

## Privacy Notice

**Last Updated: December 8, 2020**

SSA Group, LLC (“we,” “us,” or “our”) respects your privacy. This Privacy Notice explains how we, and our affiliates, collect, use, disclose, and protect Personal Information (defined below), and your choices about the collection and use of Personal Information.

This Privacy Notice applies to Personal Information collected or processed through any of our websites, apps, social media pages, or other platforms that link to this Privacy Notice (collectively, the “Site”).

### **1. Types of Personal Information We Collect and Use**

“**Personal Information**” is information that identifies or relates to a particular individual. Examples of Personal Information include, among others, name, email address, phone number, mailing address, and online identifiers.

As described in more detail below, we collect Personal Information from you in two ways – when you voluntarily submit Personal Information through a form on the Site; and through information we automatically collect when you use the Site.

#### **A. Information that You Provide Us**

In various places on the Site, we request information from you via forms. The exact Personal Information we need to collect will depend on the purpose of the form.

For example, if you register for an account, we request contact information, including your full name, email address, and phone number.

We will indicate on the form whether a particular field of Personal Information is mandatory or optional. If you choose not to provide certain Personal Information, we may not be able to provide requested services.

#### **B. Information We Automatically Collect from You**

We collect the following types of information automatically through your use of the Site:

- **Cookies, Device Identifiers, and Similar technologies**

When you use or access the Site, we and our service providers use cookies, device identifiers, and similar technologies such as pixels, web beacons, and local storage to collect information about how you use the Site. We process the information collected through such technologies, which may include or be combined with Personal Information, to help operate certain features of the Site, to enhance your experience through personalization, and to help us better understand the features of the Site that you and other users are most interested in.

Most browsers provide you with the ability to block, delete, or disable cookies, and your mobile device may allow you to disable transmission of unique identifiers and location data. If you choose to reject cookies or block device identifiers, some features of the Site may not be available or some functionality may be limited or unavailable. Please review the help pages of your browser or mobile device for assistance with changing your settings.

Some of our service providers may use cookies or other methods to gather information regarding your use of the Site, and may combine the information in these cookies with any Personal Information about you that they may have. The use of such tracking information by a third party depends on the Privacy Notice of that third party. We do not respond to Do Not Track (“DNT”) signals sent to us by your browser at this time. To learn more about how DNT works, please visit <http://allaboutdnt.com/>.

Here is a list of cookies that we use. We’ve listed them here so you can choose whether to accept them or not. Additional information regarding these cookies (including expiration date) may be available through your browser.

Type of Cookies	Description
<p><b>Required Cookies</b></p>	<p>Required cookies enable you to navigate our websites and use certain features, such as accessing secure areas and to keep track of certain information as you navigate from page to page. If you disable these cookies, our websites will not function properly.</p>
<p><b>Performance cookies</b></p>	<p>These cookies collect information about how you use our Site, including which pages you go to most often and if they receive error messages from certain pages. We use these cookies to improve how our Site functions and performs.</p> <p>Examples of performance cookies include:</p> <ul style="list-style-type: none"> <li>• Google Analytics cookies (_ga, _gid, _gat).</li> </ul>
<p><b>Tracking or Advertising Cookies</b></p>	<p>From time-to-time, we engage third parties that track individuals who visit our websites. For example, we and third-party service providers and advertisers use cookies to track the performance of our advertisements.</p> <p>Examples of tracking and advertising cookies include:</p> <ul style="list-style-type: none"> <li>• Facebook (_fbp) and Criteo (cto_bundle)</li> </ul>

- **Analytics**

To assist us with analyzing our website traffic through cookies and similar technologies, we use analytics services, including Google Analytics. For more information on Google Analytics’s processing of your information, please see [“How Google uses data when you use our partners' sites or apps.”](#) You can also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>.

- **Advertising**

We may engage third parties, including social media platforms, who use cookies, pixel tags, and other storage technologies to collect or receive information from our website and elsewhere on the internet to provide marketing services to us, including targeted advertising. If you want to learn more, including how you may opt-out of targeted advertising, you should visit the following sites:

- <https://www.aboutads.info/choices/>;

- <https://www.networkadvertising.org>;
- <https://www.youradchoices.com>;
- <https://www.facebook.com/settings/?tab=ads> (Facebook and Instagram);
- <https://www.google.com/settings/ads/anonymous> (Google); and
- <https://advertise.bingads.microsoft.com/en-us/resources/policies/personalized-ads> (Bing).

We do not operate or control these third party sites, and there may be additional ways for you to opt out of online advertising. Please note that by opting out, you will continue to see ads, but ads may not be as relevant to your interests.

