

Privacy Statement

Last updated May 27, 2020

Your privacy and trust are important to us. This Statement explains how Pure Safety Group, Inc. ("PSG" "we", "us" or "our") collects, handles, stores and protects personal information about you in the context of our services, including your use of this website. It also provides information about your rights and about how you can contact us if you have questions about how we handle your information. This statement provides adequate transparency into how we obtain, store, transmit, share, and use the personal information you provide. It also provides information about your rights and about how you can contact us if you have questions about how we handle your information.

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Who this statement applies to

This Statement applies to individuals who use our website or interact with us in relation to products and services provided by us (we call these our "Services").

Within our Services, there may be links to third-party websites or applications. We are not responsible for the content or privacy compliance of third-party websites or applications. You should check those websites or applications for their privacy statements and terms that apply to them.

Children's Privacy. PSG provides Services for adults. Our Services are not aimed at children and we do not intentionally collect minors' personal information.

Sources of personal information and why we collect it

On this website we typically collect two kinds of information about you: (a) information that you provide which personally identifies you; and (b) information that does not personally identify you which we automatically collect when you visit this website or that you provide us.

The personal information we collect is for one of the following reasons:

- You have made an information request to us – When you request information from us, such as a whitepaper, survey, or other resource, with your consent we may also capture your personal information for later use in sharing information about our products and services.
- You wish to attend, or have attended, an event - Information we collect about you comes from our direct interactions with you. When you register for an event we may collect information (online or offline) in relation to the event organization, and during an event, such as participation in sessions and survey results.
- You subscribe to our newsletter - PSG has regular email communications that we send to clients and other interested parties. These are opt-in only and you must complete our request form in order to opt-in.
- You are representing your organization - In our relationship with clients or prospects, partners and suppliers, they also provide us with business contact information (such as name, business contact details, position or title of their employees, contractors, advisors and authorized users) for purposes such as contract management, fulfillment, delivery of products and services, provision of support, invoicing and management of the services or the relationship.
- IP Addresses: An IP address is a number that is automatically assigned to your computer whenever you are surfing the Internet. Web servers automatically identify your computer by its IP address. When visitors request pages from this website, 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 this website. We reserve the right to use IP addresses and any personally identifiable information to identify a visitor when we feel it is necessary to enforce compliance with this website's 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, this website, or other users; or (d) in an emergency to protect the health and safety of this website's users or the general public.

- The Website permits you to use a third party social networking platform such as Facebook, Twitter, LinkedIn, and Instagram. These plug-ins allow you to follow us on those services. When you use social networking platforms and plugins, you share your information with them and their privacy notice applies to their disclosure of such information. In addition, they may be able to collect information about you, including your activity or may notify your connections on the social networking platform about your use of our Website. Such services may allow your activity to be monitored across multiple websites for purposes of delivering more targeted advertising. Please note that their own privacy policies apply and we encourage you to read them. We may add new social networking plugins and buttons to our Website from time to time.

The personal information we collect consists of the following:

- Name and contact data, such as first and last name, email address, postal address, phone number, and other similar contact information
- Account credentials, such as passwords and other security information for authentication and access
- Device information, such as information about your device (such as IP address, location or provider)
- Usage information and browsing history, such as information about how you navigate within our Services, your browsing history, and which elements of our Services you use the most

Our servers, logs and other technologies automatically collect system/device and usage information to help us administer, protect and improve our Services, analyze usage and improve users' experience. When visiting our websites or using our Services we may provide you with personalized information. See more information regarding cookies and similar technologies below.

How we use personal information

Some laws require us to explain our lawful reason for processing your personal information.

We process personal information about you on the basis that it is:

- where you give us your consent: we only ask for your consent in relation to specific uses of personal information where we need to, and, if we need it, we will collect it separately and make it clear that we are asking for consent

- for legitimate interests: in specific situations, and where we have assessed the appropriateness of this lawful basis, we may process data based on legitimate business interests pursuant to a Legitimate Interest Assessment that we conduct. Details of those legitimate interests are set out in more detail below.
- necessary for the performance of a contract: where we have a contract with you, we will process personal information in order to fulfill that contract
- for compliance with a legal obligation (e.g., to respond to a court order or a regulator)

You can choose to receive information about our products and services or sign up for subscriptions. In these instances, we may request your consent for processing.

Where we reference that we use your personal information in connection with a request, survey, or to provide you with Services that you requested, we do this based on your consent or because it is necessary for the performance of an agreement with you.

