

H. KRAMER & CO. PRIVACY POLICY

Effective Date: April 5, 2022

Introduction and Scope

H. Kramer & Co. (“**Kramer**”, “**we**”, “**us**” or “**our**”) respects the privacy of our website visitors and customers (referred to as “**you**” or “**your**”). This privacy policy (“**Privacy Policy**”) (and as amended from time to time as posted on our website [here](#)) describes the types of information we collect from you or that you may provide when you visit or use our hkramer.com website (“**Website**”) or purchase our products (“**Products**”), and our practices for collecting, using, maintaining, protecting, disclosing, retaining, and transferring that information. By “visitors” we mean visitors to our Website who are not yet customers, those who become customers, as well as those who do not become customers, and, whether you upload information to our Website, download it, or are merely visiting our Website. This Privacy Policy applies to you as applicable to the category to which you belong. This Privacy Policy applies to the data collected by us, or those working on our behalf, through information you enter or from the data imported from authorized and approved sources.

Acknowledgement and Consent

By visiting our Website or purchasing our Products in any manner, you acknowledge that you accept the terms, practices and policies described in this Privacy Policy (and as updated from time to time), and you hereby consent that we may collect, use, and share your information as described herein. If you do not agree with our policies and practices, your choice is not to use our Website. Your use of the Website is at all times subject to our Terms of Use (available [here](#)) and as updated from time to time (the “**Terms**”), which is incorporated by reference herein. Any capitalized terms we use in this Privacy Policy without defining them have the definitions given to them in the Terms.

What Information Does This Privacy Policy Cover?

This Privacy Policy covers our treatment of personally identifiable information. “**Personal Information**” means any unencrypted or non-deidentified information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked with a particular person such as, but not limited to, your name, mailing address, email address, telephone number, etc. Please see additional information below entitled “Personal Information We Collect” for the particular information we may collect.

For this Privacy Policy the definition of “Personal Information” is the definition under the state, country, or other law applicable to the person whose data is collected; however, for California residents only, “Personal Information” shall have the definition as set forth in the California Consumer Privacy Act of 2018 (“**CCPA**”). Please see the section below entitled “Privacy Notice for California Residents” for more information.

If you are a citizen or resident of the European Economic Area (“**EEA**”), United Kingdom, or Switzerland, the definition of personal information is defined under the General Data Protection Regulation (“**GDPR**”) and you have certain rights; therefore, please see the section below entitled “GDPR”

Personal Information does not include your Personal Information that has been deidentified, pseudonymized, anonymized, aggregated, and/or otherwise processed so as to be unidentifiable in such a way that the data can no longer be attributed to a specific individual (by reasonable means) without the use of additional information, and where such additional information is kept separate and under adequate security to prevent unauthorized re-identification of a specific individual such that one could not, using reasonable efforts, link such information back to a specific individual (collectively, all of the foregoing in this sentence being referred to as “**De-Identified Personal Information**”).

We may also collect Personal Information from you through means other than our Website. This may include offline collection, such as if you submit a paper application, make a payment by check, or call or visit our office. It may also include emails or other electronic communications that you send to us separate from our Website or by way of our third-party Service Providers (as defined below). However, if we combine the Personal Information we collect from you outside of our Website with Personal Information that is collected through our Website or by another means as described above, the Privacy Policy will apply to the combined information, unless specifically disclosed otherwise.

Other than as stated herein, this Privacy Policy does not apply to information collected by any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on our Website. We are not responsible for the practices of sites linked, and before interacting with any of these sites you are advised to review their rules and policies before providing them with any private information.

Individuals under the Age of 18

We do not knowingly collect, solicit or maintain Personal Information from anyone under the age of 18. If you are under 18, please do not send any Personal Information about yourself (such as your name, address, telephone number, or email address) to us. In the event that we learn that we have collected Personal Information from a child under age 18 without verification of parental consent, we will use commercially reasonable efforts to delete that information from our database. Please contact us if you have any concerns.

Changes to Our Privacy Policy

We are constantly working to improve our Website, and we may need to change this Privacy Policy from time to time as well. Our current Privacy Policy will always be on our Website and any updates will be effective upon posting. You are responsible for periodically checking our Website for updates.

If you use the Website or purchase Products after any changes to the Privacy Policy have been posted, you agree to the new Privacy Policy, including all of the changes. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is collected.

