returns and refunds; (iii) our advertising, marketing, and sponsorship clients to market their goods and services; (iv) consumer data suppliers/resellers, data enrichment providers and aggregators, and other entities in the online behavioral advertising ecosystem for purposes of OBA (as described below in this Policy), data optimization, lead generation, and other data driven projects; (v) social media and social networking services; and, (vi) lawyers, auditors, accountants, consultants, and other professional advisors.

B. We may also disclose Your personal information in the following circumstances:

1. **Business Transfers.** If (i) We, or Our affiliates, are or may be acquired by, merged with, or invested in by another company; or (ii) if any of Our assets are or may be transferred to another company, whether as part of a bankruptcy or insolvency proceeding or otherwise, We may transfer the information We have collected about You to the other company. As part of

the business transfer process, We may disclose certain of Your information to lenders, auditors, and third-party advisors, including, but not limited to, attorneys and consultants.

2. **In Response to Legal Process.** We may disclose Your personal information when and where We believe necessary to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a subpoena or court order.
3. **To Protect Us and Others.** We disclose Your personal information where We believe it is appropriate to do so to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of Our Terms of Service or this Policy, or as evidence in litigation in which We are involved.
4. **Aggregate and De-Identified Information.** We may disclose aggregate, anonymized, or de-identified information about You for any purpose permitted under applicable federal, state, or local law.
5. **Consent.** We may disclose Your personal information with Your consent.

#### IV. **OUR USE OF COOKIES AND RELATED TECHNOLOGIES**

- A. **Cookies/Local Device Storage.** Our Services will at times place and/or store code or other types of information and/or software on Your device or within Your browser, such as cookies, locally shared objects, and HTML5 (collectively, “Local Device Storage”). We, and Our third party business partners, may, independently or in conjunction, use Local Device Storage in connection with Our Services in a way that collects personal information for the purposes described in this Policy and their respective privacy policies, including, without limitation, to determine whether You have seen a particular advertisement before on the same or different device and to otherwise control and tailor the display of advertisements to You based on Your perceived preferences by collecting data to track the movements of individual users through Our Services and elsewhere on the internet over time and across unaffiliated websites, apps, and devices, as well as to help diagnose problems with servers, to gather broad demographic information, to conduct research, to deliver content, to record registration and personalization information, to inform offers that We may make to You, and to otherwise administer Our Services. For example, if You register on any part of Our Services and are given the option to save Your username and password, address, and/or credit/debit card number, We may provide this convenience to You via Local Device Storage.
  1. **Cookie Information.** We process user data to deliver (and measure the delivery of) content or advertisements, generate insights and reports to understand service usage, and/or access or store information on devices for

that purpose. Please see below to learn why we process data and Your options for processing.

- i. Strictly Necessary Cookies. These cookies are necessary for Our website and Services to function properly and cannot be switched off in Our systems. They are usually only set in response to actions made by You which amount to a request for Services, such as setting Your privacy preferences, logging in, filling in forms, or submitting an order. You can set Your browser to block or alert You about these cookies, but some parts of Our Services and/or website will not work. These cookies do not store any personally identifiable information.
- ii. Performance Cookies. These cookies allow Us to count visits and traffic sources so We can measure and improve the performance of Our Services and website. These cookies help Us to know which pages are the most and least popular and see how visitors move around Our Services and website. 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 Services and/or website and will not be able to monitor its performance.
- iii. Targeting Cookies. These cookies may be set through Our Services and/or website by Our advertising partners. They may be used by those companies to build a profile of Your interests and show You relevant advertisements on other sites. They do not directly store personal information, but are based on uniquely identifying Your browser, internet device, and/or Local Storage Device. If You do not allow these cookies, You will experience less targeted advertising.
- iv. Other Cookies. These cookies may be set through Our Services and/or website by Us or Our partners. These are cookies that may allow Us to count visits and traffic sources so We can measure and improve the performance of Our Services. If You do not allow these cookies, We will not know when You have visited Our Services and/or website and will not be able to monitor its performance.
- v. Functional Cookies. These cookies enable Our website and/or the Services to provide enhanced functionality and personalization. They may be set by Us or by third party providers whose services We have added to Our Services and/or website. If You do not allow these cookies, then some or all of these services, including, but not limited to, Our Services, may not function properly.