Where we reference that we use your personal information in relation to marketing, improvement or development of our website or services, for reasons of safety and security, or regulatory requirements other than in connection with your agreement or request, we do this on the basis of legitimate interests. We may assess the personal information we collect to develop aggregate analysis and business intelligence for conducting our business and for marketing purposes.

You are welcome to contact us for further information on the legal grounds that we rely on in relation to any specific processing of your personal information. Under certain laws you also have the right to object to or modify the way in which your personal information is processed. Details on these rights and how to contact us is included below under "Contact Us".

How and with whom we share your data

We may share your information as required by law, to comply with legal process, to protect our legal rights, to protect the safety or security of a person, or to protect against fraud, criminal acts, or misconduct. We reserve the right to disclose any personally identifiable information or non-personal information about you if we are required to do so by law, with respect to copyright or 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, this website, or other users; or (d) in an emergency to protect the health and safety of this website's users or the general public.

In certain instances, we may also share your personally identifiable information with our third-party vendors performing functions on our behalf (or on behalf of our affiliated companies), e.g., vendors that process credit card payments, and other companies that provide marketing or promotional assistance, analyze our data, assist us with customer service, etc. Our vendors agree to use this information, and we share information with them, only to carry out our

requests. Regardless of how you interact with PSG we do not sell or rent ANY information collected to any third parties.

These third parties have access to your personal information only to perform these tasks on our behalf and are obligated to maintain appropriate protections and not to disclose or use it for any other purpose.

As we continue to develop our business, we may buy or sell businesses or assets. In such transactions, confidential customer information generally is one of the transferred business assets. In the event of a transaction involving the sale of some or all of our businesses, customer and site visitor information may be one of the transferred assets and may be disclosed in connection with negotiations relating to a proposed transaction. In such case, the transferred information may become subject to a different privacy notice.

How we safeguard personal information

We apply appropriate safeguards to protect the privacy and security of your personal information and to use it only consistent with your relationship with us and the practices described in this privacy policy. PSG takes the security of personal information seriously and we use appropriate technologies and procedures to protect personal information (including administrative, technical and physical safeguards). While we strive to protect your personally identifiable information and privacy, we cannot guarantee or warrant the security of any information you disclose or transmit to us online.

Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. Except as specifically stated, this site does not use security encryption measures. Information that you disclose by use of this site (as with any site that is non-secure), by posting a message or using e-mail, potentially could be collected and used by others. This may result in unsolicited messages from third parties or use of such information by third parties for their own purposes, legal or illegal. As a result, while we strive to protect your personal information, we cannot ensure or warrant the security of any information you transmit to us or from our services, and you do so at your own risk. Once we receive your transmission, we use commercially reasonable efforts to ensure its security on our systems.

How we store and delete personal information

We will not retain personal information longer than necessary to fulfill the purposes for which it is processed, including the security of our processing, complying with legal and regulatory obligations (e.g. audit, accounting and statutory retention terms), handling disputes, and for the establishment, exercise or defense of legal claims.

How we use cookies and similar technologies

Cookies are sent to your browser from a website and stored on your device for the purpose of enhancing the quality of your experience. Cookies are files that contain a small amount of data

that may include an anonymous unique identifier. We use cookies and similar technologies to track your activity on our website and hold certain information.

The use of cookies and associated technologies is standard across websites and apps through which information is collected about your online activities across applications, websites, or other services. More information about how we use cookies and similar technologies and how you can control and manage them is below.

Our cookies types and why we use them:

- **Performance and Analytics cookies:** These cookies collect information about how you use our websites. Information collected includes, for example, the Internet browsers and operating systems used, the domain name of the website previously visited, the number of visits, average duration of visit, and pages viewed. These cookies only collect information in an aggregated format. Performance cookies are used to improve the user-friendliness of a website and enhance your experience. Analytics cookies allow web analytics services to recognize your browser or device and, for example, identify whether you have visited our Website before, what you have previously viewed or clicked on, and how you found us. Analytics cookies may collect information about your location. This information is provided anonymously for statistical analysis only. Analytics cookies are usually persistent cookies.
- **Functionality cookies:** These cookies allow the website to remember choices you make (such as your username or ID, language preference, or the area or region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts, and other customizable parts of web pages. They may also be used to provide services you have asked for, such as watching a video or commenting on a blog. These cookies cannot track your browsing activity on other websites.

How do I change my cookie settings?

