

IDEAL INDUSTRIES, INC. PRIVACY POLICY

Effective Date: June 1, 2018

This Privacy Policy describes how IDEAL INDUSTRIES, INC. and our [Family of Companies](#) (“**IDEAL**” or each, and “**Entity**”) collect, process, store, transfer and delete Personal Information. Please read this Privacy Policy carefully. This Privacy Policy is incorporated into and made a part of our [Terms of Use](#).

1. SCOPE

This Privacy Policy applies to IDEAL’s processing of Personal Information in the context of its establishments in the European Economic Area (the “**EEA**”), as well as IDEAL’s offering of goods and services or monitoring the behavior of individuals located in the EEA. This Privacy Policy describes how IDEAL collects and otherwise processes Personal Information (as defined below) in connection with:

- Your use of our website and mobile applications that link to this Privacy Policy (our “**Online Services**”);
- Subscriptions to our newsletters and other marketing messages;
- Invitations to and participation in our events;
- Recruitment processes;
- Customer/contractor and potential customer/contractor matters; and
- Procurement and potential procurement matters.

This Privacy Policy does not apply to information collected by any third-party websites or services that are not owned or operated by IDEAL or that do not link to this Privacy Policy. This Privacy Policy also does not apply to the Personal Information that we may collect in the context of your employment or other working relationship with IDEAL.

2. IDEAL AS DATA CONTROLLER

This Privacy Policy is provided on behalf of IDEAL and each of its [Family of Companies](#), and there are no joint controllers with regard to Personal Information collected under this Privacy Policy. Depending on the type of or location our services are provided, different Entities may be the data controller in relation to your Personal Information. The data controller (“**we**”, “**us**”, “**our**”) is the Entity named when we collect your Personal Information or in the location where IDEAL referred you to this Privacy Policy (e.g., the Entity identified in the email signature containing a link to this Privacy Policy).

If no Entity has been clearly identified, the data controller or data controllers may be identified in the following order or precedence:

- For Personal Information that IDEAL collects on or through its websites and mobile applications, the Entity that operates the website or mobile application is the data controller.
- For Personal Information that is collected in connection with our newsletters and other marketing message, the data controller is identified on the subscription form and in each message.
- For Personal Information collected in connection with invitations and participation in events, the data controller will be the Entity which is organizing such event as identified in the invitation.
- For Personal Information collected in the context of a recruitment process, the data controller is the Entity identified in the job posting or otherwise seeking to source a position.
- For Personal Information that IDEAL collects pursuant to a customer or contractor relationship, the IDEAL Entity with which you have the customer or contractor relationship is the data controller.
- For activities in the context of the procurement of products and services, the data controller will be the Entity identified in the order form, agreement, or similar document.

If you have any doubt about the controller or controllers of your Personal Information, please contact us using the information in the section “How To Contact us” at the end of this Privacy Policy.

3. CHANGES TO THIS PRIVACY POLICY

The Effective Date of this Privacy Policy is set forth at the top of this webpage. If we make a material change to the way we treat your Personal Information, as defined below, we will notify you in advance using any reasonable method, such as by email or through our Online Services. Any amended Privacy Policy supersedes all previous versions.

4. INFORMATION WE COLLECT

We (or our services providers on our behalf) may collect your Personal Information. “**Personal Information**” means information relating to an identified or identifiable natural person. For example, Personal Information may include:

- **Contact Information** (such as name, address, phone number or email address);
- **Financial Information** (such as credit card number or billing address);
- **Demographic Information** (such as gender, date of birth or zip/postal code);
- **Recruitment Information** (such as curriculum vitae/resume, work history, and qualifications);
- **Location Information** (such as the location of your device derived from GPS or WiFi use, the location of your IP address, or other information that indicates the current or prior location);
- **Online Identifiers** (such as IP address and device ID); and
- Any other information that you provide us that can be used to identify you.

We also may collect information about your use of the Online Services, such as your browser information, pages clicked, and time spent navigating the site. This information cannot be used to identify you. If we link this information with any Personal Information, we will treat such linked information as Personal Information.

