



PRIVACY POLICY

(Effective and last revised April 23, 2018)

Welcome to www.saalfeldredistribution.com, an interactive online service operated by Saalfeld Redistribution (“Saalfeld”, “data controller”, “us”, “we”, or “our”).

We respect your privacy and are committed to complying with this privacy policy (“Privacy Policy”), which describes what information we collect about you, including how we collect it, how we use it, with whom we may share it and what choices you have regarding our use of your information. This Privacy Policy applies to information collected on our website located at: www.saalfeldredistribution.com, or any website or mobile application owned, operated or controlled by us that posts a link to this Privacy Policy (the “Websites”). This Privacy Policy, together with the Terms of Access posted on our Websites, sets forth the general rules and policies governing your use of our Websites. Depending on your activities when visiting our Websites, you may be required to agree to additional terms and conditions.

MODIFICATIONS TO THIS PRIVACY POLICY

We generally keep this Privacy Policy posted on our Websites and you should review it frequently, as it may change from time to time without notice. Any changes will be effective immediately upon the posting of the revised Privacy Policy. WHEN YOU ACCESS OUR WEBSITES, YOU AGREE TO THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, OR TO ANY CHANGES WE MAY SUBSEQUENTLY MAKE, IMMEDIATELY STOP ACCESSING OUR WEBSITES. If, at any point, we decide to use your Personal Data in a manner materially different and incompatible with the purposes for which it was originally collected, we will notify you of this change by e-mail to the last e-mail address provided to us. You will have a choice (by means of an “opt-in” opportunity) as to whether or not we use your information in this different manner. We will use information in accordance with the Privacy Policy under which your information was collected if you opt-in to this policy.

A. INFORMATION WE COLLECT

Our Websites typically collect two kinds of information about you: (a) information that you provide that personally identifies you; and (b) information that does not personally identify you and/or that we automatically collect when you visit our Websites or that you provide us (collectively, “Collected Information”).

Personal Data: Our definition of Personal Data includes any information relating to an identified or identifiable individual, such as your name, email address, phone number, etc. In certain circumstances, we may request, allow or otherwise provide you an opportunity to submit your Personal Data in connection with a feature, program, promotion or some other aspect



A. INFORMATION WE COLLECT *continued*

of our Websites. For instance, you may: (a) provide your name, mail/shipping address, email address, credit card number and phone number when registering with our Websites or using our online store; (b) provide certain demographic information about you (e.g., age, gender, purchase preference, usage frequency, etc.) when participating in a survey or poll; or (c) post a general comment and/or recommendation on our Websites. Whether or not you provide this information is your choice; however, in many instances this type of information is required to participate in the particular activity, realize a benefit we may offer, or gain access to certain content on our Websites.

Non-Personally Identifiable and Automatically Collected Information: Non-personally identifiable information can include certain Personal Data that has been de-identified. We obtain non-personally identifiable information about you from information that you provide us, either separately or together with your Personal Data.

We also automatically collect certain usage information from you when you access our Websites. This information can include, among other things, your mobile device, wireless carrier, IP addresses, the type of browser you are using (e.g., Internet Explorer, Firefox, Safari, Opera, etc.), the third party website from which your visit originated, the operating system you are using (e.g., Vista, Windows XP, Mac OS, Android, iPhone, etc.), the domain name of your Internet service provider (e.g., America Online, NetZero, etc.), the search terms you use on our Websites, the specific web pages you visit, and the duration of your visits.

B. HOW WE USE & SHARE THE INFORMATION COLLECTED

Personal Data: In addition to uses described elsewhere in this Privacy Policy, the Personal Data you submit to us is generally used to carry out your requests, respond to your inquiries, process your transactions, improve the user experience or content of our Websites, address integrity or security issues associated with the Websites, for any other business purpose for which you provide the information or for other purposes as required or permitted by law. We may also use this information to later contact you for a variety of reasons, including for customer service purposes and/or to provide you promotional information for our products. We may use third parties such as IT service providers and payment processors, to carry out the foregoing and other business functions and, in such instances, these third parties may use your information for these limited purposes.

In some instances we may share your Personal Data with our co-promotional partners and others with whom we have marketing relationships. Except as provided in this Privacy Policy, our Terms of Access, or as disclosed when you submit the information, your Personal Data will not be shared or sold to any third parties without your prior approval. Further, you may opt-out from receiving future promotional information from us as set forth below.