- B. You May Disable Local Device Storage.** If You do not want Local Device Storage, Your device, browser, or the settings menu with an application may include an option that allows You to not accept it. However, if You disable Local Device Storage, some portion of Our Services may not be available to You or function properly.
- C. Tracking Technologies.** In addition to Local Device Storage, We, and/or Our third party business partners, may use web beacons, web bugs, internet or pixel tag, clear GIFs, digital fingerprinting (also known as “Machine Identification”) and similar technologies (collectively, together with Local Device Storage, the “Tracking Technologies”) on Our Services, including, but not limited to, in Our communications with You, such as within e-mail and text messages, in-application push notifications, videos, and throughout Your use of Our Services. We, and our third-party business parties, use Tracking Technologies to determine which messages have been opened by recipients and for all or some of the same lawful purposes described above for use of Local Device Storage. For additional information, see the Online Behavioral Advertising (OBA) section below.
- D. Do Not Track (DNT).** Your browser settings may allow You to automatically transmit a “Do Not Track” (DNT) signal to websites and online services that You visit. There is no consensus as to what DNT means in this context and, since some browsers apply DNT signals by default, it does not necessarily reflect Our visitors’ choice as to whether they wish to receive advertisement tailored to their interests. As a result, like many websites, We do not alter Our practices when Our Services receive a DNT signal from a visitor’s browsers. As set forth below You may opt-out of the use of Your personal information for online behavioral advertising by third parties at any time. To find out more about DNT, please visit <http://allaboutdnt.com>.
- E. Global Privacy Control (GPC) and Similar Privacy Preference Signals.** Where required by applicable federal, state, or local law, and as further described in the Your Privacy Choices and Rights: Submitting Requests Under Applicable Laws section below, We honor user-initiated browser based opt-out preference signals recognized under applicable state and local law, such as the Global Privacy Control (“GPC”). To find out more about GPC, please visit <https://globalprivacycontrol.org/>.

**V. ONLINE BEHAVIORAL ADVERTISING (OBA) AND HOW TO OPT-OUT**

- A. How OBA Works.** We, and Our third-party business partners, use Tracking Technologies on Our Services for purposes of “online behavioral advertising” (“OBA”). OBA allows the serving of advertisements tailored to perceived interests inferred by Your browsing on Our Services and on other sites, applications, destinations, and services, over time and across unaffiliated websites, apps, and services, using the same or a different device. To enable OBA, We, and our third party business partners, independently use Tracking Technologies to collect certain



information, some of which may be deemed personal information, including, but not limited to, for example, the make, model, settings, specifications (i.e., CPU speed, connection speed, browser type, operating system, device identifier, online identifier, etc.) and geographical location of Your device, as well as date/time stamp, IP address, pages visited, time of visits, content viewed, ads viewed, the site(s), application(s), destination(s), and/or service(s) You arrived from, and other clickstream data. Your e-mail address may also be used by Us, in coordination with third party audience authentication service providers, to enable OBA.

- B. Opt-Out of OBA.** If You do not want OBA, You may be able to opt-out by visiting [us.silpat.com](https://us.silpat.com). Please note that these opt-out options only apply to tracking by third party business partners using cookie-based OBA across our Services and other sites, applications, destinations, and services, and not tracking among pages within Our Services itself. As may be required under applicable law, to opt-out of OBA enabled by use of Your e-mail address in coordination with audience authentication providers, see the Your Privacy Choices and Rights: Submitting Requests Under Applicable Laws section below.

## **VI. YOUR PRIVACY CHOICES AND RIGHTS: SUBMITTING REQUESTS UNDER APPLICABLE LAWS**

- A.** You may have certain rights regarding Our processing of Your personal information under applicable law, including, but not limited to, if You are a consumer in California, Colorado, Connecticut, Utah, or Virginia. If Our processing of Your personal information is governed by such laws, this section provides You with additional information regarding Your rights and Our processing of Your personal information under such applicable laws.
- B. Our Processing of Your Personal Information.** As may be required under applicable law, below is a description of Our business and commercial purposes for processing Your personal information as well as the categories of third parties to whom We may disclose, “sell”, or “share” for cross-contextual behavioral advertising (as those terms are defined under applicable law) the categories of personal information described above for Our business and commercial purposes.

