

## SCHLETTER PRIVACY POLICY

Last updated: November 5, 2018

Schletter NA Inc. (“Schletter” or “the Company” or “we”) knows that you care how information about you is used and shared, and we appreciate your trust that we will do so carefully and sensibly. This description of Schletter’s Privacy Policy (“Policy”) applies to all websites posted by Schletter (collectively, the “Sites”). When a Site is posted by Schletter, the Site will link to this Policy, and this Policy applies. When sites are posted by third parties, the privacy statement of the third party applies, and this Policy does not apply. **By visiting a Schletter Site you are accepting the practices described in this Policy.** You are encouraged to review this Policy whenever you visit the Sites to make sure that you understand how any personal information you provide will be used.

### 1. COLLECTION OF INFORMATION

1.1 *General.* Schletter offers a variety of services that are collectively referred to as the “Services.” Schletter collects information from individuals who visit the Sites (“Visitors”) and individuals who use the Services (“Customers”).

1.2 *Types.* Schletter may store any information you enter on a Site or in any other way provide to the Company including information automatically collected when you visit a Site, such as via cookies. This information may include your name, mailing address, phone and fax numbers, e-mail address, contact preferences, credit card information and your company name and mailing address (“Personal Information”). For example, when you express an interest in obtaining additional information about a Service, we collect your name, phone number, company name and e-mail address. When you place an order or create a Schletter online account (“Account”), we collect your name, company information, mailing address, e-mail address, phone and fax numbers and credit card information.

1.3 *Purpose.* Schletter may use your Personal Information for various purposes, including without limitation, to fulfill and manage orders, process payments and respond to requests for order status updates. Schletter may also use your Personal Information to send you marketing communications and other information regarding our products, promotions or special events. Additionally, your Personal Information may be used to generate statistics and reports for internal data analysis, to develop and manage Schletter’s business operations and to meet legal and regulatory requirements.

1.4 *Website Navigational Information.* As you navigate a Site, Schletter may also collect information (“Website Navigational Information”) through the use of commonly used information-gathering tools, such as cookies and web beacons. Website Navigational Information includes standard information from your web browser (such as browser type and browser language), your Internet Protocol (“IP”) address, the full Uniform Resource Locator (URL) clickstream to, through, and from a Site (including date and time), the actions you take on a Site, such as the web pages viewed, the links clicked, products you viewed or searched for, and your purchase history. We sometimes aggregate purchase history information from Customers to create features such as bestsellers and product suggestions.

1.5 *Cookies.* The Sites use Google Analytics, a web analytics service provided by Google, Inc. (“Google”). Google Analytics uses “cookies”, which are text files placed on your computer, to help track how you interact with a Site. The information generated by the cookie about your use of a Site (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of a Site, compiling reports on your Site activity and providing other services relating to site activity and internet usage. Google may also transfer this information to third parties if required to do so by law, or if such third parties process the information on Google’s behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, but doing so may limit the

functionality of the Sites. By using a Site, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

**1.6 Web Beacons.** Schletter uses web beacons alone or in conjunction with cookies to compile information about Customers' and Visitors' usage of a Site and interaction with e-mails from the Company. Web beacons are transparent images or code placed on websites or e-mails that track which link a user clicks on. For example, Schletter may place web beacons in marketing e-mails that notify the Company when you click on a link in the e-mail that directs you to a Schletter Site. Schletter uses web beacons to operate and improve the Company's Sites and e-mail communications.

**1.7 Software Used.** During some visits we may use software tools such as JavaScript to measure and collect session information, including page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

## **2. SHARING OF INFORMATION COLLECTED**

**2.1 General.** We respect and value the information you enter on the Sites. Schletter is not in the business of selling this information to other websites or businesses. There are very limited circumstances in which we do share some Visitor and Customer information, and these are outlined immediately below.