B. HOW WE USE & SHARE THE INFORMATION COLLECTED continued

Non-Personally Identifiable and Automatically Collected Information: We use non-personally identifiable and automatically collected usage information in a variety of ways, including to help analyze site traffic, understand customer needs and trends, carry out targeted promotional activities, and to improve our services. We may use such information by itself or aggregate it with information we have obtained from other customers or other sources. We may, among other things, share such information with our affiliated companies, allow third parties to collect such information directly from you, and/or sell the non-personally identifiable or automatically collected usage information to third parties to achieve these objectives (e.g., generate revenue, form alliances, etc.).

If you are a data subject located in the European Economic Area (EEA), our legal basis for processing Personal Data concerning you will depend on the Personal Data concerned and the specific context in which we collect it. However, we generally only collect Personal Data from you when: (a) we have your consent to do so, (b) we need the Personal Data to perform a contract with you (e.g. to deliver the services you have requested), or (c) where the processing is in our or a third party's legitimate interests (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.

If we ask you to provide Personal Data to comply with a legal requirement or to perform a contract with you, we will inform you as to whether the provision of your Personal Data is mandatory and of the possible consequences if you do not provide your Personal Data. Similarly, if we collect and use your Personal Data in reliance on our (or a third party's) legitimate interests which are not already described in this Privacy Policy, we will make clear to you at the point of data collection what those legitimate interests are.

C. COOKIES AND PREFERENCE BASED ADVERTISING

By placing a small file known as a "cookie" on your computer (or other device), Saalfeld Redistribution and our third party service providers' servers passively gather information about all visitors' use of the Websites for several reasons, including, but not limited to, the following: statistics collection and analysis, Website optimization, analytics (as described below), market research, and maintenance of user login information. The information that we and our third party service providers track with cookies includes, but is not limited to, the type of browser (such as Google Chrome or Internet Explorer) and Internet-connected devices being used to access the Websites, your Internet protocol ("IP") address, your home domain or Internet service provider, your referrer URL (which is the URL for the website that you were viewing prior to visiting the Websites), how you were directed to the Websites, which specific pages you access on the Websites, how long you view each page, the time and date you access our Websites and the total number of visitors to the Websites and any portions thereof. We, and/or our third party service providers, may use the information collected from cookies or similar files on your



C. COOKIES AND PREFERENCE BASED ADVERTISING continued

computer for security purposes (such as authentication), to facilitate site navigation and to personalize your experience while visiting the Websites. This data helps us and our third party service providers improve our respective product and services. For more information about how we use cookies, please see our Cookie Statement.

Most popular Internet browser applications will allow you to configure the browser so as not to accept cookies. However, setting your browser to reject cookies may, in certain instances, prevent you from taking full advantage of the Websites (or some portion thereof) and its capabilities, or cause some features of the Websites to function improperly or more slowly.

Google Analytics and Web Beacons

Our Websites may use Google Analytics, a web analysis service provided by Google, in order to better understand your use of our Websites and how we can improve it. We will use certain Google Analytics Advertising Features on the Websites, including Google Tag Manager, Adwords PPC, Adwords Remarketing, and Adwords Display. Google Analytics collects information such as how often users visit a website, what pages you visit when you do so, and what other websites you used prior to coming to such website. Google Analytics collects only the IP address assigned to you on the date you visit a website, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with your Personal Data. Although Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit a website, the cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to Saalfeld's Websites is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. Google utilizes the data collected to track and examine the use of the Saalfeld Websites, to prepare reports on its activities and share them with other Google services. Google may use the data collected on the Saalfeld Websites to contextualize and personalize the ads of its own advertising network. To more fully understand how Google may use the data it collects on the Saalfeld Websites, please review "How Google uses data when you use our partners' sites or apps," (located here or any successor URL). For more information about Google Analytics' currently available opt-outs for the web please visit <https://tools.google.com/dlpage/gaoptout/>.

Some of the areas of the Websites may contain electronic images known as web beacons (sometimes known as clear gifs) that allow Saalfeld, and our third party providers or affiliates, to count and track users who have visited certain portions of the Websites. Web beacons collect only limited information. Specifically, Saalfeld plans to use a type of web beacon known as a "retargeting pixel," which will allow users to receive targeted advertising from Saalfeld via certain social media websites, including Facebook.com.



