

RIPLEY TOOLS PRIVACY POLICY

Effective May 8, 2018

At Ripley (Ripley Tools LLC and its subsidiaries Ripley Europe Limited, Shanghai Ripley Hardware Tools Co., Ltd., and Ripley ODM LLC) we know you care about your personal privacy. Because we care, we have adopted the practices described in this Privacy Policy in relation to information that we collect through websites operated by us, through our social media pages, and other services provided by us both online and offline; as well as through HTML-formatted email messages (collectively, the “Sites”) that we send to you that link to or reference this Privacy Policy.

Ripley and its affiliates may share this personal information with each other and use it consistent with this Privacy Policy. They may also combine it with other information to improve our products, services, content, and advertising. You should not access the Ripley website (the “Sites”) or use our services until you have carefully read this Privacy Policy and agree to the terms and conditions described in it.

Ripley is committed to be transparent about the data we collect about you, how it is used and with whom it is shared as described in this Privacy Policy and our Cookie Policy.

Table of Contents

1. Data We Collect & Use of Your Personal Information
2. Restrictions on Disclosing Information to Third Parties
3. Security Procedures to Protect Information
4. Inapplicability of Privacy Policies of Any Linked Sites or Other Parties
5. Terms of Use, Notices and Changes to Our Privacy Policy
6. Other Important Information

1. Data We Collect and Use of Your Personal Information

We collect and use information about you which will help us administer our business or provide products, services or other opportunities to you. Among other things, we use the information we learn about you to help us personalize and improve the experience you have on our website, to respond to your requests and to communicate with you. The types of information we collect, retain and use include the following:

1.1 Site Use Information: In general, you can visit the Site without telling us who you are or revealing any information about yourself. Our web servers collect the domain names, not the email addresses, of visitors. This information is aggregated to measure the number of visits, average time spent on the Site, pages viewed, etc. Ripley utilizes this information (“behavior profiles”) to measure the use of our Site and to improve the content we offer.

1.2 Registration Information You Provide To Us:

Visitors: If and when you register on our site to receive news from Ripley, we collect profile information from you (“Personally Identifiable Information”). We may require that you provide your first and last name, email address, and other information as requested in the applicable registration pages. At your option you may voluntarily provide additional information, including business name, website, address, telephone number and fax number. Although you may choose not to provide the optional information to us, it may result in some features not being available to you.

By providing this Personally Identifiable Information to us, you explicitly agree to our collection and usage of such information as described in this Privacy Policy. We use your Personally Identifiable Information to respond to your inquiries, process an order, contact you regarding account status or customer service, ask you for feedback on our service, let you know about products or services which may be of interest to you, or allow you to access specific account information. When you register, you consent to allow us to contact you for those purposes.

Direct Customers: Ripley sells business to business, if you are a direct customer (i.e. distributor) we collect your business information via email orders, the information we collect from those ordering directly from us may include name, telephone number, email address, business address and bank details. We will collect this information via a third-party email encryption service, and we may use this data to send you the products you have ordered from us, price list updates, customer satisfaction surveys and marketing emails.

1.3 Social Media Pages: Personally Identifiable Information may also be disclosed to you through the Sites, on message boards, chat, profile pages and blogs and other services to which you are able to post information and materials. This information may appear in public ways, such as through search engines or other publicly available platforms and may be searched by third parties. Please do not post any information that you do not want to reveal to the public at large.

1.4 International or Cross-Border Transfer of Data: We may store and use your data outside your country.

We process data both inside and outside of the United States and rely on legally-provided mechanisms to lawfully transfer data across borders. Countries where we process data may have laws which are different, and potentially not as protective, as the laws of your own country.

Your Personally Identifiable Information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using the Sites or disclosing information to us you consent to the transfer of information to countries outside of your country of residence, which may have different data protection rules other than those of your country in which you are located when you initially provided information.

