

# Website Privacy Policy

Last modified: August 2022

## **Introduction**

SCM Group North America, Inc. ("**Company**" or "**We**") respect your privacy and are committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide when you visit the website <https://shop.scmgroup.com/scmwood-na/us/en/> (our "**Website**") and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we collect:

- On this Website.
- In email, text, and other electronic messages between you and this Website.
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by Company or any third party (including our affiliates and subsidiaries); or
- Any third party, including through any application or content (including advertising) that may link to or be accessible from or through the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this privacy policy. This policy may change from time to time (see Changes to Our Privacy Policy). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

## **Children Under the Age of 16**

Given that our Website pertains to the purchase of specialized equipment, our Website is not intended for children under 16 years of age. No one under age 16 may provide any personal information to or on the Website. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on this Website or register on the Website, make any purchases through the Website, use any of the interactive or public comment features of this Website, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at [privacy@scmgroup.com](mailto:privacy@scmgroup.com)

California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information. Please see Your State Privacy Rights for more information.

### **Information We Collect About You and How We Collect It**

We collect several types of information from and about users of our Website, including information:

- By which you may be personally identified, such as name, postal address, email address, telephone number, or any other identifier by which you may be contacted online or offline]("**personal information**");
- That is about you but individually does not identify you; and/or
- About your internet connection, the equipment you use to access our Website, and usage details.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.
- From third parties, for example, our business partners.

### ***Information You Provide to Us***

The information we collect on or through our Website may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of registering to use our Website, posting material, or requesting further services. We may also ask you for information when you report a problem with our Website.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Details of transactions you carry out through our Website and of the fulfillment of your orders. You may be required to provide financial information before placing an order through our Website.

You also may provide information to be published or displayed (hereinafter, "**posted**") on public areas of the Website, or transmitted to other users of the Website or third parties, such as product reviews (collectively, "**User Contributions**"). Your User Contributions are posted on and transmitted to others at your own risk. Additionally, we cannot control the actions of other users of the Website with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

### ***Information We Collect Through Automatic Data Collection Technologies***

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

[We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). Click here [URL LINK TO DO NOT TRACK DISCLOSURES] for information on how you can opt out of behavioral tracking on this website and how we respond to web browser signals and other mechanisms that enable consumers to exercise choice about behavioral tracking.] The information we collect automatically is only statistical data and does not include personal information. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- **Web Beacons.** Pages of our Website and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

We do not collect personal information automatically, but we may tie this information to personal information about you that we collect from other sources or you provide to us.

### **Third-Party Use of Cookies and Other Tracking Technologies**

Some content or applications, including advertisements, on the Website are served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across

different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see Choices About How We Use and Disclose Your Information.

### **How We Use Your Information**

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your account.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or any products or services we offer or provide through it.
- To allow you to participate in interactive features on our Website.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may also use your information to contact you about our own and third-parties' goods and services that may be of interest to you. If you do not want us to use your information in this way, please check the relevant box located on the form on which we collect your data (the order form/registration form) or adjust your user preferences in your account profile. For more information, see Choices About How We Use and Disclose Your Information.

We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

### **Disclosure of Your Information**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.

- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our Website users is among the assets transferred.
- To fulfill the purpose for which you provide it. For example, if you give us an email address to use the "email a friend" feature of our Website, we will transmit the contents of that email and your email address to the recipients.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our terms and conditions <https://shop.scmgroup.com/scmwood-na/us/en/> and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of our company, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

### **Choices About How We Use and Disclose Your Information**

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** 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.
- **Disclosure of Your Information for Third-Party Advertising.** If you do not want us to share your personal information with unaffiliated or non-agent third parties for promotional purposes, you can opt-out by checking the relevant box located on the form on which we collect your data (the order form). You can also always opt-out by logging into the Website and adjusting your user preferences in your account profile, checking or unchecking the relevant boxes or by sending us an email with your request to [privacy@scmgroup.com](mailto:privacy@scmgroup.com)
- **Promotional Offers from the Company.** If you do not wish to have your email address/contact information used by the Company to promote our own or third parties' products or services, you can opt-out by checking the relevant box located on the form on which we collect your data (the order form) or at any other time by logging into the Website and adjusting your user preferences in your account profile by checking or

unchecking the relevant boxes or by sending us an email stating your request to [privacy@scmgroup.com](mailto:privacy@scmgroup.com). If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions. This opt out does not apply to information provided to the Company as a result of a product purchase, warranty registration, product service experience or other transactions.

- **Targeted Advertising.** If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target-audience preferences, you can opt-out. For this opt-out to function, you must have your browser set to accept all browser cookies.

We do not control third parties' collection or use of your information to serve interest-based advertising. However these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("**NAI**") on the NAI's website.

Residents of certain states, such as California, Nevada, Colorado, Connecticut, Virginia, and Utah may have additional personal information rights and choices. Please see Your State Privacy Rights for more information.

### **Accessing and Correcting Your Information**

You can review and change your personal information by logging into the Website and visiting your account profile page.