Personal Information We Collect

We collect several categories of Personal Information from and about you as set out below.

Category	Specific Items of Personal Information
Identifiers	<ul style="list-style-type: none"> • first and last name • email address • postal address • unique personal identifier, e.g.: phone number
Commercial Information	<ul style="list-style-type: none"> • products purchased
Internet or other electronic network activity	<ul style="list-style-type: none"> • browsing, session, interaction, and search history related to our Website • cookies • browser language and type • material and pages viewed • time and date of access to the Website • number of bytes transferred • number of clicks per visit • operating system and platform, device type and device identifiers • hypertext transfer protocol headers, application client and server banners, and operating system fingerprinting data • MAC address, device ID/UDID, or similar device-specific code

How We Collect Personal Information and from What Sources

Information You Provide Us. The Personal Information we and/or representatives and business partners may collect include the following:

- Information that you provide by filling in webforms on our Website. This includes purchasing our Products, requesting information from us, submitting or posting material (where permitted) on our forums, report a problem with our Website or Products, or otherwise communicating with us.
- Records and copies of your correspondence (including email addresses), if you contact us.

Information We Collect Through Automatic Data Collection Technologies. As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions and patterns, including details of your visits to our Website, including, but not limited to, traffic data, data, logs, and other communication data and the resources that you access and use on the Website.

Behavioral Tracking. We do not allow personalized third-party behavioral tracking, though we may use De-Identified Personal Information to track users' click or browsing patterns.

Cookie Notice/Policy. The technologies we use for this automatic data collection may include cookies, local storage cookies, GIF and/or IP address. Each of these is discussed below.

Cookies (or browser cookies)

A cookie is a small file placed on the hard drive of your computer or mobile device. It may contain certain data, including, but not limited to: the name of the server that has placed it there, an identifier in the form of a unique number, and, an expiration date (some cookies only). Cookies are managed by the web browser on your computer or mobile device (Internet Explorer, Firefox, Safari or Google Chrome).

Different types of cookies which have different purposes are used on our Website.

Essential Cookies

These cookies are essential to allow you to browse our Website and use its functions.

Performance Cookies

These cookies collect information on the use of our Website, such as which pages are consulted most often. This information enables us to optimize our Website and simplify browsing. These cookies do not collect any information which could be used to identify you. All the information collected is aggregated, and therefore anonymous.

Functionality Cookies

These cookies enable our Website to remember the choices you have made when browsing. For example, we can store your geographical location in a cookie so that the Website corresponding to your area is shown. The information collected by these cookies cannot be used to identify you and cannot monitor your browsing activity on sites which do not belong to us.

We also use cookies to implement tracking technology on our Website. This tracking uses De-Identified Personal Information.

At any time, you can prevent the use of cookies in the future. You may activate the appropriate setting in your browser to refuse to accept browser cookies. 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 Website.

Local Storage Cookies

Certain features of our Website may use local stored objects to collect and store information about your preferences and navigation to, from and on our Website. Local storage cookies are not managed by the same browser settings as are used for browser cookies.

IP Address. Our servers (or those of our service providers) automatically record certain log file information reported from your browser when you access the Website. These server logs may include information such as which pages of the Website you visited, your internet protocol (“IP”) address, browser type, and other information on how you interact with the Website. These log files are generally deleted periodically.

Information We Collect from Third Parties. We may collect information that others provide about you when you use the Website, or obtain information from other sources and combine that with information we collect through the Website. To the extent permitted by applicable law, we may receive additional information about you from third-party service providers and/or partners, and combine it with information we have about you.

Third-Party Use of Cookies and Other Tracking Technologies.

Google Analytics.

We use, and some of our third-party service providers may use, [Google Analytics](#) (click for link to Google's website) or other analytics service to help us understand use of our Website. Such service providers may place their own cookies in your browser. This Privacy Policy covers use of cookies by us only and not the use of cookies by third parties.

Google reCAPTCHA.

We use Google reCAPTCHA, which identifies bots by collecting hardware and software information and sending that data to Google for analysis. More about Google reCAPTCHA is available [here](#).

Users can set preferences for how Google advertises to you using the Google Ad Settings page. Alternatively, you can opt out by visiting the Network Advertising Initiative Opt Out page or by using the Google Analytics Opt Out Browser add-on.

