

## PRIVACY POLICY

Last modified: November 5, 2019

Hart Consumer Products, Inc. and its affiliates <link> (“Company” or “we” or “our” or “us”) respects your privacy. As detailed further below, this policy applies to this site or app (collectively “Services”) and is intended for our customers and visitors from the United States, Canada, and Mexico. Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, you may not use our Services. By accessing or using our Services, you agree to this privacy policy.

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*What information do we collect about you and how we collect it?*

If you register an account with us, we collect several types of information from and about you, including information:

- you voluntarily provide us, including when you set up your account and through surveys, such as:
  - name,
  - screen name,
  - avatar,
  - postal address,
  - e-mail address,
  - telephone number,
  - FAX number,
  - billing address,
  - shipping address,
  - password,
  - income,
  - dwelling type,
  - occupation,

- preferences,
- experience level,
- language preference,
- opt-in to marketing,
- opt-in to research and surveys,
- opt-in to retailer/affiliate promotions,
- interests,
- product wishlist,
- project name,
- project description,
- your skill level for the project,
- hours for the project,
- project tools,
- project materials,
- project images,
- project video,
- project categories,
- “inspired by,”
- Instagram handle,
- user-generated content,
- video files,
- contest and sweepstakes entries, and
- opinions.

(“personal information”);

- that is about you but individually does not identify you, such as
  - gender,
  - marital status,
  - birth date;
  - recipes,
  - name of dish,
  - preparation time for dish,
  - grilling time for dish,
  - difficulty of recipe,
  - image of dish,
  - ingredients for recipe, and

- preparation instructions
- about which of our products that you own such as
  - product model numbers,
  - purchase receipt code,
  - online order number,
  - date of purchase,
  - date of warranty registration,
  - serial numbers and
  - purchase location;

Even if you are visiting, or if you have registered with us, we will collect some information about the technologies used to arrive at our Services and usage of them:

- internet connection,
- browser,
- IP address,
- operating system,
- any files you download or view,
- your path to and through our Services,
- the date,
- time and frequency you spend accessing our Services
- length of time you spend reviewing certain features;
- your actual physical location using various technologies to determine location, including IP address

System-related information for our registered users:

- authentication token,
- customer identifier,
- “Remember me” token,
- agreement to Terms of Use and Privacy Policy,
- list of applications you have downloaded from our Services, and
- battery tracking location

*What are our sources for this information?*

We collect this information:

- Directly from you when you provide it to us;

- From our systems, such as the date and time you create your account
- From third parties that provide analytics and other marketing services, such as
  - Google Analytics,
  - CMS statistics,
  - Facebook,
  - Mailchimp,
  - Bazaarvoice,
  - Pricespider,
  - TV Squared,
  - Twinesocial,
  - Walmart,
  - Winesocia, and
  - Other third parties, from time to time

We may combine the information we receive from those other sources with information we collect from you. In those cases, we will apply this Privacy Policy to the combined information.

For the purpose of enabling better design and a better user experience, we employ Google Analytics (a web service by Google, Inc.) to track site traffic and provide aggregate reports of how the public interacts with our Services. Session cookies are employed by Google Analytics in the form of client-side JavaScript code. In utilizing this analytics service, ABC maintains its existing standards in regards to the sharing and disclosure of information, security and privacy safeguards for the data, and the data retention policy, each described below. Google Analytics analyzes website usage information automatically upon visits to the our Services. Users who do not wish to have their visit information collected by Google Analytics may opt-out by downloading a browser extension or by disabling cookies in their browser settings. Opting-out of web measurements will still permit users to access the full Services, with all included information and functionality.

- Automatically as you navigate through the Services.
  - usage details,
  - IP addresses,
  - unique identifier for any computer, mobile phone, tablet or other device used to access the Site, which identifier is a number that is automatically assigned to your device. Some mobile service providers may also provide us or our third party service providers with information regarding the physical location of the device used to access the Site.
  - cookies,
  - web beacons, and
  - other tracking technologies.

#### *How do you collect data automatically?*

Like many websites, we typically use a variety of tools to collect data automatically, including cookies, Flash cookies, web beacons, and embedded scripts:

- Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Services.
- Flash Cookies. Certain features of our Services may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Services. Flash cookies are not managed by the same browser settings as are used for browser cookies.
- Web Beacons. Our Services may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, web bugs, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics.
- Embedded Scripts. An embedded script is programming code that is designed to collect information about your interactions with the Services, such as the links you click on. The code is temporarily downloaded onto your device from our web server or a third party service provider, is active only while you are connected to the Services, and is deactivated or deleted thereafter.

We do not collect personal information automatically, but we may tie this information to personal information about you that we collect from other sources or you provide to us.