D. OTHER USES

IP Addresses: An IP address is a number that is automatically assigned to your computer whenever you access the Internet. Web servers (computers that “serve up” web pages) automatically identify your computer by its IP address. When visitors request pages from our Websites, our servers typically log their IP addresses. We collect IP addresses for purposes of system administration, to report non-personal aggregate information to others, and to track the use of our Websites. It is not our practice to link IP addresses to anything personally identifiable; that is, the visitor’s session will be logged, but the visitor remains anonymous to us. However, we reserve the right to use IP addresses to identify a visitor when we feel it is necessary to enforce compliance with our Websites rules or to: (a) fulfill a government request; (b) conform with the requirements of the law or legal process; (c) protect or defend our legal rights or property, our Websites, or other users; or (d) in an emergency to protect the health and safety of our Websites’s users or the general public.

Email Communications: If you send us an email with questions or comments, we may use your Personal Data to respond to your questions or comments, and we may save your questions or comments for future reference. For security reasons, we do not recommend that you send non-public Personal Data, such as passwords, social security numbers, or bank account information, to us by email. However, aside from our reply to such an email, it is not our standard practice to send you email unless you request a particular service or sign up for a feature that involves email communications, it relates to purchases you have made with us (e.g., product updates, customer support, etc.), we are sending you information about our other products and services, or you consented to being contacted by email for a particular purpose. In certain instances, we may provide you with the option to set your preferences for receiving email communications from us; that is, agree to some communications but not others. You may “opt out” of receiving future commercial email communications from us by clicking the “unsubscribe” link included at the bottom of most emails we send, or by contacting us as provided below; provided, however, we reserve the right to send you transactional emails such as customer service communications.

Transfer of Assets: As we continue to develop our business, we may sell or purchase assets. If another entity acquires us or all (or substantially all) of our assets, the Collected Information we have about you will be transferred to and used by this acquiring entity, though we will take reasonable steps to ensure that your preferences are followed. Also, if any bankruptcy or reorganization proceeding is brought by or against us, all such information may be considered an asset of ours and as such may be sold or transferred to third parties.

Other: Regardless of any other provision in this Privacy Policy, we reserve the right to disclose any Collected Information about you if we are required to do so by law, with respect to copyright and other intellectual property infringement claims, or if we believe that such action is necessary to: (a) fulfill a government request; (b) conform with the requirements of the law or legal process; (c) protect or defend our legal rights or property, our Websites, or other users; or (d) in an emergency to protect the health and safety of our Websites users or the general public.



E. YOUR PRIVACY RIGHTS

Data subjects in the European Economic Area and certain other territories may have certain rights under applicable data protection law, including the right to:

- Request access to and rectification or erasure of Personal Data. This means you may have the right to request access to the Personal Data we hold about you, to have inaccurate or incomplete data rectified, or to have Personal Data we hold about you erased in certain circumstances (such as when it is no longer needed for the purpose for which it was collected).
- Request restriction of processing of Personal Data concerning you. This means you may have the right to request that we restrict processing of your Personal Data in certain circumstances (for example, where you believe that the Personal Data we hold about you is inaccurate).
- Object to processing. This means that in certain circumstances, you may have the right to request that we stop processing your Personal Data and/or stop sending you direct marketing communications.
- Data portability. This means that in certain circumstances, you may have the right to be provided with your Personal Data in a structured, machine readable and commonly used format or to request that we transfer the Personal Data to another data controller.

Where we rely on your consent to process your Personal Data, you have the right to withdraw or decline your consent at any time. Please note that this does not affect the lawfulness of the processing based on consent before its withdrawal.

To exercise your rights, you may contact us as set forth in the 'Contact & Opt-Out Information' section below. To protect your privacy and security, we may take steps to verify your identity before complying with your request.

Additionally, you have the right to lodge a complaint with the supervisory authority. For more information, please contact your local data protection authority.

F. YOUR CALIFORNIA PRIVACY RIGHTS

Residents of the State of California, under certain provisions of the California Civil Code, have the right to request from companies conducting business in California a list of all third parties to which the company has disclosed certain Personal Data as defined under California law during the preceding year for third party direct marketing purposes. You are limited to one request per calendar year. In your request, please attest to the fact that you are a California resident and provide a current California address for our response. You may request the information in writing as provided below.