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service. You can manage website cookies in your browser settings, and you always have the choice to change these settings by accepting, rejecting, or deleting cookies. If you choose to change your settings, you may find that certain functions and features will not work as intended on the Services. All browser settings are slightly different, so to manage cookies, you should refer to the relevant settings within your browser.

Remember, also, that disabling cookies is browser specific. If you log on using Google Chrome, you must also disable cookies in Safari if you use that browser at a different time.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set, visit www.allaboutcookies.org.

Find out how to manage cookies on popular browsers:

- [Google Chrome](#)
- [Microsoft Edge](#)
- [Mozilla Firefox](#)
- [Microsoft Internet Explorer](#)
- [Opera](#)
- [Apple Safari](#)

To find information relating to other browsers, visit the browser developer's website.

To opt out of being tracked by Google Analytics across all websites, visit <http://tools.google.com/dlpage/gaoptout>.

Your rights

Under data protection laws, you have rights we need to make you aware of. We will honor your rights under applicable data protection and privacy laws. You have the following rights under European laws and may have similar rights under the laws of other countries.

- Right of subject access: The right to make a written request for details of your personal information and a copy of that personal information
- Right to rectification: The right to have inaccurate information about you corrected or removed
- Right to erasure ('right to be forgotten'): The right to have certain personal information about you erased
- Right to restriction of processing: The right to request that your personal information is only used for restricted purposes
- Right to opt out of marketing: You can manage your marketing preferences by unsubscribe links found in the communications you receive from us or by visiting the applicable preference center
- Right to object: The right to object to processing of your personal information in cases where our processing is based on the performance of a task carried out in the public interest or we have let you know the processing is necessary for our or a third party's legitimate interest
- Right to data portability: The right to ask for the personal information you have made available to us to be transferred to you or a third party in machine-readable format
- Right to withdraw consent: The right to withdraw any consent you have previously given us to handle your personal information. If you withdraw your consent, this will not affect the lawfulness of our use of your personal information prior to the withdrawal of your consent

These rights are not absolute, and they do not always apply in all cases. In response to a request, we will ask you to verify your identity if we need to, and to provide information that helps us to understand your request better.

To object to or modify the way in which your personal information is processed, or to opt out, please contact us using the information below.

Please provide us with your exact name, email address and physical address and indicate the update you wish us to make. You can provide this information using the contact information below.

For our friends in California

This Privacy Notice for California Residents supplements the information contained in above in our general privacy policy and applies solely to visitors, users, and others who reside in the State of California.

California Civil Code Section 1798.83 permits our visitors who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email or written request at the address below. Make sure to state that you are a California Resident.

In addition, a business subject to California Business and Professions Code Section 22581 must allow California residents under age 18 who are registered users of online sites, services, or applications to request and obtain removal of content or information they have publicly posted. Your request should include a detailed description of the specific content or information to be removed. Please be aware that your request does not guarantee complete or comprehensive removal of content or information posted online and that the law may not permit or require removal in certain circumstances. As stated above, persons under the age of 18 are not permitted to use the Website.

Our Website does not support Do Not Track (DNT) codes.

California Consumer Privacy Act

Your Rights

The California Consumer Privacy Act ("CCPA") grants State of California residents the following rights, to:

- 1) Know what personal information is being collected about them;
- 2) Know whether their personal information is sold or disclosed and to whom;
- 3) Say no to the sale of their personal information;
- 4) Access their personal information;
- 5) Have their personal information deleted; and

- 6) Have the right to equal service and price, even if they exercise their privacy rights under this law.

Categories of Personal Information We Collect

We collect information that identifies you, your household or your device or is reasonably capable of being connected with or linked to you, your household, or your device ("Personal Information"). Personal information does not include public information available from government records, de-identified or aggregated information or information that is protected by certain laws such as HIPAA for health related information and the Gramm-Leach Bliley Act (GLBA) for certain financial information.