**1. Category of Personal Information. Identifiers.**

**i. Our Business or Commercial Purposes for Processing.**

- To provide Our Services and fulfill Your requests.
- To improve Our Services.
- Identification and authentication purposes.

- Personalization.
- Marketing, advertising, and promotional purposes.
- To comply with legal obligations.
- To protect Us and others.

ii. Categories of Third Parties to Whom We May Disclose Personal Information for a Business Purpose.

- Data storage and security providers.
- Purchase and order fulfillment providers.
- Product shipment and delivery providers.
- Payment processors.
- Return and refund providers.
- Database management providers.
- Advertising, marketing, social media, sales, and advertising facilitating companies.
- Audience authentication providers.
- Community and forum management providers,
- Market research and data enrichment providers.
- E-commerce providers.
- Companies that help with Our products and product recommendations.
- Related entities, such as subsidiaries and affiliates.
- Professional advisors (such as lawyers, accountants, and consultants).
- Governmental and law enforcement officials or parties to legal proceedings.

iii. Categories of Third Parties to Whom We May “Sell” or “Share” Personal Information.

- Advertising, marketing, social media, and advertising facilitating companies (including list buyers and advertising clients).
- Data cooperatives, suppliers, providers, and aggregators.
- E-commerce providers.
- Companies that help with Our products and product recommendations.

2. Category of Personal Information. *Protected Characteristics.*

i. Our Business or Commercial Purposes for Processing.

- To provide Our Services and fulfill Your requests.
- To improve Our Services.
- Identification and authentication purposes.
- Personalization.
- Marketing, advertising, and promotional purposes.
- To comply with legal obligations.
- To protect Us and others.

ii. Categories of Third Parties to Whom We May Disclose Personal Information for a Business Purpose.

- Data storage and security providers.
- Purchase and order fulfillment providers.
- Product shipment and delivery providers.
- Payment processors.
- Return and refund providers.
- Database management providers.

- Advertising, marketing, social media, sales, and advertising facilitating companies.
  - Audience authentication providers.
  - Community and forum management providers,
  - Market research and data enrichment providers.
  - E-commerce providers.
  - Companies that help with Our products and product recommendations.
  - Related entities, such as subsidiaries and affiliates.
  - Professional advisors (such as lawyers, accountants, and consultants).
  - Governmental and law enforcement officials or parties to legal proceedings.
- iii. Categories of Third Parties to Whom We May “Sell” or “Share” Personal Information.
- Advertising, marketing, social media, and advertising facilitating companies (including list buyers and advertising clients).
  - Companies that help with Our products and product recommendations.

3. Category of Personal Information. *Commercial Information.*

- i. Our Business or Commercial Purposes for Processing.
- To provide Our Services and fulfill Your requests.
  - To improve Our Services.
  - Identification and authentication purposes.
  - Personalization.
  - Marketing, advertising, and promotional purposes.

- To comply with legal obligations.
- To protect Us and others.

**ii.** Categories of Third Parties to Whom We May Disclose Personal Information for a Business Purpose.

- Data storage and security providers.
- Purchase and order fulfillment providers.
- Product shipment and delivery providers.
- Payment processors.
- Return and refund providers.
- Database management providers.
- Advertising, marketing, social media, sales, and advertising facilitating companies.
- Audience authentication providers.
- Community and forum management providers,
- Market research and data enrichment providers.
- E-commerce providers.
- Companies that help with Our products and product recommendations.
- Related entities, such as subsidiaries and affiliates.
- Professional advisors (such as lawyers, accountants, and consultants).
- Governmental and law enforcement officials or parties to legal proceedings.

**iii.** Categories of Third Parties to Whom We May “Sell” or “Share” Personal Information.

- Advertising, marketing, social media, and advertising facilitating companies (including list buyers and advertising clients).
- Data cooperatives, suppliers, providers, and aggregators.
- E-commerce providers.
- Companies that help with Our products and product recommendations.

4. Category of Personal Information. *Payment Records.*

i. Our Business or Commercial Purposes for Processing.

- To provide Our Services and fulfill Your requests.
- To improve Our Services.
- Identification and authentication purposes.
- To comply with legal obligations.
- To protect Us and others.

ii. Categories of Third Parties to Whom We May Disclose Personal Information for a Business Purpose.