You may also send us an email at [privacy@scmgroup.com](mailto:privacy@scmgroup.com) to request access to, correct or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you delete your User Contributions from the Website, copies of your User Contributions may remain viewable in cached and archived pages, or might have been copied or stored by other Website users. Proper access and use of information provided on the Website, including User Contributions, is governed by our terms of use <https://shop.scmgroup.com/scmwood-na/us/en/>

Residents of certain states, such as California, Nevada, Colorado, Virginia, and Utah may have additional personal information rights and choices. Please see Your State Privacy Rights for more information.

### **Your State Privacy Rights**

State consumer privacy laws may provide their residents with additional rights regarding our use of their personal information. To learn more about California residents' privacy rights, visit <https://oag.ca.gov/privacy/ccpa> – SEE BELOW]. California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that 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 to [privacy@scmgroup.com](mailto:privacy@scmgroup.com) or write us at: SCM Group North America 2475 Satellite Blvd, Duluth, GA 30096, United States.

Colorado, Connecticut, Virginia, and Utah each provide their state residents with rights to:

- Confirm whether we process their personal information.
- Access and delete certain personal information.
- Data portability.
- Opt-out of personal data processing for targeted advertising and sales.

Colorado, Connecticut, and Virginia also provide their state residents with rights to:

- Correct inaccuracies in their personal information, taking into account the information's nature processing purpose.
- Opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects.

To exercise any of these rights please:

Nevada provides its residents with a limited right to opt-out of certain personal information sales. Residents who wish to exercise this sale opt-out rights may submit a request to this designated address: [privacy@scmgroup.com](mailto:privacy@scmgroup.com). However, please know we do not currently sell data triggering that statute's opt-out requirements.

### **Data Security**

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Any payment transactions will be encrypted.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

### **Changes to Our Privacy Policy**

It is our policy to post any changes we make to our privacy policy on this page with a notice that the privacy policy has been updated on the Website home page. If we make material changes to how we treat our users' personal information, we will notify you by email to the email address specified in your account and/or through a notice on the Website home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

### **Contact Information**

To ask questions or comment about this privacy policy and our privacy practices, contact us at: [privacy@scmgroup.com](mailto:privacy@scmgroup.com).

**Supplemental Privacy Notice for California Residents**

SCM Group North America, Inc. (“Company,” “we,” “our,” or “us”) provides this supplemental privacy notice (“CCPA Notice”) for consumers that reside in California (“you,” or “your”) as required under California privacy laws, including the California Consumer Privacy Act of 2018 (“CCPA”). This CCPA Notice applies to the Company and its affiliated operating companies (“Affiliates”).

We provide this CCPA Notice to inform you about how we collect, use or disclose your personal information. Under the CCPA, “personal information” is any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household. It does not include publicly available data as defined by the CCPA. This CCPA Notice supplements our Privacy Notice. In the event of a conflict between our Privacy Notice and this CCPA Notice, this CCPA Notice will prevail for California residents and their rights under California law.

**Categories of Personal Information that We Collect, Use, and Disclose**  
 The type of personal information we collect, use, and disclose will depend on your interaction or relationship with us. The chart below generally identifies the personal information we collect based on the categories of personal information set forth in the CCPA.

<b>Categories of personal information as set forth in the CCPA</b>	<b>Personal information we collect</b>
<p><b>Name, Contact Information and other Identifiers:</b>                      Identifiers such as a real name, alias, address, unique personal identifier, online identifier, Internet Protocol (IP) address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.</p>	<p>We may collect information such as your name, address, email address, telephone numbers, and IP address.</p>
<p><b>Customer Records:</b> Paper and electronic customer records containing personal information, such as name, signature, physical characteristics or description, address, telephone number, education, current employment, employment history, social security number, passport number, driver's license or state identification card number, insurance policy number, bank account number, credit card number, debit card number, or any other financial or payment information, medical information, or health insurance information.</p>	<p>We may collect information such as your name, address, email address, telephone numbers, employment, credit card number, debit card number, or any other financial or payment information.</p>