How 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 Website and its contents to you and to provide you with information and respond to your questions on Products that you request from us. We use cookies to: (a) monitor the effectiveness of our Website and content, and (b) monitor aggregate metrics such as total number of visitors, traffic, and demographic patterns

How We Share Your Personal Information

We may or do disclose your Personal Information, in whole or in part, to the following types of third parties, and for one or more the following purposes:

- Data storage or hosting providers for the secure storage and transmission of your data
- Database and software service providers for the management and tracking of your data
- Technology providers who assist in the development and management of our Website
- Identity management providers for authentication purposes
- Legal and compliance consultants, such as external counsel, external auditors, or tax consultants

Disclosures to Service Providers. We may share your Personal Information with third parties for the purpose of providing or improving our Website and Products. We may share your Personal Information with third-party service providers which perform services on our behalf (“**Service Providers**”). If we engage Service Providers for any of the foregoing, use of your Personal Information will be bound by obligations of confidentiality and their use of Personal Information will be restricted to providing their services to us. We may store Personal Information in locations outside our direct control (for instance, on servers or databases located or co-located with hosting Service Providers).

Required Disclosures. Except as otherwise described in this Privacy Policy, we will not disclose your Personal Information to any third party unless required to do so by law, court order, legal process, or subpoena, including, but not limited to, in order to respond to any government, regulatory, or licensing request, or if we believe that such action is necessary to: (a) comply with the law, comply with legal process served on us or our affiliates, subsidiaries, contracted vendors,

or affinity partners, or investigate, prevent, or take action regarding suspected or actual illegal activities; (b) enforce our Terms or customer agreement (including for billing and collection purposes); (c) take precautions against liability; (d) investigate and defend ourselves against any third-party claims or allegations; (e) assist government enforcement agencies or to meet national security requirements; (f) to protect the security or integrity of our Website and our Products; or, (g) exercise or protect the rights, property, or personal safety of us, our users or others.

We will attempt to notify you about these requests unless: (i) providing notice is prohibited by the legal process itself, by court order we receive, or by applicable law, or (ii) we believe that providing notice would be futile, ineffective, create a risk of injury or bodily harm to an individual or group, or create or increase a risk of fraud upon us, our users, our Website. In instances where we comply with legal requests without notice for these reasons, we will attempt to notify that user about the request after the fact if we determine in good faith that we are no longer legally prohibited from doing so and that no risk scenarios described in this paragraph apply.

It is likely that the identity and categories of such third parties will change during the life of your account. We require that our third-party service providers only use your Personal Information as necessary to provide the requested services to us and each service provider is subject to a set of terms consistent with the applicable portions of this Privacy Policy.

SALE/DISCLOSURE OF PERSONAL INFORMATION

No Sale of Personal Information. We do not disclose or share your Personal Information with any third parties for which we receive any monetary or other valuable consideration. **In other words, we do not sell your Personal Information, period.**

Disclosure of De-Identified Personal Information. We may share De-Identified Personal Information with third parties for any purpose. De-Identified Personal Information or non-Personal Information may be aggregated for system administration and to monitor usage of the Website. It may be utilized to measure the number of visits to our Website, average time spent, number of pages viewed and to monitor various other Website statistics. This monitoring helps us evaluate how visitors use and navigate our Website so we can improve the content. We may share De-Identified Personal Information or anonymous information (including, but not limited to, anonymous usage data, referring/exit pages and URLs, IP address, platform types, number of clicks, etc.) with interested third parties in any way we choose and for any purpose. We may disclose, sell, rent, etc., your De-Identified Personal Information to third parties.

Your Consent to Disclosure/Transfer/Sale of Your Personal Information. You consent to our disclosure of your Personal Information, De-Identified Personal Information, and other information you provide to us (“**Transferred Information**”) to a potential or actual buyer or acquirer of our company or other successor for the purpose of considering a merger, divestiture, restructuring, reorganization, dissolution, change in control, or sale or transfer of some or all of our assets (each of the foregoing referred to as a “**Transfer**”), whether as a going concern or as part of bankruptcy, liquidation or other court proceeding, in which Personal Information held by us is among the assets transferred. You agree to and do hereby consent to (and shall not object to) our assignment, conveyance, transfer, and/or license (whether by contract, merger or operation of law) as part of a Transfer, of any or all of our rights, in whole or in part, in or to Transferred Information and your consents, with or without notice to you and without your further consent. We cannot make any representations regarding the use or transfer of Transferred Information that we may have in the event of our bankruptcy, reorganization, insolvency, receivership, or an

assignment for the benefit of creditors. By providing any Personal Information, you expressly agree and consent to the use and/or transfer of Transferred Information or other information in connection with a Transfer. Furthermore, except as required by law, we are not and will not be responsible for any breach of security by any third parties or for any actions of any third parties that receive any of the Transferred Information that is disclosed to us.