1.5 Cookies: Like many websites we use "cookies" to enable us to remember your password, to help us identify the portions of our Site that may be the most relevant for your needs, and to help us identify other products or services that may be of interest to you or others. A cookie is a small piece of information that a web site can store on your web browser and then retrieve at a later time. We use cookies to track the portions of our Site you visit. However, we do NOT use cookies to examine your surfing behavior before or after you leave our Site. There are products commercially available that are designed to help you disable cookies. Although we want you to be aware that such products exist, please note that if you choose to use them we will not be able to provide you with a personalized service, and it may result in certain features and services not being available to you.

We may use third party vendor remarketing tracking cookies, including Google Adwords, to advertise across the Internet. Google Adwords remarketing will display relevant ads tailored to you based on what parts of your website you have viewed by placing a cookie on your machine. The cookies are used to serve ads based on your prior visits to our website. Google Adwords allows us to tailor our marketing to better suit your needs and only display ads that are relevant to you. We respect your privacy and are not collecting any identifiable information through the use of Google's or any other third party remarketing system. If you do not wish to participate in our Google Adwords Remarketing, you can opt out by visiting Google's Ad Preferences Manager.

1.6 Email Communications: We may use your email address to contact you to respond to your inquiries or to provide information on products or services to you. To help us determine whether you have received an email

from us, and to help us make emails more useful and interesting, we may receive a confirmation that you have opened an email from us. Every email will offer an opt-out choice.

1.7 Child Privacy: We do not knowingly solicit or receive information from children under the age of 18.

2. Restrictions on Disclosing Information to Third Parties

2.1 Disclosing Information to Third Parties

We are not in the business of selling your Personally Identifiable Information to others. We do not reveal Personally Identifiable Information about you to unaffiliated third parties, unless: (1) you request or authorize it; (2) the information is provided to help complete a transaction for you; (3) the information is provided to comply with the law, applicable regulations, court orders or subpoenas, to enforce our Terms of Use or other agreements, or to protect our rights, property or safety or the rights, property or safety of our users or others (e.g., to a consumer reporting agency for fraud protection etc.); (4) the disclosure is done as part of a purchase, transfer or sale of services or assets (e.g., in the event that substantially all of our assets are acquired by another party, customer information may be one of the transferred assets); or (5) the information is provided to our agents, outside vendors or service providers to perform functions on our behalf (e.g., analyzing data, providing marketing assistance, providing customer service, etc.). We may also gather aggregated data about you and disclose such aggregated (but not personally identifiable) information to third parties for promotional or other purposes.

3. Security Procedures to Protect Information

3.1 Security Procedures

We monitor for and try to prevent security breaches.

We implement security safeguards designed to protect your data, such as HTTPS. We regularly monitor our systems for possible vulnerabilities and attacks. However, we cannot warrant the security of any information that you send us. There is no guarantee that data may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards.

We maintain numerous security standards and procedures to help prevent unauthorized access to confidential information about you. As long as the web browser you are using supports Secure Sockets Layer (SSL), your information will be submitted to us with a high level of security. We update and test our security technology on an ongoing basis. We have procedures limiting employee access to Personally Identifiable Information to those employees who have a business reason to know such information about you.

It is also important for you to help protect against unauthorized access by signing off of our Site each time you finish using the Site.

4. Inapplicability of Privacy Policies of Any Linked Sites or Other Parties

4.1 Linked Sites

Ripley's Site may contain links to other sites such as affiliates, subsidiaries or other third party distributors and sales representatives. This Privacy Policy only addresses Ripley's use and disclosure of your Personally Identifiable Information collected on this site. While we try to link only to sites that share our standards and respect for privacy, we are not responsible for the privacy practices of any third parties or the content of linked sites, and we encourage you to read the applicable privacy policies and terms and conditions of such parties or web sites.

5. Terms of Use, Notices and Changes to Our Privacy Policy

In the event of any conflict between the terms of this Privacy Policy and the Terms of Use, then the Terms of Use shall control.

5.1 Changes to Policies

As our business changes, this [Privacy Policy](#) and the [Terms of Use](#) are expected to change from time to time, and we reserve the right to change the Privacy Policy and Terms of Use at any time. The use of your information is subject to the Privacy Policy and Terms of Use in effect at the time of use. The provisions contained herein supersede all previous notices or statements regarding our privacy practices with respect to this Site. We may email periodic reminders of our notices and terms and conditions and post any changes to the Privacy Policy and the Terms of Use on our Site. We encourage you to check our Site frequently to see the current Privacy Policy and Terms of Use in effect and any changes that may have been made to them.