- **Log File Information**

When you use our Site, our servers automatically record information, including your Internet Protocol address (“**IP Address**”), browser type, referring URLs (*e.g.*, the site you visited before coming to our Site), domain names associated with your internet service provider, information on your interaction with the Site, and other such information (collectively, “**Log File Information**”). We may also collect similar information from emails sent to you which then help us track which emails are opened and which links are clicked by recipients.

We use Log File Information collected from our implementation of the Site to help secure the Site by identifying potential threats and vulnerabilities and in analyzing the effectiveness of our Site to improve the Site’s function and content.

## 2. How We Use Personal Information

We use Personal Information the following purposes:

- Responding to your inquiries and customer service requests;
- Making our Site available to you;
- Analyzing, administering, and improving the Site;
- Enabling secure use of the Site and preventing fraud;
- Sending information and promotional materials (*e.g.*, newsletters and service updates);
- Protecting our rights or our property;
- Meeting legal obligations; and
- For other purposes related to the reasons for which you provide Personal Information.

We will retain your Personal Information for the period necessary to fulfill the purposes for which your Personal Information has been collected as outlined in this Privacy Notice unless a longer retention period is required by law.

## 3. Disclosure of Personal Information

We will not disclose Personal Information except as set forth in this Privacy Notice or with your consent. This section describes to whom we disclose Personal Information and for what purposes.

- **Affiliates.** We disclose Personal Information with our affiliated businesses. Our affiliated business may use Personal Information in accordance with this Privacy Notice, including for those affiliates’ marketing purposes.

- **Our Service Providers.** We engage service providers to perform tasks on our behalf and to assist us in operating the Site or providing our products and services. For example, we engage third parties to provide analytics services, advertising, payment processing, shipping, and Site and ecommerce functionality. We take commercially reasonable steps to help ensure our service providers provide at least the same level of protection for Personal Information as we do.
- **Audience Development.** Some of our service providers may temporarily process Personal Information on our behalf for the purpose of helping us reach new audiences. When we engage them to do so, we take steps to help minimize the use of Personal Information—such as converting information on our end into a cryptographic hash, then providing only the hash to a service provider. The service provider is then only able to correlate the hash with information already in its possession to help us reach out to people with similar interests as our current audience.
- **Companies Involved in Mergers and Acquisitions Transactions.** If we sell or otherwise transfer part or the whole of our business or assets to another organization (*e.g.*, in the course of a transaction like a merger, acquisition, bankruptcy, dissolution, or liquidation), any information collected through the Site, including Personal Information, may be among the items sold or transferred.
- **Law Enforcement, Government Agencies, and Courts.** We may disclose Personal Information at the request of law enforcement or government agencies; in response to subpoenas, court orders, or other legal process; to establish, protect, or exercise our rights; to defend against a legal claim; to protect the rights, property, or safety of any other person; or as otherwise required by law.

#### 4. How We Protect the Confidentiality of Personal Information

We use our commercially reasonable efforts to protect the confidentiality and security of Personal Information we process.

When you are paying for a product or service on our Site, your payment is processed only by a third party payment processor that specializes in secure online payment processing. We do not collect, store, or otherwise have access to your payment information. The payment processor keeps your payment information confidential, and we only receive a “token” to confirm your payment was completed.

Despite these efforts to store Personal Information in a secure operating environment, we cannot guarantee the security of Personal Information during its transmission or its storage on our systems. Further, while we attempt to ensure the integrity and security of Personal Information, we cannot guarantee that our security measures will prevent third parties such as hackers from illegally obtaining access to Personal Information. We do not represent or warrant that Personal Information about you will be protected against, loss, misuse, or alteration by third parties.

#### 5. Accessing, Updating, or Deleting Personal Information

If you have an account with us, you have the ability to update or remove certain Personal Information associated with your account at any time through the My Account page. If you would otherwise like to otherwise access, update, or delete Personal Information about you, you may submit a request using the contact information in Section 12, below. We will promptly review all such requests in accordance with applicable law.

If you are a resident of California, please see the information below in Section 8 (California Residents) for more information regarding your rights.

## **6. Opting Out of Receiving Electronic Communications**

We may send notifications, promotions, or other information via email or text message (“**Communications**”). You may choose to stop receiving Communications by indicating your preference in your account profile or settings, or by clicking on the unsubscribe link at the bottom of our emails. Please note that certain Site-related Communications are necessary for the proper functioning and use of the Site (*e.g.*, to send you emails confirming your purchase) and you may not have the ability to opt out of those Communications.

## **7. International Use of the Site**

If you are using our websites from outside the United States, please be aware that Personal Information will be collected, stored, and processed in the United States. Please be aware that the data protection laws of the United States might not be as comprehensive as those in your country.

