

Privacy Notice:

Updated: August 2021

Thank you for choosing to be part of our community at American Granby Inc. ("**Company**", "**we**", "**us**", "**our**"). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this privacy notice, or our practices with regards to your personal information, please contact us at customerservice@americangranby.com.

When you visit our website <http://www.americangranby.com> (the "**Website**") we appreciate that you are trusting us with your personal information. We take your privacy very seriously. In this privacy notice, we seek to explain to you in the clearest way possible what information we collect when you visit our Website, how we use it and what rights you have in relation to it (the "Privacy Notice"). We hope you take some time to read through it carefully, as it is important. If there are any terms in this Privacy Notice that you do not agree with, please discontinue use of our Website immediately. By accessing or using this Website, you agree to this Privacy Notice. This Privacy Notice may change from time to time (see Section 10). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the notice periodically for updates.

Please read this Privacy Notice carefully as it will help you understand what we do with the information that we collect through our Website

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1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

In Short: We collect personal information that you provide to us or that is collected automatically when you visit our Website.

We collect personal information that you voluntarily provide to us when you fill out the Contact Us inquiry page on the Website. Personal Information is information that can be used to identify you individually as outlined below (“Personal Information”).

The Personal Information that we collect depends on the context of your interactions with us and the Website, the choices you make and the products and features you use. The Personal Information we collect may include the following:

Personal Information Provided by You.

We collect names, phone numbers, email addresses, mailing addresses, and other similar information.

We may also collect login credentials if you are provided a login to our Website.

All Personal Information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such Personal Information.

Information automatically collected.

We automatically collect certain information when you visit, use or navigate the Website. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Website and other technical information. This information is primarily needed to maintain the security and operation of our Website, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies. Cookies are small files used for authenticating, tracking, and maintaining certain information about users which contain the details of your browsing history and services preferences. Cookies help us track usage patterns in order to improve and manage the services and to help us provide personalized service and deliver content specific to your interests. Cookies are also used for statistical reporting for the services and for other purposes relating to making our services available to you.

Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Website. To opt-out of interest-based advertising by advertisers on our Website visit <http://www.aboutads.info/choices/>. If you are located in the European Union (EU) or United Kingdom (UK), we will only use cookies when you have provided us your consent. For more information, please see our Cookie Notice.

The information we collect automatically includes:

- *Log and Usage Data.* Log and usage data is service-related, diagnostic, usage and performance information our servers automatically collect when you access or use our Website and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type and settings and information about your activity in the Website (such as the date/time stamps associated with your usage, pages and files viewed, searches and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps') and hardware settings).
- *Device Data.* We collect device data such as information about your computer, phone, tablet or other device you use to access the Website. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model Internet service provider and/or mobile carrier, operating system and system configuration information.

Special Category Data

We do not collect any Personal Information about you that is identified under the European General Data Protection Regulation (“GDPR”) as special category data. Special category data includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, personal or political opinions, trade union membership, information about your health, and genetic and biometric data. Nor do we collect any information about criminal convictions and offenses. If we learn that we have collected such Personal Information, we will take steps to delete the data as soon as possible.

Google Analytics

Google Analytics is a web analytics services offered by Google that tracks and reports (non-personally identifiable) services traffic. Google uses the data collected to track and monitor the use of our Website. This data is shared with other Google Services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of having made your activity on the services available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visits activity.

2. WHY WE COLLECT PERSONAL INFORMATION AND HOW WE USE YOUR INFORMATION

***In Short:** We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.*

We use Personal Information collected via our Website for a variety of business purposes described below. We process your Personal Information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with

your consent, and/or for compliance with our legal obligations. Specifically, we use the information we collect or receive to:

- To present our Website and its contents to you.
- To provide customer support and respond to contact requests you direct to us
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To notify you about changes to our Website or any products or services we offer or provide through it.
- For promotional mail communications
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

In Short: We may share your information as necessary and in accordance with applicable laws.

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

We may disclose your data that we hold:

- To our subsidiaries, affiliates, and staff.
- To contractors, service providers, and other third parties we use to support our business.
- 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 American Granby's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by American Granby about our Website 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.
- 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 <https://www.americangranby.com/Download/Terms-Of-Use> and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of American Granby, our customers, or others.

4. CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION

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 and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's [website](#). If you disable or refuse cookies, please note that some parts of this Website may then be inaccessible or not function properly.
- **Promotional Offers from the Company.** If you do not wish to have your contact information used by the Company to promote our own products or services, you can opt-out by sending us an email stating your request to customerservice@americangranby.com. This opt out does not apply to information provided to the Company as a result of a product purchase, warranty registration, product service experience or other transactions.

California residents and individuals located in the EU and UK may have additional Personal Information rights and choices. Please see Section 7 and 9 below for more information.

5. HOW DO WE KEEP YOUR INFORMATION SAFE?

***In Short:** We aim to protect your Personal Information through a system of organizational and technical security measures.*

We have implemented appropriate technical and organizational security measures designed to protect the security of any Personal Information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security, and improperly collect, access, steal, or modify your information. Although we will do our best to protect your Personal Information, transmission of Personal Information to and from our Website is at your own risk. You should only access the Website within a secure environment.