- Purchase and order fulfillment providers.
- Product shipment and delivery providers.
- Payment processors.
- Return and refund providers.

iii. Categories of Third Parties to Whom We May “Sell” or “Share” Personal Information.

- None.

5. Category of Personal Information. *Internet or Other Electronic Network Activity.*

i. Our Business or Commercial Purposes for Processing.

- To provide Our Services and fulfill Your requests.
- To improve Our Services.
- Identification and authentication purposes.
- Personalization.
- Marketing, advertising, and promotional purposes.
- To comply with legal obligations.
- To protect Us and others.

**ii.** Categories of Third Parties to Whom We May Disclose Personal Information for a Business Purpose.

- Data storage and security providers.
- Purchase and order fulfillment providers.
- Product shipment and delivery providers.
- Payment processors.
- Return and refund providers.
- Database management providers.
- Advertising, marketing, social media, sales, and advertising facilitating companies.
- Audience authentication providers.
- Community and forum management providers,
- Market research and data enrichment providers.
- E-commerce providers.
- Companies that help with Our products and product recommendations.
- Related entities, such as subsidiaries and affiliates.

- Professional advisors (such as lawyers, accountants, and consultants).
  - Governmental and law enforcement officials or parties to legal proceedings.
- iii.** Categories of Third Parties to Whom We May “Sell” or “Share” Personal Information.
- Advertising, marketing, social media, and advertising facilitating companies (including list buyers and advertising clients).
  - Data cooperatives, suppliers, providers, and aggregators.
  - E-commerce providers.
  - Companies that help with Our products and product recommendations.

**6.** Category of Personal Information. *Geolocation Data.*

- i.** Our Business or Commercial Purposes for Processing.
- To provide Our Services and fulfill Your requests.
  - To improve Our Services.
  - Identification and authentication purposes.
  - Personalization.
  - Marketing, advertising, and promotional purposes.
  - To comply with legal obligations.
  - To protect Us and others.
- ii.** Categories of Third Parties to Whom We May Disclose Personal Information for a Business Purpose.
- Data storage and security providers.
  - Purchase and order fulfillment providers.
  - Product shipment and delivery providers.



- Payment processors.
- Return and refund providers.
- Database management providers.
- Advertising, marketing, social media, sales, and advertising facilitating companies.
- Community and forum management providers,
- Market research and data enrichment providers.
- E-commerce providers.
- Related entities, such as subsidiaries and affiliates.
- Professional advisors (such as lawyers, accountants, and consultants).
- Governmental and law enforcement officials or parties to legal proceedings.

iii. Categories of Third Parties to Whom We May “Sell” or “Share” Personal Information.

- Advertising, marketing, social media, and advertising facilitating companies (including list buyers and advertising clients).
- Data cooperatives, suppliers, providers, and aggregators.
- E-commerce providers.
- Companies that help with Our products and product recommendations.

7. Category of Personal Information. *Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information.*

i. Our Business or Commercial Purposes for Processing.

- To provide Our Services and fulfill Your requests.
- To improve Our Services.

- Identification and authentication purposes.
  - Personalization.
  - Marketing, advertising, and promotional purposes.
  - To comply with legal obligations.
  - To protect Us and others.
- ii. Categories of Third Parties to Whom We May Disclose Personal Information for a Business Purpose.
- Data storage and security providers.
  - Purchase and order fulfillment providers.
  - Product shipment and delivery providers.
  - Payment processors.
  - Return and refund providers.
  - Database management providers.
  - Companies that help with Our products and product recommendations.
  - Related entities, such as subsidiaries and affiliates.
  - Professional advisors (such as lawyers, accountants, and consultants).
  - Governmental and law enforcement officials or parties to legal proceedings.
- iii. Categories of Third Parties to Whom We May “Sell” or “Share” Personal Information.
- None.
8. Category of Personal Information. *Professional Information.*
- i. Our Business or Commercial Purposes for Processing.

- To provide Our Services and fulfill Your requests.
- To improve Our Services.
- Identification and authentication purposes.
- Personalization.
- Marketing, advertising, and promotional purposes.
- To comply with legal obligations.
- To protect Us and others.

