

## **Privacy & Security Policy**

R.E. Michel Company, LLC and its affiliates (“REM”) is the owner of the information collected on its websites. REM does not sell, share or rent this information to others.

REM collects information from the User at several different points on the websites; including, but not limited to, registration and the online ordering pages. The information collected is voluntarily submitted by the User; such information includes, but is not limited to name, phone number, job/PO information, address, email address, and/or credit card / account information.

The information is used for the purpose of REM providing User specific pricing, product orders, and/or product recalls.

When User places an order, REM requests contact and credit card information. This information is used strictly for billing purposes and to successfully complete and fill orders. If REM should have trouble processing an order, the contact information is used to get in touch with User.

When the User registers and submits contact information including but not limited to email address, phone, fax or mail, REM may use this information to communicate with User about REM promotions and industry related information. REM uses MailChimp to aid in the communication. Please refer to MailChimp’s privacy policies for the full extent of their data collection and opt out procedures. User may opt out with REM any time by sending REM an email to remove User information from REM marketing communications at [marketing@remichel.com](mailto:marketing@remichel.com).

REM uses Google Analytics which is a web analysis service by Google, Inc (“Google”). Google monitors traffic flow into REM websites while collecting data including but not limited to customer locality (city, state), internet browser, internet device, pages views and time spent on the site. Please refer to Google’s privacy policies for the full extent of their data collection and opt out procedures.

REM takes strong precautions to protect User information. REM uses a variety of technical solutions to make shopping safe at REM websites. User information is encrypted and is protected by industry-standard Secure Sockets Layer (SSL) software. While REM uses SSL encryption to protect sensitive information online, REM also protects User information offline. All of User’s information is maintained in a restricted section. Only REM associates who need the information to perform a specific job

function (for example, customer service representatives) are granted access to personally identifiable data.

No credit card information is stored with REM or shared with REM associates. All credit card information is processed through TSYS, a payment processing merchant, who is responsible for abiding by PCI security standards.

REM websites often contain links to other sites of interest. REM is not responsible for the privacy practices of other sites User may visit.

From time to time REM may modify and revise this privacy and security policy. Please regularly check back to review any possible changes.

User may request details of User’s personal information held by REM under the Data Protection Act of 1998 by contacting R.E. Michel Company, LLC, Attention: Legal, 1 R.E. Michel Drive, Glen Burnie, MD 21060.

### **R.E. Michel Company, LLC California Residents**

The Privacy Policy for California Consumers is in addition to and supplementary to the general Privacy and Security Policies of REM

Under the California Consumer Privacy Act (the CCPA) residents of the state of California have the following rights:

User has the “Right to Know” or the “Right to Access Information About Collection, Disclosure and Sale of your Personal Information” over the past 12 months.

#### Collection of Information:

Categories of Information	Examples of Information Collected
Identifiers	Your real name, your postal address, your e-mail address, postal address, unique personal identifier, online identifier, Internet Protocol address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.

Personal Information listed in Cal. Civ. Code § 1798.140(o)(1)(B), 1798.80(e)	Your name, your signature, your address, your telephone number, your employment, your credit card number, your debit card number. Some personal information included in this category may overlap with other categories.
Characteristics of Protected Classifications Under California or Federal Law	Your age, your gender, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).
Internet or other Electronic Network Activity Information	Browsing history, search history, information regarding your interaction with an Internet website, application, or advertisement
Geolocation Data	Physical location or movements
Biometric information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.

REM collects personal information from the following categories of sources:

- Directly from User or User’s agents. For instance, when User provides name and credit card for a transaction.
- Indirectly from User or User’s agents. For instance, through information REM collects from User in the course of providing goods or services.
- Directly and indirectly from activity on REM website. For instance, when User signs up for an account on REM website or website usage details collected automatically.

REM collects the categories of personal information listed above for the following business or commercial purposes:

- To fulfill the reasons for which the information was provided. For instance, if User provides REM an email address to sign up for an online account, REM will use that information to create and maintain the account.
- To provide User with information, products, or services that User requests from REM. For instance, if User provides REM with an email address to inquire about REM general terms and conditions, REM will use that information to respond to the User's inquiry.
- To provide User with email alerts, event registrations, promotional offers, and other notices concerning industry related products, services, events or news that may be of interest to the User.
- To carry out REM obligations and enforce REM's rights arising from any agreements entered into between User and REM, including purchases, billing, and collections.
- To improve REM's website, mobile application, store experience, and product development.
- For testing, research, analysis, and product development.
- As described to User when collecting User personal information or as otherwise permitted by the CCPA

REM does not disclose or sale personal information to third parties for business or commercial use.

Your Rights Under the CCPA

1. User has the right to request that REM disclose to you: (1) the categories of personal information it has collected about User; (2) the categories of sources from which the personal information is collected; (3) the business or commercial purpose for collecting or selling the personal information; (4) the categories of third parties with whom REM shares personal information; and (5) the specific pieces of personal information it has collected about User. Instructions for submitting a request to know can be found below
2. User has a right to request the deletion of User's personal information collected or maintained by REM. Instructions for submitting a request to delete can be found below.
3. User has a right not to receive discriminatory treatment for User's exercise of Your rights under the CCPA. Prohibited discriminatory treatment would include but is not limited to denying goods or services to User, providing a different level or quality of goods or services to the customer; suggesting that User will receive a different price or rate for goods or services or a different level or quality of goods or services. However, REM is not prohibited from charging User a different price or rate, or from providing a different level or quality of goods or services to User, if that difference is reasonably related or directly related to the value provided to User by User's personal information.

User may request details of personal information which we hold about you under the CCPA. Please contact R.E. Michel Company, LLC, **Attention: Legal**, 1 R.E. Michel Drive, Glen Burnie, MD 21060

A verifiable consumer request, as defined in the CCPA and regulations adopted by the Attorney General, means a request that is made by User, by User on behalf of User's minor child, or by a natural person or person registered with the California Secretary of State that User authorizes to act on User's behalf, and that REM can reasonably verify to be the User about whom REM has collected personal information. REM is not obligated to provide information to User in response to a request for disclosure if REM cannot verify that the User making the request is the User about whom REM has collected information or is a person User authorized to act on User's behalf.

User may only make a verifiable consumer request twice in a 12-month period. Making a verifiable request does not require User to create an account with REM. For requests of disclosure, if REM cannot verify the requester's identity from the information already maintained by REM, REM may request additional information from User, which shall be

used only for the purposes of verifying the requester's identity and for security or fraud prevention purposes.

For requests to delete, if REM cannot verify the requester's identity, REM may deny the request to delete, and will inform the requester that their identity cannot be verified, and that the request will be treated as a request to opt out of sale.

REM will strive to respond to verifiable User requests within 30 days of receipt. If REM requires additional time, REM will provide User with a notice and explanation for why additional time is needed. If REM does not take action in response to a request, REM will inform User within 30 days of receipt of the reasons for not taking action and any rights User may have to appeal the decision to us.

If a request is manifestly unfounded or excessive, REM may either charge User a reasonable fee or refuse to act on the request and notify User of the reason for refusing the request.

In response to a verifiable User request for disclosure, REM disclosure will cover the 12-month period preceding REM's receipt of the request and will be made in writing and delivered through User's account with REM, if available, or by mail or electronically, at User's option.

In response to a verifiable User request to delete, REM will permanently and completely erase the personal information on our existing systems with the exception of archived or back-up systems; de-identifying the personal information; or aggregating the personal information. REM will specify the manner in which REM has deleted the personal information and will notify User that REM will maintain a record of your request pursuant to the CCPA's requirements.