Security

We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration and disclosure. Your Personal Information is contained behind secured networks and a firewall and is only accessible by our personnel and by a limited number of Service Providers who have special access rights to our systems, and who are required to keep the information confidential. Our Website is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our Website safe.

Our agents, contractors, service providers, and partners who require access to your Personal Information in order to provide services to us or to you on our behalf are also required to keep the information confidential in a manner consistent with this Privacy Policy and are not permitted to disclose the information to third parties or use the information for any purpose other than to carry out the services they are performing for us, or as permitted pursuant to our agreement with them.

Data Retention

The time periods for which we retain your Personal Information depend on the purposes for which we use it. This period of retention is subject to our review and alteration.

Privacy Notice for California Residents

The following in this section applies only to California residents.

California Online Privacy Protection Act (“CalOPPA”; Calif. Bus. & Prof. Code § 22575-22578, available here). CalOPPA applies only to companies which collect Personal Information of California residents.

How We Respond to Do Not Track Signals. CalOPPA requires us to let you know how we respond to web browser Do Not Track (“DNT”) signals. DNT is a privacy preference you can set in your web browser to indicate that you do not want certain information about your webpage visits collected across websites when you have not interacted with that service on the page. Details on how to turn on DNT are available [here](#). Because there currently isn’t an industry or legal standard recognizing or honoring DNT signals, we don’t respond to them at this time. We await the result of work by the privacy community and industry to determine when such a response is appropriate and what form it should take. You can visit our Website anonymously by adjusting the settings in your browser.

Third-Party Behavioral Tracking. We do not allow third-party behavioral tracking of Personal Information, though we may use De-Identified Personal Information to track users’ click or browsing patterns.

California Consumer Privacy Act of 2018 (“CCPA”, available here) and its successor, the California Privacy Rights Act of 2020 (available here). If you are a California resident (occasionally referred to as “Consumer”), California law provides you with additional rights regarding our use of your Personal Information. For purposes of this California Consumer Privacy

Notice and only for California residents, the term Personal Information means “personal information” as defined under CCPA.

This “Privacy Notice for California Residents” section does not apply (at least until January 1, 2023) to the Personal Information of California residents that we collect:

- which reflects a written or verbal communication or a transaction between the business and the consumer, where the consumer is a natural person who acted or is acting as an employee, owner, director, officer, or independent contractor of a company, partnership, sole proprietorship, non-profit, or government agency and whose communications or transaction with the business occur solely within the context of the business conducting due diligence regarding, or providing or receiving a product or service to or from such company, partnership, sole proprietorship, non-profit, or government agency; or,
- about you in the course of your acting as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or independent contractor of, our company to the extent that your Personal Information is collected and used by us solely within the context of your role or former role as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or an independent contractor of, our company.

California residents have the right to (a) access a copy of their Personal Information held by us, (b) request deletion of their Personal Information held by us, and (c) opt-out of the sale of their Personal Information (but which is inapplicable to us because we do not sell your Personal Information). These rights can be exercised by contacting us.

The categories of your Personal Information we collect are listed above in the section entitled “Personal Information We Collect.” The purposes for which the categories of Personal Information are or may be used is described above in the section entitled “How We Use Your Information” and in other sections of this Privacy Policy.

No Sale of Personal Information. WE HAVE NOT AND DO NOT SELL (AS THAT TERM IS DEFINED IN THE CCPA) YOUR PERSONAL INFORMATION, PERIOD.

Disclosure of Personal Information for a Business Purpose. In the preceding twelve months, Company has disclosed for a “business purpose” (as that term is defined in the CCPA) personal information in the categories set forth in the section entitled “Personal Information we collect”.