We collect the following categories of Personal Information:

- Identifiers
 - First and last name
 - Email address
 - Company
 - Industry Type
 - Country
 - Shipping address
 - State/Region
 - City
 - Telephone
 - Account identifiers and passwords
 - Security information
 - Internet Protocol (IP) Address
- Personal Information Listed in the California Customer Records Statute
 - The above identifiers
- Characteristics of Protected Classifications
 - Not collected
- Commercial Information
 - Information about your request for product quotes
- Biometric Information
 - Not collected.
- Internet or Other Electronic Network Activity Information
 - Cookies
 - Domain name
 - Browser type
 - Operating system
 - Usage data
 - Browsing history
 - Elements of our Services that you use the most

- Geolocation Data
 - Information that tells us from where you access our website
- Sensory Data
 - Not collected
- Professional or Employment-Related Information
 - Not collected
- Non-public Education Information
 - Not collected
- Inferences Drawn from Other Personal Information
 - Products and services of interest to you and your company

Categories of Sources of Personal Information

We collect information from the following categories of sources:

- Directly from you. For example when you sign up for an email newsletter or request a quote.

How We Share Your Personal Information

We share information in each of the above categories as follows:

- All categories of information
 - We will share information in all of the above categories if our company is sold or we engage in a merger or other such transaction.
 - We will share information in all of the above categories of information in connection with a law enforcement request that is compliant with the California Electronic Communications Privacy Act.
- Identifiers
 - We share identifiers with service providers who use that information only to provide services to us such as website development and operating, sending postal mail or email, communicating with you about offers from our company and our marketing partners, analyzing website use, processing payments, processing requests for financing and processing data.
- Personal Information Listed in the California Customer Records Statute
 - We share this information with service providers for payment services, payment processing and financing services.
- Internet or Other Electronic Network Activity Information
 - We share this information with our data analytics providers

How We Use and Disclose Your Information

See "How we use personal information" above to learn how we use your information. We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

How We Retain and Store Your Personal Information

We retain your personal information for as long as necessary to fulfill the purpose(s) for which we collected it and to comply with applicable laws. We use reasonable security precautions to protect your information while in storage including Payment Card Industry Data Security Standard protocols described above for payment transactions.

Requests to Know

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- 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.

Requests to Delete

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise performing our contract with you. This

includes fulfilling a shipping transaction or request, processing an overcharge claim, and processing a cargo claim.

2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug online services to identify and repair errors that impair existing intended functionality.
4. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
5. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
6. Comply with a legal obligation.
7. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

How To Submit a Request to Know or a Request to Delete

To request this information please submit a verifiable consumer request to us by either:

- Calling us at 1-800-466-6385 or
- Emailing us privacy@puresafetygroup.com and asking for a Consumer Request Form

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. To designate an authorized agent, email us at privacy@puresafetygroup.com and we will provide you with a form to make a designated agent request.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. To make a request, you must:

- Call or email us to receive a CCPA Consumer Request Form
- Complete the CCPA Consumer Request Form
- Provide sufficient information that allows us to reasonably verify that you are the person about whom we collected personal information or that you are an authorized representative
 - If you request the categories of information we collect, we require your first and last name and your email address.
 - If you request the specific information or to have your information deleted, we require your first and last name, email address and information about your two most recent transactions with us.

- Describe your request with sufficient detail that allows us to understand, evaluate and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

We will try to respond to your request within forty-five (45) days of when we receive it. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance, specifically by electronic mail communication.

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.

An amendment to the CCPA provides an exemption to the Right to Know and Right to Delete for personal information between a business and a person who is acting as an employee, director, officer, or contractor of a company, partnership, sole proprietorship, nonprofit, or government where the information is used in the context of a business transaction. This exemption is currently set to expire on January 1, 2021. Until that date, we will not respond to requests to know or delete that meet this exemption.

How To Submit an Opt-Out Request

We do not and will not sell your personal information to third parties. If we change that practice in the future, we will update our privacy policy and provide an opt-out link pursuant to the CCPA. We will treat any information that we collected prior such a change as though you opted-out of the sale of your personal information.

Non-Discrimination

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

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that **can result** in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

How to contact us

You may contact us as provided below if you: (a) have questions or comments about our Privacy Statement; (b) wish to make corrections to any personally identifiable information you have provided; or (c) want to opt-out from receiving future promotional correspondence, including emails, from us or our affiliated companies.

Privacy Office
Director of IT
Pure Safety Group
607 Sam Houston Pkwy. S., Ste 800
Pasadena, TX 77503

Phone: 1-800-466-6385
Email: privacy@puresafetygroup.com

Please include your name, street address, city, state, and zip code (your street address is optional if you wish to receive a response to your request via email). We will not accept requests via the telephone or by fax. We are not responsible for notices or requests that are not labeled or sent properly, or do not have complete information.

Changes to this privacy notice

We may update this Privacy Statement from time to time. We encourage you to periodically review [our website](#) for the latest information on our privacy practices.