We collect Personal Information from:

- **Direct interactions with us**, such as when you register with us, participate in our contests or surveys, interact with us at an event, purchase a product or service, or otherwise contact us;
- **Through Social Media**, such as if you link to social media platforms or use social media plug-ins, we may (depending on your user privacy settings on that social media platform) automatically receive information about you from that social media platform;
- **Cookies and automated technologies**, such as when you interact with our website, mobile applications or click on links on our emails;
- **Mobile applications**, such as when you use mobile applications that we may offer as part of our Online Services;
- **Security systems**, such as when you visit our offices we may obtain closed circuit television (“CCTV”) footage and other information through electronic means such as security/swipe card records. and
- **From other sources** such as business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, and credit reference agencies.

5. HOW WE COLLECT AND USE YOUR PERSONAL INFORMATION

Below is a description of the Personal Information we collect, the likely source of the Personal Information, how we may use it, and for what purposes and pursuant to what legal basis.

Use of your Personal Information	Categories of Personal Information we Process	Source of the Personal Information	Legal Basis
Register for a service	Contact Information and other information	You	Legitimate interests: To enable your registration

Use of your Personal Information	Categories of Personal Information we Process	Source of the Personal Information	Legal Basis
	you provide, such as your topic preferences and areas of interest		Contract: As may be described on the registration page
Obtain your subscription preferences and send eNewsletters and similar marketing communications	Contact Information and other information you provide, such as your topic preferences and areas of interest	You	Legitimate Interest: To provide you with information you need and other services you request and to efficiently communicate with you
Respond to inquiries and fulfill requests	Contact Information and other information you provide, such as your requests	You	<p>Legitimate Interest: To provide you with information you need and other services you request and to efficiently communicate with you</p> <p>Consent: We will send you marketing communications by email and text/SMS pursuant to your consent</p> <p>Contract: If you are a customer or prospective customer</p>
Fulfill purchases and other paid services	Contact Information, Financial Information, and other information you provide, such as your preferences or areas of interest	You	<p>Contract: To maintain your order/purchase history to fulfill orders, ensure proper delivery, or provide other services related to your purchases.</p> <p>Note: We use a third party payment processor to collect and process your credit card information. We do not collect, access, store or process any credit card information related to your online transactions.</p>
Conduct surveys and questionnaires	Contact Information and other information you provide, such as your survey answers	You	<p>Legitimate interests: To evaluate and take action with regard to your feedback and comments about our services</p> <p>Contract: If you are our customer or prospective customer</p>
Register for online and in person events and deliver event-related materials	Contact Information other information you provide, such as your preferences for the event	You	<p>Legitimate interests: To enable your attendance at our events and to deliver you event materials</p> <p>Contract: As may be described on the registration page for the event</p>

Use of your Personal Information	Categories of Personal Information we Process	Source of the Personal Information	Legal Basis
Obtain current contact data and update contact records in our CRM	Contact Information and other information you provide, such as your relationships to people at IDEAL	You and public sources, such as LinkedIn	Legitimate interests: To ensure the integrity of our customer and other contact data
Perform website analytics	Online Identifiers, Demographic Information, and other information we collect, such as interests, behavior tracking, event tracking	First and third party analytics cookies	Legitimate interests: To understand more about our website visitors (what pages you view, how long you visit, your devices, etc.) in order to improve our services
Deliver online advertising	Online Identifiers, Demographic Information, and other information we collect, such as interests, behavior tracking, event tracking	First and third party analytics cookies	Legitimate interests: To understand more about our website visitors in order to deliver relevant advertisements
Recruit personnel	Contact Information, Recruitment Information, and other information relevant to potential recruitment by IDEAL, such as your resume, any cover letter/application, work history, qualifications, and reference information.	You, your references, your former employers, and public sources	Pre-contractual Measures: To recruit and evaluate potential candidates to join IDEAL Legal obligations: To comply with applicable legal obligations, including in the field of employment law Legitimate interest: To make the best recruitment decisions for our business
Obtain and review security footage	Image	You	Legitimate interests: To ensure the security and safety of our facilities.

Any other purposes for which we wish to use your Personal Information that are not listed above, or any other changes we propose to make to the existing purposes will be notified to you by amending this Privacy Policy in accordance with the Section titled “Changes to this Privacy Policy” above.

If we need to collect Personal Information by law or under the terms of a contract we have with you and you fail to provide us with the information when requested, we may not be able to perform the contract we have, or are trying to enter into, with you. We will inform you of any mandatory Personal Information we require from you and the consequences if you fail to provide it.