Right to Access Specific Information. You have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past 12 months. Once we receive and confirm your verifiable Consumer request, we will disclose to you:

- The categories of Personal Information we collected about you
- The categories of sources for the Personal Information we collected about you
- Our business or commercial purpose for collecting that Personal Information
- The categories of third parties with whom we share that Personal Information
- The specific pieces of Personal Information we collected about you (also called a data portability request) and provide a copy to you in an electronic or paper format
- If we disclosed your Personal Information for a business purpose, a list disclosing disclosures for a business purpose, identifying the Personal Information categories that each category of recipient obtained

Deletion Request Right. You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable Consumer request, we will delete (and direct our Service Providers to delete) your Personal Information from our records, unless an exception applies (as described below under the section “Exceptions to Requests”).

As permitted by CCPA we may delete your Personal Information by (a) permanently and completely erasing the Personal Information on our existing systems with the exception of archived or back-up systems; (b) de-identifying the Personal Information; or, (c) aggregating the Personal Information.

Exceptions to Requests. We may deny your deletion request if retaining the information is necessary for us or our Service Provider(s) to:

- Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal, regulatory or law enforcement obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights. To exercise the access, data portability, and deletion rights described above, please submit a verifiable Consumer request to us by mail at the mailing address provided below. Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable Consumer request related to your Personal Information. You may also make a verifiable Consumer request on behalf of your minor child. You may only make a verifiable Consumer request for access or data portability twice within a 12-month period. The verifiable Consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative; and,
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. Making a verifiable Consumer request does not require you to create an account with us. We will only use Personal Information provided in a verifiable Consumer request to verify the requestor's identity or authority to make the request.

Verification Process. Upon receiving a data access or deletion request from you we will send an email to you at the email address we have for you on file. The email will ask you to respond to verify you as the Consumer making the request. Upon receipt of your verification we will match your information to that which is in our file. Upon verification of your identity we will proceed to process your request (subject to the exceptions stated above).

We will confirm receipt of your request within ten (10) days of receiving it. We will respond to a verifiable Consumer request within forty-five (45) days of its receipt. If we require more time (up to an additional forty-five (45) days), we will inform you of the reason and extension period in writing.

Any disclosures we provide will only cover the 12-month period preceding the verifiable Consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable Consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Please note that this right does not apply to business-to-business customers, employment applicants, or independent contractors to us, or if the disclosure of Personal Information is for purposes consistent with the California resident's reasonable expectations, when considering the submission's circumstances.

Non-Discrimination. We will not discriminate against you simply for your exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods;
- Charge you different prices or rates for goods, including by refusing to grant discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods, or,
- Suggest that you may receive a different price or rate for goods or a different level or quality of goods.

Notices; Opting Out

By providing us with your email address, you consent to our using the email address to send you notices by email, including any notices required by law (e.g., notice of data privacy or security incidents), in lieu of communication by postal mail. You also agree that we may send you information regarding our Products to the email address you give us, in accordance with any applicable privacy settings. Please note that if you have opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of our Website, and you are still responsible for reading and understanding them.

You can add, update, or delete information as explained above. When you update information, however, we may maintain a copy of the unrevised information in our records. You may request

deletion of your account by emailing us. It is your responsibility to maintain your current email address with us.

Contact Information

If you have any questions about this Privacy Policy or our privacy practices, please contact us at: 1345 West 21st Street, Chicago, Illinois USA; Phone: 800-621-2305. You may also visit our “Contact Us” website page [here](#).

Data Transfer/Access/Privacy Outside of the United States

We have our headquarters in the United States. The Personal Information we or our Service Providers collect may be stored and processed in servers within the United States. As such, we and our service providers may transfer your Personal Information to, or access it in, jurisdictions that may not provide equivalent levels of data protection as your home jurisdiction. We will take reasonable steps to ensure that your Personal Information receives an adequate level of protection in the jurisdictions in which we process it.

If you are a resident or citizen of the UK, European Economic Area (“EEA”), or Switzerland, please see the section below entitled “GDPR”.

If you are a citizen or resident of the UK, EEA, Switzerland, or other regions with laws governing data collection and use that may differ from the laws in the United States, please note that we may transfer your information to a country or jurisdiction that does not have the same data protection laws as your jurisdiction.