6. DO WE COLLECT INFORMATION FROM MINORS?

***In Short:** We do not knowingly collect data from or market to children under 18 years of age.*

We do not knowingly solicit data from or market to children under 18 years of age. By using the Website, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Website. If we learn that Personal Information from users less than 18 years of age has been collected, we will deactivate the account (if applicable) and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at customerservice@americangranby.com.

7. DO INDIVIDUALS LOCATED IN THE EUROPEAN UNION OR UNITED KINGDOM HAVE SPECIFIC PRIVACY RIGHTS?

***In Short:** Yes. If you are a resident of the European Union (EU) or United Kingdom (UK), you have certain data protection rights under GDPR or UK GDPR.*

Legal Basis for Processing Personal Information Under GDPR and UK GDPR.

To process your Personal Information, we must have a legal basis for doing so. We may process your Personal Information under the following conditions:

- **Consent:** We may process your data if you have given us specific consent to use your Personal Information for a specific purpose.
- **Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- **Performance of a Contract:** Where we have entered into a contract with you, we may process your Personal Information to fulfill the terms of our contract.
- **Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.
- **Public interests:** Processing Personal Information is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Company.

We only process your Personal Information where applicable law permits or requires it, including where the processing is necessary for the performance of a contract with you, where the processing is necessary to comply with a legal obligation that applies to us, for our legitimate interests, or with your consent.

Where you have provided your consent to the collection, processing, or transfer of your Personal Information, you may have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, contact us at customerservice@americangranby.com.

Your Data Protection Rights Under GDPR and UK GDPR

In certain circumstances, you have the following data protection rights with respect to the Personal Information that we collect and process:

- **The Right to Request Access.** You have the right to access, update, or delete the information we have about you.

- **The Right of Rectification.** You have the right to have any incomplete or inaccurate information we hold about you corrected.
- **The Right to Object.** You have the right to object to our processing of your Personal Information.
- **The Right to Restrict Processing.** You have the right to request that we restrict the processing of your Personal Information.
- **The Right of Erasure.** In certain circumstances, you have the right to ask us to remove or delete your Personal Information.
- **The Right to be Forgotten.** You have the right to request that we delete your Personal Information, in certain situations.
- **The Right to Transfer.** Upon request we will provide you (or a third-party you have chosen) the Personal Information we have collected about you. Your Personal Information will be provided in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which you initially provided consent for us to use or where we used the Personal Information to perform a contract with you.
- **Withdraw Your Consent.** You have the right to withdraw your consent at any time where we relied on your consent to process your Personal Information.

Data Transfers outside of the European Economic Area (“EEA”) and UK

We are based in the United States of America. We may process, store, and transfer the Personal Information we collect, in and to a country outside your own, with different privacy laws that may or may not be as comprehensive as your own, including the United States of America. You hereby consent to such collection, use, processing, disclosure, and transfer. For further certainty, any consent relating to a right to transfer information referred to in this paragraph shall be deemed to include your consent to the transfer of the applicable information to a jurisdiction which may provide a different level of privacy protection than that available in your own country.

Exercising Your Rights Under GDPR

You may exercise any of the rights enumerated above by contacting us at customerservice@americangranby.com. Please note that we may ask you to verify your identity before responding to such requests. Where your request is repetitive, excessive, or unfounded, we reserve the right to charge you a reasonable fee for costs associated with complying with your request.

If you are a resident in the EEA or UK and you believe we are unlawfully processing your Personal Information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

If you are a resident in Switzerland, the contact details for the data protection authorities are available here: <https://www.edoeb.admin.ch/edoeb/en/home.html>.

8. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Notice.

9. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

***In Short:** Yes, if you are a resident of California, you are granted specific rights regarding access to your Personal Information.*

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits users that are residents of California to request the following information regarding our disclosure of your Personal Information to third parties for those third parties' direct marketing purposes: (i) a list of certain categories of Personal Information that we have disclosed to certain third parties for their direct marketing purposes during the immediately preceding calendar year; (ii) the identity of certain third parties that received Personal Information from us for their direct marketing purposes during that calendar year; and (iii) where the nature of the third parties' business is not reasonably determinable, examples of the products or services marketed (if we have that information) . If you are a California resident and would like to make such a request, please email us at customerservice@americangranby.com.

CCPA Privacy Notice

The California Code of Regulations defines a "resident" as:

- (1) every individual who is in the State of California for other than a temporary or transitory purpose and
- (2) every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose

All other individuals are defined as "non-residents."

If this definition of "resident" applies to you, we must adhere to certain rights and obligations regarding your Personal Information. This Section supplements the information contained in this Privacy Notice above, and applies solely to all visitors, users, and others who reside in the state of California. Under the California Consumer Privacy Act of 2018 (CCPA) and California Civil Code § 1798.83, you have the right to exercise the certain rights outlined below.

What categories of Personal Information do we collect?