**ii.** Categories of Third Parties to Whom We May Disclose Personal Information for a Business Purpose.

- Data storage and security providers.
- Purchase and order fulfillment providers.
- Product shipment and delivery providers.
- Advertising, marketing, social media, sales, and advertising facilitating companies.
- Market research and data enrichment providers.
- E-commerce providers.
- Companies that help with Our products and product recommendations.
- Related entities, such as subsidiaries and affiliates.
- Professional advisors (such as lawyers, accountants, and consultants).
- Governmental and law enforcement officials or parties to legal proceedings.

**iii.** Categories of Third Parties to Whom We May “Sell” or “Share” Personal Information.

- Advertising, marketing, social media, and advertising facilitating companies (including list buyers and advertising clients).
- E-commerce providers.

9. Category of Personal Information. *Inferences.*

i. Our Business or Commercial Purposes for Processing.

- To provide Our Services and fulfill Your requests.
- To improve Our Services.
- Identification and authentication purposes.
- Personalization.
- Marketing, advertising, and promotional purposes.
- To comply with legal obligations.
- To protect Us and others.

ii. Categories of Third Parties to Whom We May Disclose Personal Information for a Business Purpose.

- Data storage and security providers.
- Purchase and order fulfillment providers.
- Product shipment and delivery providers.
- Payment processors.
- Return and refund providers.
- Database management providers.
- Advertising, marketing, social media, sales, and advertising facilitating companies.
- Community and forum management providers,
- Market research and data enrichment providers.

- E-commerce providers.
- Companies that help with Our products and product recommendations.
- Related entities, such as subsidiaries and affiliates.
- Professional advisors (such as lawyers, accountants, and consultants).
- Governmental and law enforcement officials or parties to legal proceedings.

**iii.** Categories of Third Parties to Whom We May “Sell” or “Share” Personal Information.

- Advertising, marketing, social media, and advertising facilitating companies (including list buyers and advertising clients).
- E-commerce providers.
- Companies that help with Our products and product recommendations.

**10.** Category of Personal Information. *Information that May Be Treated as Sensitive under Applicable Law.*

**i.** Our Business or Commercial Purposes for Processing.

- To provide Our Services and fulfill Your requests.
- To improve Our Services.
- Identification and authentication purposes.
- Personalization.
- Marketing, advertising, and promotional purposes.
- To comply with legal obligations.
- To protect Us and others.

**ii.** Categories of Third Parties to Whom We May Disclose Personal Information for a Business Purpose.

- Data storage and security providers.
- Purchase and order fulfillment providers.
- Product shipment and delivery providers.
- Payment processors.
- Return and refund providers.
- Database management providers.
- Advertising, marketing, social media, sales, and advertising facilitating companies.
- Companies that help with Our products and product recommendations.
- Related entities, such as subsidiaries and affiliates.
- Professional advisors (such as lawyers, accountants, and consultants).
- Governmental and law enforcement officials or parties to legal proceedings.

**iii.** Categories of Third Parties to Whom We May “Sell” or “Share” Personal Information.

- Advertising, marketing, social media, and advertising facilitating companies (including list buyers and advertising clients).
- E-commerce providers.
- Companies that help with Our products and product recommendations.

**11.** To opt-out of Our “sale” or “sharing” of Your personal information under applicable law, please see Our section below on Your Privacy Choices and Rights: Submitting Requests for additional details.

**C.** **Retention.** Your personal information will be held for only so long as it is necessary for the purposes for which it was originally collected and in accord with applicable law. We will retain Your personal information for the period

necessary to fulfill the purposes outlined in this Policy. When assessing retention periods, We first examine whether it is necessary to retain the personal information collected and, if retention is required, work to retain the personal information for the shortest possible period permissible under applicable law.