6. COOKIES AND OTHER DATA COLLECTION TECHNOLOGY (ONLINE SERVICES)

Cookies are small text files that are sent to or accessed from your web browser or your computer's hard drive. A cookie typically contains the name of the domain (internet location) from which the cookie originated, the “lifetime” of the cookie (i.e., when it expires) and a randomly generated unique number or similar identifier. A cookie also may contain information about your computer, such as user settings, browsing history and Internet activities. We use the following types of cookies on our Online Services:

- **Session Cookies** are used to operate our Online Services. Some cookies are essential for the operation of the Online Services. If a user chooses to disable cookies, certain content and features may not be available.
- **Preference Cookies** are used to remember your preferences. For example, when you select your location on one of our Online Services, we use cookies to remember your location preferences so you do not have to select it every time you visit the Online Service.
- **Advertising Cookies** are used to serve you with advertisements that we believe are relevant to you and your interests. These cookies also help us evaluate our marketing program performance and analytics.
- **Security Cookies** are used for general security purposes, such as user authentication and preventing fraudulent use or unauthorized access of data.

A **web beacon** (also called a pixel tag or clear GIF) is a piece of computer code that enables us to monitor user activity and website traffic. To learn more about cookies and web beacons, visit www.allaboutcookies.org. We refer to cookies, web beacons, and other similar technology as “**Data Collection Technology**.” Data Collection Technology enables us to remember your password for future log-ins, compile statistics about use of the Online Services, and detect and prevent fraud. Data Collection Technology also helps us and our ad management partners manage our online marketing program and deliver ads that are relevant or may be of interest to you.

Why IDEAL uses Data Collection Technology: We use Data Collection Technology to collect certain information to help us personalize and improve the performance of our Online Services. For example, we use Google Analytics to collect information to improve the Online Services, such as how often users visit a website, what pages they visit when they do so, and what other website they used prior to visiting the Online Services. Google Analytics places a cookie on your web browser so that it can identify you the next time you visit the 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 the Online Services is restricted by the [Google Analytics Terms of Use](#) and the [Google Privacy Policy](#).

We also use Adobe Marketing Cloud solutions to collect and analyze information, such as clicks made by visitors on our websites, apps and social networking pages to enable us better understand our online resources and marketing campaigns. For more information about Adobe Marketing Cloud, please review the [Adobe Marketing Cloud Privacy Policy](#). IDEAL participates in the Adobe Marketing Cloud Device Co-op to better understand how you use our Online Services across the various devices you use, and to deliver tailored promotions. Go to <https://cross-device-privacy.adobe.com> to learn more about how Adobe does this and to manage your choices relating to this linking of devices.

Controlling cookies on your computer: If you visit an Online Service that uses cookies, we will notify you of such use. You may, at any time, choose to express or change your preferences with regard to accepting cookies. If you do not wish to receive cookies, you may set your browser to reject cookies or alert you when a cookie is dropped on your computer. Usually, these settings are available through the security features of your web browser, and you should be able to consult the Help feature available for your browser for further information. Please be aware that if you disable cookies, some features on the IDEAL websites may not be available, such as those features which require identification. If need be, IDEAL will reject any responsibility for the consequences associated with degraded operation of its Online Services resulting from rejection of deletion of cookies and IDEAL’s subsequent inability to register or consult the cookies necessary for operation.

Our policy on “Do Not Track” signals: California’s Online Privacy Protection Act requires website operators to disclose how they respond to web browser’s “Do Not Track” (“DNT”) signals. Some web browsers incorporate a DNT or similar feature that signals to websites that a user does not want to have his or her online activity tracked. If a website that responds to a particular DNT signal receives the DNT signal, the browser can block that website from collecting certain information about the browser’s user. Not all browsers offer a DNT option and DNT signals are not yet uniform. For this reason, many website operators, including IDEAL, do not respond to DNT signals.

Interest-Based Advertising. Interest-based advertising is a way that helps companies provide you with more relevant advertising on the websites you visit or the applications you use. If you want to “opt out” of receiving online interest-based advertisements, please follow the instructions at www.aboutads.info/choices or <http://www.networkadvertising.org/choices/>. An “opt-out” cookie will be placed on your device indicating that you do not want to receive interest-based advertisements. Please note that when you “opt-out” of receiving interest-based advertisements, this does not mean you will no longer see advertisements from us or on the Online Services. It means that the online ads that you do see will not be based on your particular interests. If you delete cookies on your device, generally you will need to opt-out again. More information about online behavioral advertising can be found at www.aboutads.info.