*How do we use your information?*

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Services to you.
- To provide you with information or services that you request from us.
- To provide you with information about our goods and services that may be of interest to you.
- To fulfill any other purpose for which you provide it.
- To personalize Services for you,
- To provide store locator information,
- To determine applicable warranty information,
- To conduct our internal administration and auditing functions,
- To check for fraud,
- To inform you about, and to facilitate, product recalls,
- To open and service your account;
- To determine whether you opened our emails,
- To aggregate with other data to better understand purchasing patterns and customer personas,
- To carry out our rights arising from any contracts entered into between you and us,
- To operate, evaluate, or improve the Services and our business and our affiliates' businesses (including developing new products and services; and determining the effectiveness of and optimizing our advertising),

- To anonymize personal information and prepare and furnish aggregated data reports showing anonymized information for our and our affiliates' business purposes, including to analyze or predict trends,
- To contact you with regard to your use of the Services, and, in our discretion, changes to the site policies or functionality,
- To manage risk exposure and enforce legal and contractual obligations,
- As may be required by applicable laws and regulations or as requested by any judicial process or governmental agency having or claiming jurisdiction over us or an affiliate,
- To comply with industry standards and our policies,
- To process job applications,
- In any other way we may describe when you provide the information, and
- For any other purpose with your consent.

*When and how do we disclose your information?*

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To third party service providers that perform services on our behalf, including without limitation, those that host and operate the Services,
- To our affiliates, contractors, service providers, and other third parties to support our business or for their own marketing purposes,
- To our IT staff to help with system issues,
- To warranty management personnel to help with warranty questions and issues,
- To authorized service centers to provide repairs and other services,
- To customer service employees at the retailer where you purchased the product(s), if applicable,
- To order management service providers,
- To product registration agents,
- To advertisers and analytics services,
- To our auditors,
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our Services users is among the assets transferred,
- To fulfill the purpose for which you provide it,
- For any other purpose disclosed by us when you provide the information, and

- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request,
- To enforce or apply our terms of use and other agreements, and
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

*How do we secure your information?*

- We have undertaken and will undertake commercially reasonable efforts, using various administrative, physical and technical measures designed to prevent unauthorized access to user data retained in our servers,
- We use no encryption (data scrambling) on certain portions of the Services, but use encryption on portions where you are transmitting financial information, such as credit card information,
- Due to the inherent open nature of the Internet, we cannot ensure or warrant the security of any information provided online, and
- Keep in mind there is no such thing as perfect security.

*How long do we retain your information?*

- We will retain your information for as long as your account or inquiry is active or as needed to provide you with the Services and for a reasonable time thereafter in accordance with our standard procedures or as necessary to comply with our legal obligations, to resolve disputes, and to enforce our agreements,
- Even if we delete some or all of your personal information, we may continue to retain and use aggregate or anonymous data previously collected and/or anonymize or aggregate your personal information, and
- Please note that we will not be liable for disclosures of your data due to errors or unauthorized acts of third parties.

*What are your choices about how we use and disclose your information and how do you opt-out?*

- At the time when you provide personal information to us, or when you register for an account to use the Services, you agree that we can communicate with you electronically regarding your use of the Services.
- However, we strive to provide you with choices regarding the personal information you provide to us.
- We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies.**
  - You can set your browser to **refuse** all or some browser cookies, or to **alert** you when cookies are being sent.
  - If you disable or refuse cookies, please note that some parts of the Services may then be inaccessible or not function properly. Cookie-based opt-outs are NOT effective on many mobile devices. However, on many mobile devices, application users may opt out of certain mobile ads via their device settings.
  - Please note that not all tracking will stop even if you delete cookies.
- Targeted Advertising
  - Even if you opt-out of cookies, we may work with third parties, to use non-personal information to delivery targeted advertisements to you based upon your online activities and other information.
  - The online advertising industry provides a service through which you may opt-out of receiving targeted ads from certain data partners and other advertising partners that participate in self-regulatory programs. You can learn more here < <http://optout.networkadvertising.org/?c=1>> (or If you would like additional information about online tracking and various opt-out mechanisms, please see <http://donottrack.us/> )
  - In addition, we use Google AdWords, so we are advertising the Site online through a form of tracking called remarketing, Third-party vendors, including Google, show our ads on various sites across the Internet, and use cookies to serve you ads based on your past visits to this Site. You can opt out of Google's use of cookies by visiting Google's Ads Settings <https://www.google.com/settings/ads/plugin> . Alternatively, you can opt out of a third-party vendor's use of cookies by visiting the Network Advertising Initiative opt-out page. <http://www.networkadvertising.org/choices/>.
  - Please note that by opting out, you will continue to see generic advertising that is not tailored to your specific interests and activities. To be clear, cookie-based opt-outs must be performed on each device and browser that you wish to have opted-out. For example, if you have opted out on your device browser, that opt-out will not be effective on your mobile device. You must separately opt out on each device.