## **8. Children’s Privacy**

We do not knowingly collect or solicit any Personal Information from children. In the event that we learn that we have collected Personal Information from a child, we will promptly take steps to delete that information.

## **9. Other Websites and Sites, Including Social Media**

We are not responsible for the practices employed by any websites or services linked to or from our Site, including the information or content contained within them. A link to a third party’s website should not be construed as an endorsement. We encourage you to investigate and ask questions before disclosing Personal Information to third parties.

## **10. Changes to Our Privacy Notice**

We may modify or update this Privacy Notice from time to time, so please review it periodically. We may provide you with notice of material changes to the Privacy Notice as appropriate under the circumstances. Unless otherwise indicated, any changes to this Privacy Notice will apply immediately upon posting to the Site.

## **11. Your Rights**

Depending on your relationship with us, certain rights may apply with respect to your personal data. Please contact us using the information in Section 12 for more information about your rights, and how to exercise them.

## **12. How to Contact Us**

If you have any questions about this Privacy Notice or the Site, contact us at the support email address found on the online store website.

### 13. California Residents

This section applies to our collection and use of “**Personal Information**” if you are a resident of California, as required by the California Consumer Privacy Act of 2018 and its implementing regulations (the “**CCPA**”). When we use the term “**Personal Information**” in the context of the CCPA, we mean information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California consumer or household. Please note that the CCPA is experiencing further changes as part of the rulemaking activity process. As a result, please check back often as this Section may change to comply with future CCPA requirements.

If you would like to receive a copy of this Section in an alternate format (e.g., printable) or language, please contact us using the information provided in Section 12 above.

#### A. Categories of Personal Information Collected, Used, and Disclosed

In accordance with California law, we collected and disclosed the following categories of Personal Information within the past 12 months:

<b>Categories of Personal Information Collected &amp; Disclosed</b>
<b>Identifiers</b> - A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.
<b>Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))</b> - A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.
<b>Protected classification characteristics under California or federal law</b> - Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).
<b>Internet or other similar network activity</b> - Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
<b>Geolocation data</b> - Physical location or movements.
<b>Professional or employment-related information</b> - Current or past job history or performance evaluations.
<b>Inferences drawn from other personal information</b> - Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

We disclose each of these categories of Personal Information to our service providers to the extent necessary for them to facilitate our business purposes (including any purpose specified in Section 2, above). Additionally, some of our online advertisers may have used and disclosed Usage Information collected automatically from the Service. Regardless of whether this a “sale” of Personal Information as defined by California law, we provide you the right to opt out of cookies used for online behavioral advertising as described in Section 1(B), above.

In the last 12 months, we do not have knowledge that we sold any Personal Information of California Consumers, nor actual knowledge that we sold the Personal Information of California Consumers under the age of 16 years old. The CCPA defines “sale” as: selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s Personal Information to another business or third party for monetary or valuable consideration.

If we do sell your Personal Information, we will notify you, and if you submit to us a verifiable consumer request using the contact information in Section 7 below, we will disclose to you a list containing the categories of Personal Information that we sold in accordance with the CCPA’s requirements.

## **B. Your California Privacy Rights**

If you are a resident of California, you have the following rights:

- **Right to Know.** You may have the right to request information on the categories of personal information that we collected in the previous twelve (12) months, the categories of sources from which the Personal Information was collected, the specific pieces of Personal Information we have collected about you, and the business purposes for which such personal information is collected and shared. You also have the right to request information on the categories of Personal Information which were disclosed for business purposes, and the categories of third parties in the twelve (12) months preceding your request for your personal information.
- **Right to Delete.** You may have a right to request us to delete Personal Information that we collected from you.

If you would like to exercise your rights listed above, please contact (or have your authorized agent contact) us at the contact information provided in Section 12, above. When doing so, please tell us which right you are exercising and provide us with contact information to direct our response.

We must verify your identity before fulfilling your requests. If we cannot initially verify your identity, we may request additional information to complete the verification process. Any Personal Information you disclose to us for purposes of verifying your identity will solely be used for the purpose of verification.

We may deny certain requests, or only fulfill some in part, as permitted or required by law. For example, if you request to delete Personal Information, we may retain Personal Information that we need to retain for legal purposes (*e.g.*, tax accounting). You have a right not to receive discriminatory treatment by any business when you exercise your California privacy rights.

The CCPA gives California Consumers the right to lodge a complaint with the California Attorney General’s office. The Attorney General’s office may be contacted at <https://oag.ca.gov/contact/consumer-complaint-against-business-or-company> or by telephone at: (916) 210-6276.