

## PETERSEN PRODUCTS COMPANY PRIVACY POLICY

Last Updated: June 22 2021

This privacy policy ("**Privacy Policy**") describes how Petersen Resources, LLC ("**Petersen,**" "**Company**", "**we**", "**our**" or "**us**") uses the information that we process in connection with your use of use of this website and any other website we operate that links to this Privacy Policy (collectively, our "**Sites**"), our mobile application (our "**App**"), and all other products or services available through our Sites or App (collectively, our "**Service**").

Please read this Privacy Policy carefully to better understand how we collect, use, and disclose information about you as you use our Service. Any changes to this Privacy Policy will appear on this page, so we encourage you to review it periodically.

### **INFORMATION WE COLLECT.**

The types of information we may collect includes, but is not limited to the following:

- Name;
- Home Address
- Work Address
- Billing Address
- Shipping Address
- Email address;
- Phone number;
- Photos, messages, videos and comments
- Any other user generated content.

### **INFORMATION COLLECTED DIRECTLY FROM YOU.**

We collect information that you provide to us directly when you:

- Create an account;
- Purchase a product;
- Contact us to ask a question or otherwise communicate with us;
- Respond to surveys;
- Participate in a contest, give-a-way, or other promotional activity;
- Request customer service including dispute resolution, correspondence through our sites, and any correspondence sent to us;

- Post a review or comment on one of our sites, or post other user-generated content on one of our sites or Services;
- Sign up to receive announcements, newsletters, or other promotional or informational materials.

## **WEBSITE NAVIGATIONAL TOOLS AND HOW THEY ARE USED.**

Certain information on our Service is collected automatically by means of various software tools. We use such information to assist in systems administration, information security and abuse prevention, to track user trends, and to analyze the effectiveness of our Service.

### **(i) Cookies.**

As you navigate the Company website (whether or not you register as a user), personal information may be collected automatically through the use of commonly used information gathering tools such as cookies (imbedded code that recognizes your browser), web beacons (clear electronic images that can recognize certain types of information) and other existing or future tracking technology. Additionally, we collect other information from your Web browser, such as browser type, your internet protocol address and actions you have taken on our website (i.e., pages viewed and clicked links).

Cookies are small text files that a website can write to your computer. We may use cookies to identify you and facilitate subsequent access to the website. Flash cookies are local stored objects on your computer that collect and store information about your preferences and navigation to, from and on the Company website.

Web beacons are small electronic files that permit Company to collect website statistics such as how many users visited the website. Such information is used to determine the popularity of certain website content and verify system and server integrity.

Internet Protocol Addresses are collected by Company to track and aggregate non-personal information. These addresses are collected when you login.

Where we use cookies on our website, you can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.

By continuing to use our website, you are agreeing to our use of cookies.

**(ii) Do Not Track Signals.**

We do not currently respond or take any action with respect to web browser "do not track" signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of information about an individual consumer's online activities over time and across third-party websites or online services.

**(iii) Analytics Services.**

We may use certain third-party analytics services to improve the functionality, features, or delivery of our Service. We may also use these analytics services to record mouse clicks, mouse movements, scrolling activity, as well as any text that you type into our Service. For example, we use Google Analytics on our Service to track user trends and usage. For more information on Google Analytics' processing of your information as it relates to our Service, please see <http://www.google.com/policies/privacy/partners/>. By using a [browser plugin](#) provided by Google, you can opt out of Google Analytics.

**INFORMATION WE COLLECT FROM OTHER SOURCES.**

We may collect information about you from other sources or individuals. For example, we may collect information you submit to a blog, chat, or social network. We may also collect information from other companies, clients, organizations, or third-party partners. Additionally, if you choose to log in to our Services using a social media account, we may receive certain profile information about you from your selected social media provider. Please note that we do not control, and are not responsible for, other uses of your information by your third-party social media provider.

