

## Privacy Statement

Effective: May 25, 2018

This privacy statement governs how William Frick & Company, its subsidiaries and affiliates, collect and process data including personal data about you. Personal Data is data that directly or indirectly identifies you. The purpose of this statement is to provide increased transparency to you regarding how your personal data is processed, and to ensure that you have choices regarding how your data is collected and stored.

### **Collected Data**

#### **All website visitors**

Collected data includes an IP Address and associated information including ISP/Company and location information. Additional information is collected including date/timestamp, all pages visited, how you came to our website, what type of device was used, browser and screen resolution. This data is collected via tracking cookies.

If you have never submitted a form your information remains identifiable only by IP address.

If you have submitted a form your IP address can be used to identify you.

#### **After you submit a form**

The collected data varies for each form as not all forms require the same information. Information collected may include IP address, mailing and/or billing address, name, company, email address, order information, phone number and information about products you are inquiring about or additional notes relating to your inquiry submitted in the form.

### **Disclosure of Personal Data**

We may disclose Personal Data to:

- Our third party service providers to facilitate services they provide to us. These services can include providers of services such as website hosting, data analysis, payment processing, order fulfillment, information technology and related infrastructure provision, customer service, email delivery, auditing, and other services; and third party payment processors. When required by applicable law, we will enter into contractual agreements with such providers.

### **Other Uses and Disclosures**

We may also use and disclose Personal Data as we believe to be necessary or appropriate to do so:

- to comply with applicable law including treaties or agreements with or between foreign or domestic governments (including in relation to tax reporting laws), which may include laws outside the country you are located in;

- to respond to requests from public and government authorities, which may include authorities outside your country;
- to cooperate with law enforcement, governmental, regulatory, or other similar agencies or authorities to which we or our affiliates are subject or submit;
- to courts, litigation counterparties and others, pursuant to subpoena or other court order or process or otherwise as reasonably necessary, including in the context of litigation, arbitration and similar proceedings to enforce our terms and conditions, and as reasonably necessary to prepare for or conduct any litigation, arbitration and/or similar proceedings; and
- to enforce our terms and conditions and protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.

In addition, we may use, disclose or transfer Personal Data to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings). Such third parties may include, for example, an acquiring entity and its advisors.

### **Collection of Other Information**

We and our service providers may collect Other Information in a variety of ways, including:

- Through a browser or device: Certain information is collected by most browsers or automatically through devices, such as a Media Access Control (MAC) address, computer type (Windows or Mac), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version and the name and version of the Services (such as the App) being used. We use this information to ensure that the Services function properly;
- Using cookies: Cookies are pieces of information stored directly on the computer being used. Cookies allow us to collect information such as browser type, time spent on the Services, pages visited, language preferences, and other anonymous traffic data. We and our service providers use the information for security purposes, to facilitate navigation, to display information more effectively, and to personalize the user's experience. We also gather statistical information about use of the Services in order to continually improve their design and functionality, understand how they are used and assist us with resolving questions regarding them. We do not currently respond to browser do-not-track signals;
- Most browsers allow individuals to automatically decline cookies or be given the choice of declining or accepting a particular cookie (or cookies) from a particular website. Please refer to <http://www.allaboutcookies.org/manage-cookies/index.html> for more information. Declining cookies may cause certain parts of the Services to cease working;
- Using pixel tags and other similar technologies: Pixel tags (also known as web beacons and clear GIFs) may be used to, among other things, track the actions of users of the Services (including email recipients), measure the success of our marketing campaigns and compile statistics about usage of the Services and response rates; and
- Analytics: We may use Google Analytics, which uses cookies and similar technologies to collect and analyze information about use of the Services and report on activities and trends. This service may also collect information regarding the use of other websites, apps and online

resources. You can learn about Google's practices by going to <https://policies.google.com/technologies/partner-sites> We may use Flash LSOs and other technologies to, among other things, collect and store information about your use of the Services. If you do not want Flash LSOs stored on your computer, you can adjust the settings of your Flash player to block Flash LSO storage using the tools contained in the Website Storage Settings Panel. You can also go to the Global Storage Settings Panel and follow the instructions (which may explain, for example, how to delete existing Flash LSOs (referred to as "information"), how to prevent Flash LSOs from being placed on your computer without your being asked, and how to block Flash LSOs that are not being delivered by the operator of the page you are on at the time). Please note that setting the Flash Player to restrict or limit acceptance of Flash LSOs may reduce or impede the functionality of some Flash applications.