**2.2 Sharing of Information.** Information you enter on a Site may be shared with Schletter's parent company, Schletter GmbH, a German company, and its other subsidiaries and affiliates. We may share your information with third parties who provide services on our behalf, such as credit card processing and delivering packages. These third-parties are not permitted to store, retain, or use your information except for the sole purpose of performing their services on Schletter's behalf. Schletter reserves the right to disclose your information if the Company believes disclosure is appropriate to comply with the law; to enforce or apply our Conditions of Use, Privacy Policy, and/or Terms and Conditions of Sale; or to protect the rights, property, or safety of Schletter. We may also share information with governmental agencies or other companies assisting us in fraud prevention or investigation when: (i) permitted or required by law; (ii) trying to protect against or prevent actual or potential fraud or unauthorized transactions; or (iii) investigating fraud which has already taken place. The information is not provided to these governmental agencies or other companies for marketing purposes.

## **3. INFORMATION FROM OTHER SOURCES**

**3.1 General.** Occasionally, we supplement the information we receive that is outlined above with information from other sources and companies.

**3.2 Types.** Schletter may receive the following types of information from other sources: search term and search result information from some searches conducted through web search features; search results and links, including results from paid listings such as sponsored links from Google; and updated Customer delivery and address information from our carriers or other third parties.

## **4. INFORMATION SECURITY**

**4.1 Software Used.** To protect the security of your information during transmission, we use Secure Sockets Layer (SSL) software, which encrypts information you input.

**4.2 Order Confirmation.** To process an order or payment, it is necessary to transmit the entire credit card number to the appropriate credit card company. In all other cases, we reveal only the last four digits of your credit card number.

**4.3 Signing off.** To prevent unauthorized access to sensitive information, it is important for you to monitor those who have access to (i) your Account Username and Password, (ii) your Schletter customer account number, and (iii) your computer. Be sure to log off when you have finished using a shared computer.

## **5. USER ACCESS TO INFORMATION**

5.1 *General.* You may update and/or view your Personal Information that we have collected, as well as your online order and/or payment history, by logging into your Account. You should frequently verify that your Personal Information is up to date in order to ensure that you have the best experience with the Sites.

## **6. USER CHOICES WITH REGARD TO ACCESS OF INFORMATION**

6.1 *General.* You always have the right to refrain from providing any information. This may have an impact on your use of a Site and reduce the benefit of certain unique features of a Site.

6.2 *Communication Preferences.* Schletter offers Customers and Visitors who provide Contact Information the means to choose how the Company uses the information provided. If you do not want to receive marketing and non-transactional e-mail or other communications from any Site, you can manage your receipt of marketing and non-transactional communications by clicking on the “unsubscribe from this list” link located in the Company's marketing e-mails. Additionally, you may send a request specifying your communications preferences to [marketing@schletter.us](mailto:marketing@schletter.us). The Conditions of Use and other legal notices, such as this Policy, govern your use of the Sites, and it is your responsibility to review them for changes. Customers cannot opt out of receiving transactional e-mails related to their Account.

6.3 *Prior Information.* You can add or update certain information in areas such as those listed in the “User Access to Information” section above. You may discontinue your registration or close your Account at any time. Please note that after you close an Account, you will not be able to sign in or access your online order and/or payment history or any of your Personal Contact Information. However, you can re-register or open a new Account at any time. The Company may retain certain information associated with your registration or Account for analytical purposes as well as for recordkeeping integrity.

## **7. CHILDREN**

7.1 *General.* We sell products only for purchase by adults. We do not sell children's products. If you are under the age of 18, you may not use any Site.

## **8. CONDITIONS OF USE, NOTICES, AND CHANGES**

8.1 *Acceptance of Conditions of Use.* By visiting any Site, you accept that your visit and any dispute over privacy is subject to this Policy and Schletter's Conditions of Use, including limitations on damages, resolution of disputes, and application of the laws of the State of Arizona. If you have any concern about privacy at the Site, please e-mail us using our Contact Form.

8.2 *Changes.* Schletter reserves the right to change this Policy periodically and without prior notice to you to reflect changes in our personal information practices or relevant laws. The Company will provide notification of material changes to this Policy through the Company's Sites and indicate at the top of the Policy when it was updated.

## **9. YOUR CALIFORNIA PRIVACY RIGHTS**

9.1 *General.* California Civil Code § 1798.83 permits our Visitors and Customers who are California residents to request certain information regarding their disclosure of personal information to third parties for direct marketing purposes. To make such a request, please e-mail us using our Contact Form or write us at:

Schletter NA Inc.

1001 Commerce Center Drive

Shelby, North Carolina 28150