**HOW WE USE YOUR INFORMATION.**

If you submit or we collect information through our Service, then such information may be used to:

- Register and service the user's online account
- Provide, operate, analyze, administer, improve, and personalize the Service
- Process, fulfill, and administer transactions and orders for products and services
- Contact you in connection with the Service, notifications, events, programs or offerings
- Contact you about or in response to a request
- Send you updates and promotional materials
- Advertise or market product or services to you, including to deliver direct mail, email, mobile messages, social media notifications and other electronic marketing communications;

- Provide personalized or interest-based advertising to you
- Conduct market research and analytics
- Process and deliver contest entries and rewards
- Send newsletters, advertisements or other promotional communications
- To administer surveys, give-a-ways, and contests
- Bill and for fraud prevention;
- Protect our rights or our property and to ensure the technical functionality and security of the Service; and
- Comply with applicable law, assist law enforcement, and to respond to regulatory or other legal inquiries.

## **HOW WE SHARE OR DISCLOSE YOUR INFORMATION.**

### **(a) No Sale to Outside Parties**

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information unless we provide you with advance notice, except as described below. The term "outside parties" does not include Petersen. It also does not include website hosting partners and other parties who assist us in operating our website, conducting our business, or servicing you, so long as those parties agree to keep this information confidential. We may also release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property, or safety. However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

### **(ii) Our Third-Party Service Providers.**

We transfer information, to our third-party service providers to perform tasks on our behalf and to assist us in providing our Services. For example, we may share your information with service providers who assist us in performing core functions (such as hosting, marketing, payment processing, technical support, data storage, and security) related to our operation of the Service and/or by making certain interactive tools available to you as a user. We also use third parties for technical and customer support, application development, tracking and reporting functions, quality assurance, and other services. In the performance of our Service, we may share information from or about you with these third parties so that we can deliver the highest quality user experience.

### **(iii) Advertisers.**

From time-to-time, we engage advertising services to assist us in advertising our brand and Service based upon your interests and in order to display

content that is relevant to you (“Interest-Based Advertising”). Those services may target advertisements on our website as well as third-party websites based on cookies or other information indicating previous interaction with our Service. These third parties may collect information from your use of our Services over time and that information may be combined with information collected about you across different websites and online services. These third-party advertisers may be participants in the Network Advertising Initiative and/or the Digital Advertising Alliance, which allow users to opt-out of ad targeting from participating organizations. To learn more about interest-based advertising, or to opt-out of having your information used by certain third parties for behavioral advertising purposes, go to [www.aboutads.info/choices](http://www.aboutads.info/choices) or <http://www.networkadvertising.org/choices/>. Please note that when you opt-out of receiving interest-based advertising, this does not mean you will no longer see advertisements from us.

**(iv) Business Partners.**

From time to time, we may partner with other companies to jointly offer products or services. If you purchase or specifically express interest in a jointly offered product or service from us, we may share information collected in connection with your purchase or expression of interest with our joint promotion partner(s). We do not control our business partners’ use of the information we collect, and their use of the information will be in accordance with their own privacy policies.

**(v) Affiliates**

With affiliates to process, fulfill, or administer transactions ordered by You.  
With affiliates to advertise, market, or promote Petersen Products and services.  
With affiliates to advertise, market, or promote their own products and services.

**(vi) Aggregated or Deidentified Information.**

To better serve our users, business partners, and to improve our Service, we may conduct research on user demographics, interests and behavior or engage in other activities based on identifiable personal information and/or information that we aggregate or de-identify. Aggregated or de-identified information is not considered personal information and does not identify a user personally. We may share this aggregated or de-identified information with our affiliates, agents, business partners, and/or other third parties.

**(vii) In the Event of Merger, Sale, or Change of Control.**

We may transfer or assign this Privacy Policy and any information to a third party entity that acquires or is merged with us as part of the evaluation of an entry into such transactions, or in the course of a merger, acquisition, sale, or other change of control (such as the result of a bankruptcy proceeding).

