

# ASSEMBLED PRODUCTS CORPORATION PRIVACY STATEMENT

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## INTRODUCTION

Assembled Products is committed to helping communities thrive by bringing innovative solutions through products that make life better. We're passionate about quality and delivering service to our customers with integrity.

We pledge to deliver the highest level of customer service, which includes respecting your privacy and protecting your personal information. In this privacy statement ("Statement"), we provide you with details about how we collect, use, and disclose your personal information.

This Statement applies to Assembled Products Corporation, and all of its brands d.b.a. Jotto Desk, Mart Cart, and Spray Master Technologies (collectively, "APC," "we," or "us").

By using any of our products or services and/or by agreeing to this Statement, e.g. in the context of researching, inquiring, conversing, negotiating, or engaging our staff to place an order for any of our products or services, you understand and acknowledge that we will collect and use personal information as described in this Statement.

Please note that this Statement does not apply to our processing of personal information on behalf of and subject to the instructions of third parties such as credit card processors and financial institutions.

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## **COLLECTION OF PERSONAL INFORMATION - GENERALLY**

The chart below summarizes the categories of personal information we have collected/may collect, the sources for those categories of personal information, the business or commercial purposes for which the information was/may be collected, and the categories of third parties with whom the information may have been/may be shared, as permitted by law. APC does NOT sell your personal information.

<b>Categories of Information</b>	<b>Source(s) Obtained from</b>	<b>Business or Commercial Purpose for the Information</b>	<b>With whom the information has been/may be shared with</b>
Name	<ul style="list-style-type: none"> <li>• Directly from you</li> <li>• From third party partners such as sales representatives, distributors, and trade show organizers</li> <li>• From demographic companies</li> </ul>	<ul style="list-style-type: none"> <li>• Provide customer service and support</li> <li>• Send communication regarding your goods/services order with us</li> <li>• Ship your order and/or provide service at your location.</li> <li>• Verify identity</li> <li>• Verify credit for establishing/maintaining account terms</li> <li>• Send marketing communications via email, direct mail, social media, and other electronic forms</li> <li>• Perform aggregated analytics to improve business operations</li> <li>• Process payments</li> <li>• Process transactions with partners</li> <li>• Administer contests and sweepstakes (if any)</li> <li>• Detect and prevent fraud</li> <li>• Engage in sales and service activity for goods and services</li> </ul>	<ul style="list-style-type: none"> <li>• Service Provider partners performing the services at your location</li> <li>• Payment card providers</li> <li>• Credit information partners</li> <li>• Entities that have entered into an agreement with APC instrumental to provide the good or service</li> <li>• Government agencies pursuant to legal requirements in some countries</li> <li>• Freight and parcel carriers delivering the goods.</li> </ul>

<p>Contact information (mailing address, shipping address, billing address, email address, phone number)</p>	<ul style="list-style-type: none"> <li>• Directly from you</li> <li>• From third party partners such as sales representatives, distributors and trade show organizers</li> <li>• From demographics companies</li> </ul>	<ul style="list-style-type: none"> <li>• Provide customer service and support</li> <li>• Send communications regarding your goods/services order with us</li> <li>• Verify identity</li> <li>• Verify credit for establishing/maintaining account terms</li> <li>• Send marketing communications via email, direct mail, social media, and other electronic forms</li> <li>• Ship your order and/or provide service at your location.</li> <li>• Perform aggregated analytics to improve business operations</li> <li>• Process payments</li> <li>• Process transactions with partners</li> <li>• Administer contests and sweepstakes (if any)</li> <li>• Detect and prevent fraud</li> <li>• Engage in sales and service activity for goods and services</li> </ul>	<ul style="list-style-type: none"> <li>• Service Provider partners performing the services at your location</li> <li>• Payment card providers</li> <li>• Credit information partners</li> <li>• Entities that have entered into an agreement with APC instrumental to provide the good or service</li> <li>• Government agencies pursuant to legal requirements in some countries</li> <li>• Freight and parcel carriers delivering the goods.</li> </ul>
<p>Telephone</p>	<ul style="list-style-type: none"> <li>• Directly from you</li> <li>• From third parties such as sales</li> </ul>	<ul style="list-style-type: none"> <li>• Provide customer service and support</li> <li>• Send SMS and/ or other communications regarding your</li> </ul>	<ul style="list-style-type: none"> <li>• Service Provider partners performing the services at your location</li> </ul>