If you are a resident of a country other than the United States, you acknowledge and consent to our collecting, transmitting, processing, transferring, and storing your Personal Information out of the country in which you reside.

GDPR

The following provisions apply only if you are a citizen or resident of the UK, EEA, or Switzerland. For such citizens or residents, all processing of your Personal Information is performed in accordance with privacy rights and regulations, in particular, (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, known as the General Data Protection Regulation (“GDPR”), and our processing will take place in accordance with the GDPR. For purposes of the GDPR, we will be the “data controller” of Personal Information (referred to and defined in the GDPR (available [here](#)) as “Personal Data”) we collect through the Website, unless we collect such information on behalf of a “data controller” in which case we will be a “data processor.” This Privacy Policy does not apply to websites, applications that do not display or link to this Privacy Policy or that display or link to a different privacy policy. For UK, EEA, and Switzerland residents and citizens only, to the extent any definition in this Privacy Policy conflicts with a definition under the GDPR, the GDPR definition shall control.

We provide adequate protection for the transfer of Personal Information to countries outside of the UK, EEA, or Switzerland through a series of intercompany agreements based on or incorporating the Standard Contractual Clauses, or we rely on the European Commission’s adequacy decisions about certain countries, as applicable, and/or obtain your consent for these data transfers from Europe to the United States to other countries. We may also need to transfer your information to other group companies or Service Providers in countries outside the EEA. This may happen if

our servers or suppliers and Service Providers are based outside the UK, EEA, or Switzerland, or if you use our products while visiting countries outside this area.

Our Legal Basis for Processing Personal Data (UK, EEA, and Swiss Visitors Only). If you are a visitor using our Website from the UK, EEA, or Switzerland, our legal basis for collecting and using the Personal Data described above will depend on the Personal Data concerned and the specific context in which we collect it. However, we will normally collect Personal Data from you only where we need the Personal Data to provide Products which you have purchased from us, or where the processing is in our legitimate interests or rely upon your consent where we are legally required to do so and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect Personal Data from you or may otherwise need the Personal Data to protect your vital interests or those of another person.

Legitimate Interest Basis for Processing. The collection and processing of your personal information may be necessary for the purposes of our legitimate interests. Such legitimate interest purposes may include:

- fraud prevention
- ensuring network and information security
- indicating possible criminal acts or threats to public security, including enhancing protection of our community against spam, harassment, intellectual property infringement, crime, and security risks of all kind, and enforcing legal claims, including investigation of potential violations of our Terms of Use
- when we are complying with legal obligations
- processing employee or visitor, member, attendee, or registrant data
- direct marketing
- the relevant and appropriate relationship we have with you
- analytics, e.g., assess the number of visitors, page views, use of the Website, etc., in order to understand how our Site is being used, to optimize the Website and/or future communications, and to develop new Website features
- updating your information and preferences
- offering and improving our Products and Website
- enforcing legal claims, including investigation of potential violations of applicable Terms of Use

Your Data Rights Under GDPR. If you are subject to GDPR, your rights include the following:

- **The right to access** - Upon request, we will confirm any processing of your Personal Information and, and provide you with a copy of that Personal Information in an acceptable machine-readable format.
- **The right to rectification** - You have the right to have us correct any inaccurate Personal Information or to have us complete any incomplete Personal Information.
- **The right to erasure** - You may ask us to delete or remove your Personal Information and we will do so in some circumstances, such as where we no longer need it (we may not delete your data when other interests outweigh your right to deletion).
- **The right to restrict processing** - You have the right to ask us to suppress the processing of your Personal Information but we may still store your Personal Information. See below for more information.

- **The right to object to processing** - You have the right to object to your Personal Information used in the following manners: (a) processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling); (b) direct marketing (including profiling); and, (c) processing for purposes of scientific/historical research and statistics. See the section above entitled “Legitimate Interest Basis for Processing” for more information.
- **The right to data portability** - You have the right to obtain your Personal Information from us that you consented to give us or that is necessary to perform fulfillment of member benefits with you. We will give you your Personal Information in a structured, commonly used and machine-readable format.
- **The right to complain to a supervisory authority** - You have the right to file a complaint with a supervisory authority, in particular in the European member state of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of Personal Information relating to you infringes upon your rights.
- **The right to withdraw consent** - If we are processing your Personal Information based on your consent to do so, you may withdraw that consent at any time.