**(viii) With Your Consent.**

At your direction or request, or when you otherwise consent, we may share your information.

**(ix) Other Disclosures.**

We may disclose information about you if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to: (i) comply with any applicable law, regulation, legal process or governmental request; (ii) enforce our Terms of Use, including investigations of potential violations thereof; (iii) detect, prevent, or otherwise address fraud or security issues; or (iv) protect against harm to the rights, property or safety of us, our users, or the public.

**RETENTION.**

We reserve the right to retain any information as long as it is needed to: (i) fulfill the purposes for which we collected the information, and (ii) comply with applicable law.

**DATA SECURITY.**

We take the protection of your information seriously and take reasonable and appropriate physical, administrative, and technical measures to protect the information collected through our Site. While we implement commercially reasonable security measures to protect your privacy, please keep in mind that the Internet is not a 100% secure medium for communication, and we cannot guarantee that the information collected about you will always remain private when using our Site and/or Services. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk.

**EMAIL COMMUNICATIONS.**

You may choose not to receive future promotional or advertising emails from us by selecting an unsubscribe link at the bottom of each email that you receive from us. Additionally, you may send a request specifying your communications preferences to [SalesInfo@petersenproducts.com](mailto:SalesInfo@petersenproducts.com). You cannot opt out of receiving transactional emails related to the performance of our services. Please

note that even if you opt out of receiving the foregoing emails, we may still send you a response to any "Contact" request as well as administrative, maintenance and operational emails (for example, in connection with a password reset request).

### **CHILDREN'S PRIVACY.**

Our Service is not intended for or directed to individuals under 13 years of age, and we do not knowingly collect any personal information from children under the age of 13. When a user discloses personal information on our Service, the user is representing to us that he or she is at least eighteen (18) years of age.

If you are under 18 and a registered user, you can request that we remove content or information that you have posted to our website or other online services. Note that fulfillment of the request may not ensure complete or comprehensive removal (e.g., if the content or information has been reposted by another user).

### **LINKS TO OTHER SITES.**

Our Site may include links to other third-party websites as a convenience to you. If you click on one of those links you will be taken to websites we do not control, and this Privacy Policy does not apply to those third-party websites. The inclusion of any link does not imply our endorsement of any other company, its site(s), or its product(s) and/or service(s). We are not responsible for the privacy practices or content of any other site.

### **SOCIAL MEDIA, ADS, AND PLUG-INS.**

We engage with guests on multiple social media platforms (e.g., Facebook and Instagram). If you contact us on one of our social media platforms, request guest service via social media, or otherwise direct us to communicate with you via social media, we may contact you via direct message or use other social media tools to interact with you. In these instances, your interactions with us are governed by this privacy policy as well as the privacy policy of the social media platform you use. We may display targeted ads to you through social media platforms and other websites. These ads are sent to groups of people who share traits such as likely commercial interests and demographics.

Our online services may use social media plug-ins (e.g., the Facebook "Like" button, "Share to Twitter" button) to enable you to easily interact with certain social media websites (e.g., Facebook, Twitter, Instagram) and share information with others. When you visit our online services, the operators of the available social media plugins can place a cookie on your device enabling

such operators to recognize individuals who have previously visited our online services. If you are logged into these social media websites while visiting our online services, the social media plugins allow the relevant social media websites to receive information that you have visited our online services or other information. The social media plugins also allow the applicable social media websites to share information about your activities on our online services with other users of the social media website. For example, Facebook Social Plugins allow Facebook to show your "Likes" and comments on our online services to your Facebook friends. Facebook Social Plugins also allow you to see your friends' Facebook activity on our online services. We do not control any of the content from the social media plugins.