	<p>representative, distributors, and trade show organizers</p> <ul style="list-style-type: none"> <li>• From demographics companies</li> </ul>	<p>goods/services order with us</p> <ul style="list-style-type: none"> <li>• Verify identity</li> <li>• Verify credit for establishing/maintaining account terms</li> <li>• Send marketing communications via SMS, email, direct mail, and social media</li> <li>• Ship your order and/or provide service at your location.</li> <li>• Perform aggregated analytics to improve business operations</li> <li>• Process payments</li> <li>• Process transactions with partners</li> <li>• Administer contests and sweepstakes (if any)</li> <li>• Detect and prevent fraud</li> <li>• Engage in sales and service activity for goods and services</li> </ul>	<ul style="list-style-type: none"> <li>• Payment card providers</li> <li>• Credit information partners</li> <li>• Entities that have entered into an agreement with APC instrumental to provide the good or service</li> <li>• Government agencies pursuant to legal requirements in some countries</li> <li>• Freight and parcel carriers delivering the goods.</li> </ul>
Email Address	<ul style="list-style-type: none"> <li>• Directly from you</li> <li>• From third parties such as sales representative, distributors, and trade show organizers</li> </ul>	<ul style="list-style-type: none"> <li>• Provide customer service and support</li> <li>• Send other communications regarding your goods/services order with us</li> <li>• Verify identity</li> <li>• Send marketing communications via email and social media</li> </ul>	<ul style="list-style-type: none"> <li>• Service Provider partners performing the services at your location</li> <li>• Payment card providers</li> <li>• Entities that have entered into an agreement with APC instrumental to</li> </ul>

	<ul style="list-style-type: none"> <li>• From demographic companies</li> </ul>	<ul style="list-style-type: none"> <li>• Ship your order and/or provide service at your location.</li> <li>• Perform aggregated analytics to improve business operations</li> <li>• Process payments</li> <li>• Process transactions with partners</li> <li>• Administer contests and sweepstakes (if any)</li> <li>• Detect and prevent fraud</li> <li>• Engage in sales and service activity for goods and services</li> </ul>	<p>provide the good or service</p> <ul style="list-style-type: none"> <li>• Government agencies pursuant to legal requirements in some countries</li> <li>• Freight and parcel carriers delivering the goods.</li> </ul>
Payment Card Information	<ul style="list-style-type: none"> <li>• Directly from you</li> </ul>	<ul style="list-style-type: none"> <li>• Process payments</li> <li>• Detect and prevent fraud</li> </ul>	<ul style="list-style-type: none"> <li>• Payment processors</li> </ul>
Business Entity Name	<ul style="list-style-type: none"> <li>• Directly from you</li> </ul>	<ul style="list-style-type: none"> <li>• Verify credit for establishing/maintaining account terms</li> <li>• Provide customer service and support</li> <li>• Process payments</li> <li>• Process transactions with partners</li> </ul>	<ul style="list-style-type: none"> <li>• Entities partnered with APC instrumental in providing the good or service</li> <li>• Credit information partners</li> </ul>
Additional name(s) associated with your account	<ul style="list-style-type: none"> <li>• Directly from you</li> </ul>	<ul style="list-style-type: none"> <li>• Provide customer service and support</li> <li>• Verify identity</li> <li>• Detect and prevent fraud</li> </ul>	<ul style="list-style-type: none"> <li>• Entities partnered with APC instrumental in providing the good or service</li> </ul>
Geolocation information	<ul style="list-style-type: none"> <li>• Directly from you by request</li> </ul>	<ul style="list-style-type: none"> <li>• Provide product to specification for our geolocation-enabled technology offerings on</li> </ul>	<ul style="list-style-type: none"> <li>• Third-party geolocation service providers for performance of the</li> </ul>