We have collected the following categories of Personal Information in the past twelve (12) months from our Website:

Category	Examples	Collected
A. Identifiers	real name, postal address, telephone or mobile contact number, Internet Protocol address, email address and account name	YES
B. Personal information categories listed in the California Customer Records statute	Name, contact information	YES
C. Protected classification characteristics under California or federal law	N/A	NO
D. Commercial Information	N/A	NO
E. Biometric Information	N/A	NO
F. Internet or other similar network activity	N/A	NO
G. Geolocation data	N/A	NO
H. Audio, electronic, visual, thermal, olfactory, or similar information	N/A	NO
I. Professional or employment-related information	N/A	NO
J. Education Information	N/A	NO
K. Inferences drawn from Personal Information	N/A	NO

How do we use and share your Personal Information?

More information about our data collection and sharing practices can be found in this Privacy Notice, specifically Sections 1-3.

Will your information be shared with anyone else?

We may disclose your Personal Information with our service providers pursuant to a written contract between us and each service provider. Each service provider is a for-profit entity that processes the information on our behalf.

We may use your Personal Information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be "selling" of your Personal Information.

American Granby Inc. has not disclosed or sold any Personal Information to third parties for a business or commercial purpose in the preceding 12 months. American Granby Inc. will not sell Personal Information in the future belonging to Website visitors, users and other consumers.

Your rights with respect to your Personal Information

Right to request deletion of the data - Request to delete

You can ask for the deletion of your Personal Information. If you ask us to delete your Personal Information, we will respect your request and delete your Personal Information or direct any service providers to delete your Personal Information from their records, subject to certain exceptions provided by law. Such exceptions include if your Personal Information is necessary to:

- Complete the transaction for which your Personal Information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between us and you
- Detect and protect against security incidents, fraudulent or illegal activity, or for prosecuting those responsible for such activity
- Debug, identify, or repair errors that impair existing functionality
- Exercise free speech
- Comply with the California Electronic Communications Privacy Act
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all applicable ethics and privacy laws
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us
- Comply with an existing legal obligation
- Otherwise use your Personal Information, internally, in a lawful manner that is compatible with the context in which you provided the information

Right to be informed - Request to know

Depending on the circumstances, you have a right to know:

- whether we collect and use your Personal Information;
- 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 or selling that Personal Information.
- The categories of third parties with whom we share that Personal Information.
- If we sold or disclosed your Personal Information for a business purpose, two separate lists disclosing:
 - sales, identifying the Personal Information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the Personal Information categories that each category of recipient obtained.
- The specific pieces of Personal Information we collected about you (also called a data portability request).

In accordance with applicable law, we are not obligated to provide or delete consumer information that is de-identified in response to a consumer request or to re-identify individual data to verify a consumer request.

Right to Non-Discrimination for the Exercise of a Consumer’s Privacy Rights

We will not discriminate against you if you exercise your privacy rights. This means we cannot:

- Deny goods or services to you
- Provide a different level or quality of services to you

Please note that we may charge a different price or rate to you if that difference is reasonably related to the value provided to us by your Personal Information.

Other privacy rights

- You can designate an authorized agent to make a request under the CCPA on your behalf. We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf in accordance with the CCPA.
- If you are 16 or older, you may request to opt-out from future selling of your Personal Information to third parties. Upon receiving a request to opt-out, we will act upon the request as soon as feasibly possible, but no later than 15 days from the date of the request submission. We do not sell the Personal Information of consumers and have not done so in the preceding twelve (12) months.

Exercising Your Rights

To exercise your rights to under CCPA, please submit a request by either:

Calling us at 800-776-2266

Emailing us at customerservice@americangranby.com

You may only submit a request to know twice within a 12-month period. Your request under CCPA must

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

Any disclosures we provide will only cover the 12-month period preceding our receipt of your request. 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.

Verification process

Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. These verification efforts require us to ask you to provide information so that we can match it with information you have previously provided us. For instance, depending on the type of request you submit, we may ask you to provide certain information so that we can match the information you provide with the information we already have on file, or we may contact you through a communication method (e.g. phone or email) that you have previously provided to us. We may also use other verification methods as the circumstances dictate.

We will only use Personal Information provided in your request to verify your identity or authority to make the request. To the extent possible, we will avoid requesting additional information from you for the purposes of verification. If, however, we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity, and for security or fraud-prevention purposes. We will delete such additionally provided information as soon as we finish verifying you.

10. DO WE MAKE UPDATES TO THIS NOTICE?

In Short: Yes, we will update this Privacy Notice as necessary to stay compliant with relevant laws and to reflect any changes to our privacy practices.

We may update this Privacy Notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this Privacy Notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this Privacy Notice frequently to be informed of how we are protecting your information.

11. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this Privacy Notice, you may email us at customerservice@americangranby.com or by post to:

American Granby Inc.
7652 Morgan Road
Liverpool 13090

12. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country, you may have the right to request access to the Personal Information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your Personal Information, please visit: <http://www.americangranby.com/ContactUs>.