7. HOW WE MAY SHARE YOUR PERSONAL INFORMATION

We may share Personal Information as follows:

- **Affiliates:** We share Personal Information within our corporate family for the purposes described in this Privacy Policy and as required or authorized by law. Affiliates are those companies that are under common control of our parent company IDEAL INDUSTRIES, INC.
- **Service providers:** Unless prohibited by applicable law, we may share Personal Information with our third-party service providers that help us operate our business, such as for website hosting, professional services, analytics, customer service, e-mail delivery and auditing. Such service providers must process the Personal Information we share with them only on our behalf and for the same purposes for which the Personal Information was collected. We will not sell or lease your Personal Information to any third parties for marketing purposes.
- **Corporation transaction:** Unless prohibited by applicable law, we may share, transfer or delete your Personal Information if we are involved in a merger, sale, acquisition, divestiture, restructuring, reorganization, dissolution, bankruptcy or other change of ownership or control by IDEAL or any affiliated company (in each case, whether in whole or in part). If required by applicable law, any such sharing of Personal Information will be reported to regulators in accordance with the applicable law.
- **Other lawful disclosures:** We may also share Personal Information: (i) if we determine that disclosure is necessary to comply with any law or legal process applicable to us or a request from law enforcement or other regulatory agency; (ii) to protect the rights, privacy, property, interests or safety of our company or our affiliates, customers, business partners, suppliers, employees or the general public; (iii) to pursue available remedies or limit damages; (iv) to enforce our Terms of Use; (v) to respond to an emergency; and (vi) as otherwise permitted by applicable law.

8. THIRD-PARTY WEBSITES AND SERVICES

Our Online Services and other materials may include links or references to third-party websites and services that we do not operate. A link or reference to a third-party service does not mean that we endorse it or the quality or accuracy of information presented. If you visit a third-party website or otherwise interact with that third-party, you are subject to that third party's privacy practices and policies, and we do not accept any responsibility or liability in this regard. This Privacy Policy does not apply to any Personal Information that you provide to these other websites and services.

9. CHILDREN'S PRIVACY

Our services, including our Online Services, are not directed to or intended for use by minors. Consistent with the requirements of the U.S. Children's Online Privacy Protection Act and similar rules in other jurisdictions, if we learn that we have received any Personal Information directly from a child under age 16, or such other age as set by the laws of jurisdictions where we operate without his or her parent's verified consent, we will use that Personal Information only to respond directly to that child (or his or her

parent or legal guardian) to inform the child that he or she cannot use our services and subsequently we will delete that Personal Information.

10. SECURITY OF YOUR PERSONAL INFORMATION

We implement appropriate technical and organizational measures designed to ensure your Personal Information is protected from unauthorized access, use, disclosure, alteration or destruction, in accordance with applicable laws and regulations. For example, we limit access of your Personal Information to authorized parties, periodically inspect, assess, and evaluate the effectiveness of our technical and organizational measures designed to ensure the security of our processing, and limit our collection and use of your Personal Information to the extent necessary to provide you with our services.

Unfortunately, however, no system or online transmission of data is completely secure. We cannot guarantee the security of Personal Information. Any transmission is at your own risk and we request that you use appropriate security measures to protect your Personal Information. If you believe that Personal Information you provided to us is no longer secure, please notify us immediately using the contact information provided below.

If you would like to know more about how we protect your Personal Information, you can contact us using the information in the section “How To Contact Us” at the end of this Privacy Policy.

11. RETENTION OF PERSONAL INFORMATION

We will keep your Personal Information for as long as necessary to fulfill the purposes we collected it for, including any legal, accounting or reporting requirements. To determine the appropriate retention period for Personal Information, we consider the amount, nature, and sensitivity of Personal Information, the potential risk of harm from unauthorized use or disclosure of your Personal Information, the purposes for which we process your Personal Information, whether we can achieve those purposes through other means, and all applicable legal requirements.

12. YOUR RIGHTS AND CHOICES

Opting out of Marketing Information: If you do not wish to receive marketing-related emails from us or prefer us not to process your Personal Information for marketing purposes, please be sure that any relevant boxes on forms we use to collect your Personal Information are unchecked, click the unsubscribe link in one of our marketing emails, or contact us using the information in the section “How To Contact Us” at the end of this Privacy Policy. Please note that even if we stop all marketing communications, you may still receive administrative, legal, and other important communications from us.