## **VI. YOUR PRIVACY CHOICES AND RIGHTS: SUBMITTING REQUESTS UNDER APPLICABLE LOCAL LAWS**

### **A. Rights under Applicable Local Laws.**

1. Subject to the jurisdiction in which You live, including if You are a consumer in California, Colorado, Connecticut, Utah, or Virginia, You may have the following rights under applicable local law:
  - i. Right to Know: Request information about Our processing of Your personal information;
  - ii. Right to Access: Request a copy of Your personal information;
  - iii. Right to Correct: Rectify, correct, or update the personal information We hold about You;
  - iv. Right to Restrict: Restrict or limit Our use of Your personal information or You sensitive personal information;
  - v. Right to Portability: Ask that We transfer the personal information We maintain about You to another organization, or to You, in certain circumstances;
  - vi. Right to Deletion: Request deletion of Your personal information;
  - vii. Right to Opt-Out:
    - Opt-out of “sales” of personal information or “sharing of personal information for cross-contextual behavioral advertising purposes (as these terms are defined under applicable local law);
    - Opt-out of targeted advertising;
  - viii. Right to Object: Object to Our use of Your personal information;
  - ix. Right to Withdrawal Consent: Where You have provided consent, withdraw such consent to Our possession of Your personal information at any time;

- x. Right to File Complaint: Lodge or file a Complaint; and/or,
  - xi. Right to Exercise Rights: Not be unlawfully discriminated against for exercising Your rights.
2. The above rights may be limited or denied in some circumstances. For example, We may retain Your personal information where required or permitted by applicable law.
  3. We may “sell” or “share” for cross-contextual behavioral advertising Your personal information (as these terms are defined under applicable local law). We do not have actual knowledge of selling or sharing the personal information of consumers that are at least 13 and less than 16 years of age. To the extent We have actual knowledge that a consumer is at least 13 and less than 16 years of age, We will request affirmative authorization from the individual and/or guardian before selling or sharing the personal information, to the extent required under applicable local law.
  4. We use and disclose certain of Your personal information for OBA and cross-contextual behavioral advertising. To learn more about Your rights to limit Our use and disclosure of sensitive personal information under applicable law, please see the Submitting Requests section below.

**B. Submitting Requests.**

1. To exercise Your rights under applicable local law, or if You are an authorized agent or parent or guardian seeking to exercise rights on behalf of a minor in accord with applicable local law (specifically, including, but not limited to, California, Colorado, Connecticut, Utah, and Virginia), please follow the below instructions:
  - i. To exercise Your right to opt-out of Our “sale” or “sharing” of Your personal information, to opt-out of the use of Your personal information for targeted advertising purposes, or to limit Our use of Your sensitive personal information (collectively, “Opt-Out”), as may be available to You under applicable local law, please see the following:
    - To Opt-Out of such uses through online sales and shares on or in connection with the Services, you will be able to click on a link. Toggle settings are generally browser-specific, Service-specific, and device-specific and may reset if cookies are cleared. If You have any questions or need assistances exercising Your rights, please contact Us by e-mail or as described at the end of this Policy.



- To Opt-Out of other sales shares, on or in connection with the Services, such as by using Your e-mail address to identify You online for targeted advertising or, as applicable, by Our sharing Your name and mailing address with third parties for their marketing purposes, contact Us by e-mail or as described at the end of this Policy and provide the following information:
    - Your State of residency;
    - Your name;
    - Your address;
    - Your account number, if any;
    - Your e-mail address; and,
    - the details of Your request.
  - ii. To exercise Your rights to know, access, correct, delete, restrict, object, or portability, under applicable local law as described above, contact Us as described at the end of this Policy or submit a request to Us with the following information:
    - Your State of residency;
    - Your name;
    - Your address;
    - Your account number, if any;
    - Your e-mail address; and,
    - the details of Your request.
  - 2. California residents may view metrics for California Consumer Privacy Act (“CCPA”)-related requests We have received during the calendar year by contacting us at the e-mail address and/or telephone number provided at the end of this Policy.
- C. **Verification.** We reserve the right to take reasonable steps to verify Your identity before fulfilling Your requests to know, correct, or delete. For example, We may seek to establish Your identity to a reasonable degree of certainty by matching information that You submit alongside Your request with information

that We have in Our records. We may ask You, or Your authorized agent, for supplemental information as needed to establish Your identity. Authorized agents may also be required to provide a copy of the consumer's signed permission authorizing the agent to submit requests on the consumer's behalf under applicable local law.

- D. **Appeals.** You may have a right to appeal a decision We make relating to requests to exercise Your rights under applicable local law. To appeal a decision, please contact Us by e-mail or as described at the end of this Policy.
  