#### **CALIFORNIA SHINE THE LIGHT LAW.**

If you are a California resident, you may request that we provide you with certain information about the entities with which we have shared your personal information, if any, for the entities own direct marketing purposes during the preceding calendar year. To do so, please write to us at Petersen Resources, PO Box 0340, Fredonia, WI 53021.

#### **CHANGES TO THIS PRIVACY POLICY.**

As our organization changes over time, this Privacy Policy may change as well. We reserve the right to amend the Privacy Policy at any time, for any reason, without notice to you, other than the posting of the amended Privacy Policy on our Service. We will provide you notice of material changes by indicating that the Privacy Policy has been updated on our homepage and will indicate the date we made the update above. Your continued use of any of the Services after the changes have been made will constitute your acceptance of the changes. Please therefore make sure you read any such notice carefully. If you do not wish to continue using the Services under the new version of the policy, please cease using the Services.

#### **CONTACTING US.**

Any comments, concerns, complaints, or questions regarding our Privacy Policy may be addressed to [SalesInfo@petersenproducts.com](mailto:SalesInfo@petersenproducts.com). Please note that email communications may not be secure. Accordingly, you should not include personal or other sensitive information in your email correspondence.

## **GDPR COMPLIANCE STATEMENT**

Petersen Resources, LLC ("**Company,**" "**Petersen,**" "**we**" "**our**" or "**us**") welcomes the General Data Protection Regulation ("GDPR"). We know how important data protection is to our customers, and our customers are very important to us. We are here to help. We want you to know that we are taking the GDPR requirements very seriously, and that we have worked hard to ensure that our privacy standards provide appropriate protection. We have created this GDPR Compliance Statement to explain our approach to implementing Company's GDPR compliance program.

### **WHAT IS THE GDPR AND WHY IS IT RELEVANT?**

The GDPR is a European Union ("EU") regulation that imposes more stringent requirements on companies that collect, store or process the personal data of EU residents. Any company that holds personal data of EU residents is accountable under the GDPR, regardless of the company's physical location. It's worth noting that the definition of "personal data" under the GDPR is very broad, and effectively covers any information that may identify an individual. The GDPR is effective from May 25, 2018, and Company has put its GDPR compliance program in place.

In this Statement, Petersen Products Co. illustrates how it processes the data of users who visit the website and how the cookies work, which are installed by the website itself. This GDPR Compliance Statement is drawn up in accordance with article 13 of the GDPR 2016/679 (GDPR Recommendation no. 2/2001 of the Working Party, ex art. 29), article 14 and article 28 of the GDPR.

#### **(i) Company's Commitment: What are we doing to protect you?**

We value our customers' success and understand the importance of knowing that personal data is being protected. That's why we, despite already having a top level of security and data protection, are nonetheless working hard to provide an even greater level of protection to our customers.

Company hired outside privacy counsel to work closely with us to ensure complete GDPR compliance. We worked with our privacy counsel and internal teams to create a GDPR compliance policy that addresses each relevant requirement that Company must comply with. To this effect, Company is addressing the GDPR requirements that are applicable to data processors.

The information given to you by Company concerning technical, legal or professional aspects of GDPR is for guidance only and does not constitute legal

or professional advice. Always consult legal counsel on any specific legal problem or matter. We assume no responsibility for such information contained in any information provided relating to GDPR and disclaim all liability in respect of such information.

## **(ii) Information on Data Processor**

The Data Processor is Petersen, located at 421 Wheeler Ave, Fredonia, WI 53021. To exercise the rights provided for by the legislation and better specified above, contact Petersen at its registered office or by phone at 800-827-5275 or by writing to [SalesInfo@petersenproducts.com](mailto:SalesInfo@petersenproducts.com). The following applies strictly to the website [www.petersenproducts.com](http://www.petersenproducts.com); The Petersen is not responsible for data inserted and cookies installed by any other websites consulted through the links.