G. PUBLIC FORUMS

We may offer chat rooms, blogs, message boards, bulletin boards, or similar public forums where you and other users of our Websites can communicate. The protections described in this Privacy Policy do not apply when you provide information (including Personal Data) in connection with your use of these public forums. We may use Personal Data and non-personally identifiable information about you to identify you with a posting in a public forum. Any information you share in a public forum is public information and may be seen or collected by anyone, including third parties that do not adhere to our Privacy Policy. We are not responsible for events arising from the distribution of any information you choose to publicly post or share through our Websites.

H. CHILDREN

The Websites are intended for a general audience and are not intended for use or view by children under 13 years of age without parental consent, and we do not knowingly collect information about children or sell products to children. Consistent with the Children's Online Privacy Protection Act, we will not knowingly collect any information from children under the age of 13. If you are under the age of 13, you must ask your parent or guardian to assist you in using the Websites. Furthermore, we may restrict entries to any contests, sweepstakes or promotions to entrants who are at least 18 years of age.

I. KEEPING YOUR INFORMATION SECURE

We have implemented security measures we consider reasonable and appropriate to protect against the loss, misuse and alteration of the information under our control. Please be advised, however, that while we strive to protect your Personal Data and privacy, we cannot guarantee or warrant the security of any information you disclose or transmit to us online and are not responsible for the theft, destruction, or inadvertent disclosure of your Personal Data. You agree to immediately notify us of any Websites' security incidents, this Privacy Policy, or the Terms of Access of which you become aware.

J. RECORD RETENTION

We will retain your Personal Data only for so long as is required to provide the products or services described in this Privacy Policy, or for such longer period as may be required or permitted by applicable law. The criteria used to determine the retention periods include:

- How long the personal data is required to respond to your request, provide the products or services to you, or operate our business.
- Whether you have provided consent for a longer retention period.
- Whether Saalfeld is subject to a legal, contractual or similar obligation to retain the data.



K. OTHER SITES/LINKS

Our Websites may link to or contain links to other third party websites that we do not control or maintain, such as in connection with purchasing products referenced on our Websites and banner advertisements. We are not responsible for the privacy practices employed by any third party website. We encourage you to note when you leave our Websites and to read the privacy statements of all third party websites before submitting any Personal Data.

L. CONTACT & OPT-OUT INFORMATION

You may contact us as at contactus@saalfeldcorp.com or the postal address below if: (a) you have questions or comments about our Privacy Policy; (b) wish to make corrections to any Personal Data you have provided us; (c) want to opt-out from receiving future commercial correspondence from us; (d) want to exercise your rights under applicable data protection law; or (e) wish to withdraw your consent to our sharing of your Personal Data with relevant co-promotional partners. We will respond to your request and, if applicable and appropriate, make the requested change in our active databases as soon as reasonably practicable. Please note that we may not be able to fulfill certain requests while allowing you access to certain benefits and features of our Websites.

M. VISITING THE WEBSITES FROM OUTSIDE THE UNITED STATES

If you are visiting the Websites from outside of the United States of America, please be aware that your information may be transferred to, stored or processed in the United States, where our servers are located and our central database is operated. The data protection laws of the United States have not been deemed adequate by the European Commission, and might not be as comprehensive as those in your country, but please be assured that we take steps to protect your privacy. By using any portion of the Websites, you understand and consent to the transfer of your information to our facilities in the United States and those third parties with whom we share it as described in this Privacy Policy.

N. DO NOT TRACK REQUESTS

California and Delaware laws require that we indicate whether we honor “Do Not Track” settings in your browser concerning targeted advertising. “Do Not Track” is a standard that is currently under development. As it is not yet finalized, we adhere to the standards set out in this Privacy Policy and do not monitor or respond to any Do Not Track browser requests.

O. SOLE STATEMENT

This Privacy Policy as posted on our Websites is the sole statement of our privacy policy with respect to our Websites, and no summary, modification, restatement or other version thereof, or other privacy statement or policy, in any form, is valid unless we post a new or revised policy to the Websites.



ACKNOWLEDGEMENT

BY ACCESSING OR USING THE WEBSITES, OR ANY PORTION THEREOF, YOU ACKNOWLEDGE THAT YOU HAVE READ, UNDERSTAND, AND CONSENT TO THE PRIVACY POLICY, AND TO THE USES AND DISCLOSURES OF COLLECTED INFORMATION ABOUT YOU, THAT ARE DESCRIBED IN THIS PRIVACY POLICY AND YOU AGREE TO BE BOUND BY THE TERMS OF ACCESS REFERENCED ABOVE.

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Saalfeld Redistribution
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