5.2 Legal Disclosures

We may need to share your data when we believe it's required by law or to help protect the rights and safety of you, us or others.

It is possible that we will need to disclose information about you when required by law, subpoena, or other legal process or if we have a good faith belief that disclosure is reasonably necessary to (1) investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies; (2) enforce our agreements with you, (3) investigate and defend ourselves against any third-party claims or allegations, (4) protect the security or integrity of our Service (such as by sharing with companies facing similar threats); or (5) exercise or protect the rights and safety of Ripley, our personnel, or others. We attempt to notify Members about legal demands for their personal data when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague or lack proper authority, but we do not promise to challenge every demand.

5.3 Change in Control or Sale

We may share your data when our business is sold to others, but it must continue to be used in accordance with this Privacy Policy.

We can also share your personal data as part of a sale, merger or change in control, or in preparation for any of these events. Any other entity which buys us or part of our business will have the right to continue to use your data, but only in the manner set out in this Privacy Policy unless you agree otherwise.

5.4 Rights to Access and Control Your Personal Data

You have the right to access or delete any personal data on file with Ripley.

We provide many choices about the collection, use and sharing of your data, from deleting or correcting data to advertising opt-outs.

For personal data that we have about you:

- **Delete Data:** You can ask us to erase or delete all or some of your personal data (e.g., if it is no longer necessary to provide Services to you).
- **Change or Correct Data:** You can edit some of your personal data. You can also ask us to change, update or fix your data in certain cases, particularly if it's inaccurate.
- **Object to, or Limit or Restrict, Use of Data:** You can ask us to stop using all or some of your personal data (e.g., if we have no legal right to keep using it) or to limit our use of it (e.g., if your personal data is inaccurate or unlawfully held).
- **Right to Access and/or Take Your Data:** You can email website@ripley-tools.com to request a copy of your personal data.

5.5 Account Closure (applies to customers who have ordered directly from Ripley): We keep some of your data even after you close your account.

If you choose to close your account with Ripley, we retain your personal data even after you have closed your account if reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse, enforce our User Agreement, or fulfill your request to “unsubscribe” from further messages from us. We will retain de-personalized information after your account has been closed.

6. Other Important Information

6.1 Lawful Bases for Processing

We have lawful bases to collect, use and share data about you. You have choices about our use of your data.

At any time, you can withdraw consent you have provided by emailing website@ripley-tools.com

We will only collect and process personal data about you where we have lawful bases. Lawful bases include *consent* Where we process data based on consent, we will ask for your explicit consent. You may withdraw your consent at any time, but that will not affect the lawfulness of the processing of your personal data prior to such withdrawal. Where we rely on contract, we will ask that you agree to the processing of personal data that is necessary for entering into or performance of your contract with us. We will rely on legitimate interests as a basis for data processing where the processing of your data is not overridden by your interests or fundamental rights and freedoms. (where you have given consent), contract (where processing is necessary for the performance of a contract with you) and “legitimate interests”.

Where we rely on your consent to process personal data, you have the right to withdraw or decline your consent at any time and where we rely on legitimate interests, you have the right to object. If you have any questions about the lawful bases upon which we collect and use your personal data, please contact our Data Protection Officer at DPO@ripley-tools.com

6.2 Direct Marketing and Do Not Track Signals

We currently do not share personal data with third parties for their direct marketing purposes without your permission.

6.3 Contact Information

You can contact us or use other options to resolve any complaints.

If you have questions or complaints regarding this Policy, please first website@ripley-tools.com. You can also reach us by physical mail at: Ripley Tools, Attn: Data Protection Officer, 46 Nooks Hill Road, Cromwell, CT 06416 USA . Residents in the *Designated Countries* We use the term “Designated Countries” to refer to countries in the European Union (EU), European Economic Area (EEA), and Switzerland have the right to contact our Data Protection Officer at: dpo@ripley-tools.com or 860-635-2200.