## **(iii) Purpose and legal basis of processing**

Petersen processes the data provided by users through the website for the following purposes:

- Fulfillment of obligations provided for by the law, a regulation or EU legislation

The provision of data for these purposes is mandatory, and the legal basis of the processing is the fulfillment of a legal obligation to which Petersen is subject, as established by article 6, paragraph 1, lett. c) of the GDPR. The user's consent is not necessary to process personal data for said purposes. The processed data is stored for the period provided for by the reference legislation.

- Statistical analysis of aggregate or anonymous data

Said processing does not allow the identification of the user, but simply seeks to verify the suitability of the web marketing campaigns adopted and/or the correct operation of the website, measuring the user traffic it generates. The processing of aggregate or anonymous data, which does not allow user identification, does not fall within the field of application of personal data protection legislation and therefore no consent is required for its processing.

- Request for information, contact and support

The provision of the requested data is necessary in order to provide a response to your request. The legal basis of the processing is indicated by article 6, paragraph 1, lett. b) of the GDPR and is the fulfilment of a contract of which the Data Subject is a part, or the fulfilment of precontractual measures adopted further to the request of the Data Subject, as well as by article 6, paragraph 1,

lett. f) and is the pursuit of the legitimate interest of the Data Controller or third parties. The data processed and relative to your request will be stored by us, based on its content.

- Registration in reserved area

The provision of the requested data is necessary in order to allow you to access the reserved area. The legal basis of the processing is indicated by article 6, paragraph 1, lett. b) of the GDPR and is the fulfilment of a contract of which the Data Subject is a part, or the fulfillment of precontractual measures adopted further to the request of the Data Subject. The data processed and relative to your registration will be stored by us until you request its cancellation and unsubscribe.

- Soft spam

The Data Controller may use the email address provided in direct sales campaigns to send periodic promotional communications (newsletters) concerning similar products or services to those purchased, unless objected to by the user (by selecting the specific paragraph below or even at a later stage). The legal basis of the processing is the legitimate interest of the Data Controller based on the balancing of interests already implemented by current legislation. Data for the purposes of soft spam will be processed and stored by us for 7 years.

- Sending of newsletters and marketing

The provision of the requested data to subscribe to our newsletter and/or be able to send communications and promotional material is entirely optional and the legal basis of this processing is the express consent of the Data Subject for the processing of their personal data. Data for promotional and marketing purposes will be processed and stored by us for 7 years.

- Processing methods, automated decision-making methods and data retention periods

Your data is processed using electronic means, without excluding the possibility of manual processing. Automated decision-making processes are not used to process your personal data. Data collected through cookies is stored for the period of time established by the individual cookie.

- Communication of data (Recipients)

To guarantee the operation of our website and the fruition of its contents, we may use third-party suppliers such as IT service providers, hosting companies, communication companies. Moreover, in order to guarantee the requested

service, for example if products or the like are purchased, we may also make use of additional third-party suppliers (couriers, retailers, etc.). The legal basis of the communication is the fulfillment of contractual and regulatory obligations, as well as fulfillment of the precontractual measures adopted further to your request. It is understood that we only communicate to the Recipients the data strictly necessary in order to fulfill the service, opting where possible for the anonymization of data. The data provided by you will not be disclosed without your specific and prior consent. See the specific section for information concerning third-party cookies.

**(iv) Transfer of data to third countries or international organizations**

Data communicated by you may be transferred to third countries and/or non-EU international organizations to our retailers and commercial partners. The transfer is legitimated by the presence of an adequacy decision, or in its absence, by subscription to safeguards, which constitute adequate guarantees. The website hosting is within the United States of America.

**(v) Rights of the Data Subject and claims to the Data Protection Authority**

You have the right to request, at any time, access to your personal data, its modification, integration or cancellation, restriction and to object to its processing in the presence of legitimate reasons, as well as the portability of said data to another Data Controller. We will provide a written response within 30 days. You may, at any time, revoke any consent provided on this website by making contact using any of the contact details in this Privacy Policy.