- **Email Communications.**

- If you do not want to receive emails from us regarding special offers or about our products and services, you can unsubscribe from this service using the unsubscribe option provided in the email or contact us at [address below]. We will process your request within a reasonable time after receipt.
- Even if you opt out of marketing emails, we will still send you emails regarding your products if you registered your product, such as warranty and safety information, and emails in response to your communications to us or related to the purpose for which you supplied us with your email address.



- We are not responsible for removing your personal information from the lists of any third party who has previously been provided with your information in accordance with this Privacy Policy or your consent. Please note that if you opt out in this manner, certain aspects of the Services may no longer be available to you.
- **Do Not Track.** We do not track you over time and movement across third party websites to provide targeted advertising and therefore we do not respond to Do Not Track (DNT) signals.

*How do you remove or correct your personal information?*

You may change or remove personal information stored in your account by logging into your account and modifying the information. If you wish to have us delete your personal information that you have provided to us, you may contact us using the information in the How to contact us? <link> section. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement.

*California Privacy*

Under California Law, California residents have the right to request in writing from businesses with whom they have an established business relationship, (a) a list of the categories of personal information, such as name, email address and mailing address and the type of services provided to the customer that a business has disclosed to third parties (including affiliates that are separate legal entities) during the immediately preceding calendar year for the third parties' direct marketing purposes and (b) the names and addresses of all such third parties. To request the above information, please contact us at [address below]. If you do not want your personal information shared with any third party who may use such information for direct marketing purposes, then you may opt out of such disclosures by sending a correspondence to [address below].

*What is excluded from this policy? **This policy does NOT apply to the following:***

- Any other websites, apps or services provided by us, our affiliates or clients, unless it appears on such website, app or service.
- Information collected offline or through third parties.
- Our Services may contain links to websites owned by other companies. We do not control or endorse and are not responsible for the privacy practices of other sites or third parties to whom you may link from our website. This policy is not intended to describe data handling procedures for information collected by other linked websites or business partners.
- When you use some applications or post on a social networking service, the personal information and content you share is visible to other users and can be read, collected, or used by them.
  - This visible content may include your name, email address, photo, gender, birthday, location, an ID associated with the third party platform or social media account user files, like photos and videos, your list of friends or connections, people you follow and/or who follow you, or your posts or "likes."
  - You are responsible for the personal information you choose to share or submit in these instances.

- Check the social media service for a description on how social media services and other third party platforms, plug-ins, integrations or applications handle your information, and whether you can modify your privacy settings.
- **Children Under the Age of 13.**
  - Our Services are not intended for children under 13 years of age. If you are under 13, do not use our Services or provide any information to or through our Services.
  - No one under age 13 should provide any personal information to or through any of the Services.
  - We do not knowingly collect personal information from children under 13. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information.
  - If you believe we might have any information from or about a child under 13, please contact us using the contact information in the Contact Information section below harttools.com.
- **Users Outside of the U.S.** If you live outside the United States and Canada and Mexico (including , the European Economic Area), please find our Services through our sister Websites in various countries. For a list of our foreign sites, [please click here](#) If you are situated outside the United States and provide us with personal information through our U.S. Services, such information will be handled in accordance with this policy. **THE SITES ARE GOVERNED BY AND OPERATED IN ACCORDANCE WITH UNITED STATES LAW. BY USING OUR SERVICES OR GIVING US YOUR PERSONAL INFORMATION, YOU ARE DIRECTLY TRANSFERRING YOUR PERSONAL INFORMATION AND OTHER INFORMATION TO US IN THE UNITED STATES WHERE OUR CENTRAL DATABASE OPERATES. BY USING OUR SERVICES, YOU ACKNOWLEDGE THAT THE UNITED STATES MAY NOT HAVE THE SAME LEVEL OF DATA PROTECTION AS YOUR JURISDICTION AND YOU AGREE AND EXPLICITLY CONSENT TO YOUR PERSONAL INFORMATION BEING COLLECTED, PROCESSED AND TRANSFERRED IN ACCORDANCE WITH THIS PRIVACY POLICY AND SUBJECT TO UNITED STATES LAWS.** You are solely responsible for compliance with any data protection or privacy obligations in your jurisdiction when you use the Services, or provide us with personal information. Regardless of where we transfer your information, we still protect your information in the manner described in this policy.

*Will this privacy policy change?*

The date the privacy policy was last revised is identified at the top of the page. This privacy policy may change from time-to-time. It is our policy to post any changes we make to our privacy policy on this page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our privacy policy to check for any changes.

*Additional rights*

Applicable laws may give you additional rights that are not described in this online privacy policy.

*How to contact us?*

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

Hart Consumer Products, Inc.  
Attention: LEGAL DEPARTMENT  
100 Innovation Way  
Anderson, South Carolina 29621