<p><b>Protected Classifications:</b> Characteristics of protected classifications under California or federal law such as race, color, sex, age, religion, national origin, disability, citizenship status, and genetic information.</p>	<p>We do not collect this information.</p>
<p><b>Purchase History and Tendencies:</b> Commercial information including records of personal property, products or services purchased, obtained, or considered, or other purchasing or use histories or tendencies.</p>	<p>We may collect information such as the products or services you purchased or utilized.</p>
<p><b>Biometric Information:</b> Physiological, biological or behavioral characteristics that can be used alone or in combination with each other to establish individual identity, including DNA, imagery of the iris, retina, fingerprint, faceprint, hand, palm, vein patterns, and voice recordings, keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.</p>	<p>We may collect voice recordings when we monitor and record telephone calls.</p>
<p><b>Usage Data:</b> Internet or other electronic network activity information, including, but not limited to, browsing history, clickstream data, search history, and information regarding a resident's interaction with an internet website, application, or advertisement.</p>	<p>We may collect this information as part of your interaction with our Website (as defined in our Privacy Notice) and through advertisements.</p>
<p><b>Geolocation Data:</b> Precise geographic location information about a particular individual or device.</p>	<p>We may collect information such as your postal address, zip code, or the location associated with an IP address or particular device.</p>
<p><b>Audio, Video and other Electronic Data:</b> Audio, electronic, visual, thermal, olfactory, or similar information, such as, CCTV footage, photographs, and call recordings and other audio recording (e.g., recorded meetings and webinars).</p>	<p>We may collect voice recordings when we monitor and record telephone calls, photos or videos that are tagged or shared with us through social media posts, or audio, video, or images captured in security footage of our business locations.</p>
<p><b>Professional or employment-related information:</b> Employment history, qualifications, licensing, disciplinary record.</p>	<p>We may collect your current employer and title.</p>
<p><b>Education Information:</b> Information about</p>	<p>We do not collect this information.</p>

<p>education history or background that is not publicly available personally identifiable information as defined in the federal Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).</p>	
<p><b>Profiles and Inferences:</b> Inferences drawn from any of the information identified above to create a profile reflecting a resident's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.</p>	<p>We may collect or derive information such as your preferences, characteristics, predispositions, and behavior based on other information we have about you. For example, if you declare you are on our site and declare yourself as a private citizen (instead of B2B), we might assume that you have a preference for woodworking.</p>

We collect these categories of personal information from the sources described in our Privacy Notice and for the purposes described in the “Information We Collect and Its Uses” section of our Privacy Notice. We disclose your personal information to third parties, such as our service providers, as described in the “Disclosure of Information” section of our Privacy Notice. We do not collect personal information directly from children under the age of eighteen (18).

**Third-Party Cookies & Similar Technologies**

We may also use standard internet technology, such as cookies, web beacons, pixels, and other similar technologies (collectively “cookies”) to track your use of our Website as defined in our Privacy Notice. We may include web beacons in promotional email messages or newsletters to determine whether messages have been opened and acted upon. The information we obtain in this manner enables us to customize the services we offer to deliver targeted advertisements and to measure the overall effectiveness of our online advertising, content, programming or other activities. See the “Cookies & Related Technologies” section of our Privacy Notice for more information. Data that is collected through network advertising or social media cookies may be disclosed by such network advertisers or social media to other network advertisers that allows those advertisers to also display ads to you. While there is currently no industry consensus, we do not consider these additional disclosures to be our sale of personal information under the CCPA. If you do not want information collected by cookies, however, please visit [www.aboutads.info](http://www.aboutads.info) and [www.networkadvertising.org](http://www.networkadvertising.org) to opt-out.

**California Resident Rights**

If you are a California resident, you have certain rights with respect to your personal information as set forth below.

Request to Delete: You may request that we delete personal information we have collected about you, subject to certain exemptions provided by law.

Request to Know: You may request, subject to certain exemptions, that we disclose to you the categories of personal information collected; the categories of sources of personal information; the business or commercial purposes for collecting and selling your personal information; the categories of third parties with whom we have shared your personal information; the categories of personal information that we have disclosed or shared with a third party for a business purpose; the categories of third parties to whom your personal information has been sold and the

specific categories of personal information sold to each category of third party; and the specific pieces of personal information that we have collected about you in the prior 12 months.

Request to Opt-out of Our Sale of Your Personal Information: We do not sell your personal information.

Submitting Requests: To make a Request to Delete or a Request to Know, please contact us at [privacy@scmgroup.com](mailto:privacy@scmgroup.com). Please include your full name, postal address, and email address. If you designate an authorized agent to make a request on your behalf, we require you to provide a written and signed authorization of your agent's permission to exercise your rights on your behalf as provided for in this section. Please include your full name, postal address, and email address along with your agent's full name, postal address, email address, and relationship to you.

If we are unable to verify your identity based on this information, we will take additional steps to verify your identity before responding to your request. We will respond to verifiable requests received from California residents or their authorized agents in accordance with the law, which provides certain exemptions for disclosure or deletion.

These rights do not apply to personal information we collect about job applicants, independent contractors, or our current or former full-time, part-time and temporary employees and other staff, or information we collect when we act as a service provider.

Non-Discrimination: We are not permitted to nor do we discriminate against California residents who exercise their rights under the law.

### **Other California Privacy Rights**

If you are a customer who resides in the State of California, you have the right to request from us a list of third parties with whom we shared personal information about you for their own direct marketing purposes during the previous calendar year by contacting us at [privacy@scmgroup.com](mailto:privacy@scmgroup.com) by sending a letter to us at SCM Group North America 2475 Satellite Blvd, Duluth, GA 30096, United States. Privacy rights under Shine the Light and the CCPA are provided under different legal rules and must be exercised separately.

Third parties, including our service providers, may collect information about your online activities over time and across different websites, including when you visit our Website.

### **Last Update**

This CCPA Notice was last updated August 2022.