Opting out of our collection of your Location Information: If you do not want us to collect Location Information from your device, please delete our mobile application or disable your device’s location settings. Please note that disabling the location setting may affect certain features of the mobile application.

Maintaining the Accuracy of your Personal Information: We must ensure that your Personal Information is accurate and up to date. Please advise us of any changes to your Personal Information by contact using the information in the “How To Contact Us” section below.

Rights of Individuals in the European Economic Area: If you are located in the European Economic Area, you have the following rights with regard to your Personal Information:

- **Right to access** information about how we process your Personal Information, including the categories of Personal Information we process, recipients of your Personal Information, and purposes for our processing.

- **Right to rectification** of inaccurate Personal Information concerning you, as well as, taking into account the purposes of the processing, the right to have incomplete Personal Information completed.
- **Right to erasure** (deletion) of Personal Information concerning you where: (a) the Personal Information is no longer necessary in relation to the purposes for which they were collected or otherwise processed; (b) you withdraw your consent and there are no other legal grounds for the processing; (c) you exercise your right to object (see below) and there are no compelling legitimate grounds for the processing; (d) the Personal Information have been unlawfully processed; or (e) the Personal Information have to be erased for compliance with a legal obligation applicable to us.
- **Right to restriction** of processing (i.e., data will be blocked from normal processing but not erased) where: (a) you contest the accuracy of the Personal Information, for a period enabling us to verify the accuracy; (b) the processing is unlawful and you oppose the erasure of the Personal Information and requests the restriction of their use instead; (c) we no longer need the Personal Information for the purposes of the processing but they are required by you for the establishment, exercise or defense of legal claims; (d) you exercise your right to object (see below) pending the verification whether our legitimate grounds override those of you.
- Where processing is based on your consent, the **right to withdraw consent** at any time, without affecting the lawfulness of the processing prior to such withdrawal. Please note that even after you have chosen to withdraw your consent we may be able to continue to process your Personal Information in some limited circumstances.
- Where processing is based on your consent, or on a contract, the **right to data portability**, i.e. the right to obtain a copy of the data concerning you in a structured, commonly used and machine-readable format and the right to transmit those data to another controller without hindrance from us.
- **Right to object** to the processing of Personal Information based on our legitimate interests, provided that there are no compelling legitimate grounds for the processing that would override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

If you wish to exercise any of your rights above, please contact us using the information in the section “How To Contact Us” at the end of this Privacy Policy. We may charge you a reasonable fee in case you request additional copies of your Personal Information or make other requests that are manifestly unfounded or excessive. If we are unable to honor your request, or before we charge a fee, we will let you know why. In so far as practicable and required under law, we will notify third parties with whom we have shared your Personal Information of any request for correction, deletion, and/or restriction to the processing of your Personal Information. Please note that we cannot guarantee third parties will comply with your requests and we encourage you to contact those third parties directly.

Please note that if you decide to exercise some of your rights, we may be unable to perform the actions necessary to achieve the purposes set out above or you may not be able to use or take full advantage of the services we offer.

13. INTERNATIONAL TRANSFER

IDEAL is committed to complying with this Privacy Policy and European data protection laws with regard to information transferred from the EEA. The laws in the United States and other countries outside the EEA may not be as protective as the laws in Europe. Because of this, IDEAL has taken steps to protect your privacy and fundamental rights when your Personal Information is transferred to the United States (and to other countries where no adequacy decision of the European Commission exists). If you would

like to know more about how we protect your Personal Information, you can contact us using the information in the section “How To Contact Us” at the end of this Privacy Policy.

14. HOW TO CONTACT US

We welcome your questions or comments about this Privacy Policy or how we process your Personal Information. Please contact us using the information below and we will route your question or comment to the appropriate data controller. We will respond to you as soon as reasonably possible and within the time frame set forth in the applicable law.

By Mail: IDEAL INDUSTRIES, INC.
 Attn: Privacy
 1375 Park Ave.
 Sycamore, IL 60178 USA

By Email: privacy@idealindustries.com

You always have the right to lodge a complaint with your local competent supervisory authority or any authority that applies to IDEAL.