		<p>select products and services</p> <ul style="list-style-type: none"> <li>• Provide customer service and support</li> </ul>	<p>product to specification.</p>
Social Media Information	<ul style="list-style-type: none"> <li>• Directly from you</li> </ul>	<ul style="list-style-type: none"> <li>• Perform analytics to provide personalized offers and content</li> <li>• Link with information APC already has on file</li> </ul>	<ul style="list-style-type: none"> <li>• This data is not shared with third parties.</li> </ul>
Demographics data	<ul style="list-style-type: none"> <li>• Directly from you</li> <li>• From third-party companies that provide demographics data</li> </ul>	<ul style="list-style-type: none"> <li>• Perform analytics to provide personalized offers and content</li> <li>• Link with information APC already has on file</li> </ul>	<ul style="list-style-type: none"> <li>• Third-party sales representatives and distributors of APC products.</li> </ul>
Your communication preferences, such as opt out of emails	<ul style="list-style-type: none"> <li>• Directly from you</li> </ul>	<ul style="list-style-type: none"> <li>• To better serve you</li> </ul>	<ul style="list-style-type: none"> <li>• This data is not shared with third parties.</li> </ul>
Ratings and survey responses	<ul style="list-style-type: none"> <li>• Directly from you</li> </ul>	<ul style="list-style-type: none"> <li>• Troubleshoot and resolve issues</li> <li>• Improve customer experience</li> <li>• Improve business processes</li> </ul>	<ul style="list-style-type: none"> <li>• This data is not shared with third parties.</li> </ul>
Free-form feedback	<ul style="list-style-type: none"> <li>• Directly from you</li> </ul>	<ul style="list-style-type: none"> <li>• Troubleshoot and resolve issues</li> <li>• Provide customer service and support</li> <li>• Improve customer experience</li> </ul>	<ul style="list-style-type: none"> <li>• This data is not shared with third parties.</li> </ul>

APC does not knowingly collect, disclose, or sell personal information of minors under the age of 18 without permission from a minor's parent or guardian. When engaging with APC for goods or services, you may be asked to provide your age if we have reason to believe you are a minor under the age of 18. APC collects this information for the purpose of maintaining lawful business practices.

French residents: as disclosed in this Statement, we may collect your phone number to fulfill the terms of your order or service, send you communications relating to our transactions, provide customer service and support, verify identity, send marketing communications via SMS, process transactions with partners, share data with third parties necessary to complete the transaction or provide the good or service, authenticate mobile accounts, send service-related SMS communications, detect and prevent fraud, and engage in sales activities. We will not use your phone number for telemarketing. Nonetheless, if you would like to register on the list of opposition to telephone canvassing, you may do so at [www.bloctel.gouv.fr](http://www.bloctel.gouv.fr).

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## **COLLECTION OF PERSONAL INFORMATION – NOTICE AT POINT OF COLLECTION**

- **Browsing APC Websites**

When you browse an Assembled Products Corporation website, we collect the following categories of personal information about you, which are used for the following purposes:



<b>We collect the following categories of personal information:</b>	<b>We collect this information in order to:</b>
<ul style="list-style-type: none"> <li>• APC does not collect information generated by browsing activity (defined as clicks, page views, or cursor movement)</li> </ul>	<ul style="list-style-type: none"> <li>• N/A</li> </ul>
<ul style="list-style-type: none"> <li>• Free form textual feedback (when engaging with a LiveHelpNow agent via chat)</li> </ul>	<ul style="list-style-type: none"> <li>• Provide assistance and information</li> <li>• Troubleshoot and resolve website issues</li> <li>• Improve customer experience</li> </ul>

If you have an account log in for one of our sites or mobile application, and you log into the site or mobile application, then we collect the following information about you, which are used for the following purposes:

<b>We collect the following categories of information:</b>	<b>We collect this information in order to:</b>
<ul style="list-style-type: none"> <li>• APC does not collect information associated with logging into the website(s)</li> </ul>	<ul style="list-style-type: none"> <li>• N/A</li> </ul>
<ul style="list-style-type: none"> <li>• Geo-location (mobile application)</li> </ul>	<ul style="list-style-type: none"> <li>• To provide location-specific features within the application</li> </ul>
<ul style="list-style-type: none"> <li>• Phone number (mobile application)</li> </ul>	<ul style="list-style-type: none"> <li>• To verify registration for access to app features</li> </ul>

Placing an Order for Goods or Services

When you place an order for goods or services, we may collect and/or confirm the following categories of personal information about you, which are used for the following purposes:

<b>We collect the following categories of personal information:</b>	<b>We collect this information in order to:</b>
<ul style="list-style-type: none"> <li>• Name</li> </ul>	<ul style="list-style-type: none"> <li>• Look up and verify your account</li> <li>• Fulfill your order</li> <li>• Send you communications relating to your order</li> <li>• Send you marketing communications via email and direct mail</li> <li>• Perform analytics to provide you with personalized offers and content</li> <li>• Perform analytics to improve business operations</li> <li>• Determine your eligibility for special or promotional offers</li> <li>• Process payments</li> <li>• Process transactions with partners</li> <li>• Share this information with third party partners in providing the good or service</li> <li>• Optimize our web sites and mobile apps</li> <li>• Detect and prevent fraud</li> </ul>
<ul style="list-style-type: none"> <li>• Additional name(s) associated with your account</li> </ul>	<ul style="list-style-type: none"> <li>• Provide customer service and support</li> <li>• Detect and prevent fraud</li> </ul>
<ul style="list-style-type: none"> <li>• Customer/Vendor Number</li> </ul>	<ul style="list-style-type: none"> <li>• Look up and verify your account with APC</li> </ul>