- E. **California Online Erasure Law.** California's Online Erasure" law, Business and Professional Code §§ 22580-22582, requires operators of certain websites and online services to allow registered users who are under the age of 18 and residents of the State of California to request removal of content they post. If You fit this description and posted content on a section of Our Services that is directed to California residents at least 13 and younger than 18 years of age, You may request removal of the content by contacting Our Privacy Policy Coordinator by e-mail or as described at the end of this Policy. In response to Your Request, We may elect to make the content invisible to other users and the public (rather than deleting it entirely), in which case the content may remain on servers We control and/or may be publicly available elsewhere if a third party copied and reposted the content.

## VII. **OPT-OUT OF MARKETING COMMUNICATIONS**

- A. If You do not wish to receive future marketing or other commercial messages from Us, simply follow the unsubscribe instructions contained within the message You receive. Note, however, that You may continue to receive certain communications from Us that are necessary for the Services, such as notifications, invoices, technical notices, updates, security alerts, and support.

## VIII. **SECURITY OF MY INFORMATION**

- A. We implement physical, technical, and organizational security measures designed to safeguard personal information. These measures are aimed to protect the personal information We collect from disclosure, alteration, destruction, loss, misuse, and unauthorized access.
  
- B. The security of Your personal information is important to Us, but remember that no method of transmission or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect Your personal information, We cannot guarantee its absolute security.

## IX. **THIRD PARTY LINKS**

- A. Our Service may contain links to third party or other websites and applications that are not operated by Us. If You click on a third-party link, You will be directed to that third party's site which is not governed by this Policy and, instead, is governed by the privacy policies of those third-party sites.
- B. We strongly advise You to review the Privacy Policy of every site and/or application You visit.
- C. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services. We are not responsible for the information practices of such third-party sites, applications, and/or services.

#### **X. BE CARE PUBLICLY POSTING PERSONAL INFORMATION**

- A. Please be aware that content and personal information that You disclose in publicly accessible portions of the Services may be available to other users, and may also be available outside the Services by third parties, so You should be mindful of all personal information, especially, sensitive personal information, that You may wish to post. To the extent required by applicable law, We may require that You obtain the consent of any individual whose personal information You post on Our Services.

#### **XI. INTERNATIONAL TRANSFERS**

- A. Your personal information may be processed, transferred to, and/or maintained on servers and databases located outside of the jurisdiction in which You are based and where the privacy laws may not be as protective as Your jurisdiction. Where required by applicable law, We have put in place appropriate safeguards in accord with applicable legal requirements to ensure that Your data is adequately protected. For more information on the appropriate safeguards in place, please contact Us at the details below in the Contact Us section of this Policy.

#### **XII. CHILDREN**

- A. Our Services do not address anyone under the age of 13. We do not knowingly collect personal information from anyone under the age of 13. If You are a parent or guardian and You are aware that Your child has provided Us with personal information, please contact Us at the details below in the Contact Us section of this Policy.
- B. If We become aware that We have collected personal information from anyone under the age of 13 without verification of parental consent, We will endeavor to remove that information from Our servers and systems.

- C. If We need to rely on consent as a legal basis for processing Your information and Your country requires consent from a parent, We may require Your parent's consent before We collect and use that information.

### **XIII. CONTACT US**

- A. If You have any questions about the privacy aspects of Our Services or would like to make a complaint, request, or have any questions about Your rights under this Policy, please contact Us at:
  - 1. E-Mail: [customerservice@silpat.com](mailto:customerservice@silpat.com); or,
  - 2. Website: [us.silpat.com](http://us.silpat.com) (contacts section).
- B. Please make sure to include enough information for Us to help You, including, for example, Your name, contact information, details of your complaint, question, issue, or request, and the specific website, mobile site, application, and/or other service You are contacting Us about.

### **XIV. CHANGES TO THIS POLICY**

- A. This Policy is current as of the "Last Updated" date set forth above.
- B. We may update this Policy from time to time. We will notify You of any changes by posting the new Policy on this page.
- C. If We make any changes to this Policy that materially affect Our practices with regard to the information We have previously collected about You, We will endeavor to provide You with notice via e-mail and/or a prominent notice on Our Services, prior to the changes becoming effective, and update the "Last updated" date at the top of this Policy.
- D. You are advised to review this Policy periodically for any changes. Changes to this Policy are effective when they are posted on this page.