### **Uses and Disclosures of Other Information**

We may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. In some instances, we may combine Other Information with Personal Data. If we do, we will treat the combined information as Personal Data as long as it is combined.

Certain links may contain content provided by third parties. Those third parties may collect information about your website usage, including information specific to your mobile device or computer (e.g., IP address) when pages are served to your web browser. Further, when you click on a third party link from the Sites and mobile applications (including, without limitation, banner advertisements), that link will take you to a website(s) controlled and operated by third parties that we do not control. When you click on a third party link, you will be subject to that third party's terms and privacy policy. Please review the privacy policy of all third party websites that you contact prior to sharing your personal information with such websites.

Third Party Advertisements and/or Analytics: We may serve third party advertisements and may use third party analytics service providers to provide us with statistical information. These third parties display advertisement banners based on an analytics of the statistical data regarding your visits to the Sites or mobile applications in order to tailor advertisements that may interest you. These third parties typically install cookies or other tracking technologies to monitor and record certain behavioral statistics that assist with targeted advertising practices. This Privacy Policy does not cover the methodologies used by third parties. Please review the privacy policy of all third party websites that you contact prior to sharing your personal information with such websites. We are not responsible for the content or practices of any third party advertiser.

### **Security**

We seek to use reasonable organizational, technical and administrative measures to protect Personal Data within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure please immediately notify us in accordance with the "Contacting Us" section below.

### **Retention Period**

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

### **Information About GDPR Compliance**

Certain of the Personal Data provided by you through the use of the Site may be governed the General Data Protection Regulation (“GDPR”). The following information concerns compliance with this new regulation.

### **Effective Date of GDPR**

GDPR is set to take effect on May 25, 2018. On and after that date, we will comply with GDPR to the extent applicable.

### **Bases for the Processing of Data**

Where you have entered into an agreement with us, or purchased a good or service from us, we require this data as a condition of the contract between you and the Controller. In other circumstances, we may process data because it has a legitimate interest in marketing or apprising you of offers or services, or because you have consented to receive such offers and services.

### **Your Rights Under GDPR**

If the GDPR applies to retention of your Personal Data, you have several rights including (i) the right to request access, rectification or erasure of your data, (ii) the right to lodge a complaint with the appropriate European Union supervisory authority, and (iii) to the extent processing of data is based on consent, you have the right to withdraw your consent at any time.

### **Consent and Withdrawal**

To the extent we seek your consent for the processing of Personal Data, you may withdraw your consent at any time by [clicking unsubscribe] or contacting us at the location below.

### **Jurisdiction and Cross-Border Transfer**

Personal Data may be stored and processed in any country where we have facilities or in which we engage service providers, including the United States, and by using the Services you understand that your information will be transferred to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies or regulatory agencies in those countries may be entitled to access Personal Data.

### **Additional Information Regarding the EEA**

Some of the non-EEA countries are recognized by the European Commission as providing an adequate level of data protection according to EEA standards (the full list of these countries is available here: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en)). For transfers from the EEA to countries not considered adequate by the European Commission, we have put in place adequate measures, such as the standard contractual clauses adopted by the European Commission to protect your Personal Data. You may obtain a copy of these measures by following this link: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en).

### **Contact Information**

Should you have any questions or require any additional information, please contact [gdpr@fricknet.com](mailto:gdpr@fricknet.com).

### **Updates to this policy**

Updates to this policy will be communicated via email if there is a valid email address on file and can be found on [www.smartcatrfid.com](http://www.smartcatrfid.com).