	<ul style="list-style-type: none"> <li>• Administer support conducive to excellent customer service and pursuant to agreements</li> </ul>
<ul style="list-style-type: none"> <li>• Phone number</li> </ul>	<ul style="list-style-type: none"> <li>• Send you text messages regarding your order</li> <li>• Perform analytics in order to provide you with personalized offers and content</li> <li>• Perform analytics to improve business operations</li> <li>• Process transactions with partners</li> <li>• Provide customer service and support</li> <li>• Share with freight and parcel carriers for delivery of goods</li> <li>• Share with third party partners in providing goods and services</li> <li>• Detect and prevent fraud</li> </ul>
<ul style="list-style-type: none"> <li>• Address</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfill your order for goods and/or services</li> <li>• Send you communication relating to your order</li> <li>• Send you marketing communications</li> <li>• Perform analytics to provide you with personalized offers and content</li> <li>• Perform analytics to improve business operations</li> <li>• Send invoices, statements, and to process payments</li> <li>• Process transactions with partners</li> </ul>

	<ul style="list-style-type: none"> <li>• Share with freight and parcel carriers for delivery of goods</li> <li>• Share with third party partners in providing the goods and services</li> <li>• Detect and prevent fraud</li> </ul>
<ul style="list-style-type: none"> <li>• Address type (whether the address is residential or not)</li> </ul>	<ul style="list-style-type: none"> <li>• Share with freight and parcel companies for delivery of goods</li> <li>• Perform analytics to improve business practices</li> </ul>
<ul style="list-style-type: none"> <li>• Email address</li> </ul>	<ul style="list-style-type: none"> <li>• Send you communications relating to your order</li> <li>• Send you marketing communications</li> <li>• Perform analytics to provide you with personalized offers and content</li> <li>• Perform analytics to improve business operations</li> <li>• Process transactions with partners</li> <li>• Share with freight and parcel companies for communication regarding delivery of goods</li> <li>• Detect and prevent fraud</li> <li>• Share with third party partners in providing the goods and services</li> </ul>
<ul style="list-style-type: none"> <li>• Payment Card Information</li> </ul>	<ul style="list-style-type: none"> <li>• Process payments</li> <li>• Detect and prevent fraud</li> </ul>
<ul style="list-style-type: none"> <li>• Business Entity Name and Number</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfill your order for goods and/or services</li> <li>• Administer support conducive to excellent customer service and pursuant to agreements</li> </ul>

	<ul style="list-style-type: none"> <li>• Determine your eligibility for special or promotional offers</li> <li>• Perform analytics to improve business practices</li> </ul>
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▪ Creating an Online Account

When you create an online account on any of APC's websites, we collect the following categories of personal information about you, which are used for the following purposes:

<b>We collect the following categories of personal information:</b>	<b>We collect this information in order to:</b>
<ul style="list-style-type: none"> <li>• Name</li> </ul>	<ul style="list-style-type: none"> <li>• Detect and prevent fraud</li> <li>• Provide customer service</li> </ul>
<ul style="list-style-type: none"> <li>• Address</li> </ul>	<ul style="list-style-type: none"> <li>• Send you marketing communications</li> <li>• Perform analytics to improve business operations</li> <li>• Process transactions with partners</li> <li>• Share with freight and parcel companies for communication regarding delivery of goods</li> <li>• Detect and prevent fraud</li> <li>• Share with third party partners in providing the goods and services</li> </ul>
<ul style="list-style-type: none"> <li>• Phone</li> </ul>	<ul style="list-style-type: none"> <li>• Send you communications relating to your order</li> </ul>

	<ul style="list-style-type: none"> <li>• Send you marketing communications</li> <li>• Perform analytics to provide you with personalized offers and content</li> <li>• Perform analytics to improve business operations</li> <li>• Process transactions with partners</li> <li>• Share with freight and parcel companies for communication regarding delivery of goods</li> <li>• Detect and prevent fraud</li> <li>• Share with third party partners in providing the goods and services</li> </ul>
<ul style="list-style-type: none"> <li>• Email</li> </ul>	<ul style="list-style-type: none"> <li>• Send you communications relating to your order</li> <li>• Send you marketing communications</li> <li>• Perform analytics to provide you with personalized offers and content</li> <li>• Perform analytics to improve business operations</li> <li>• Process transactions with partners</li> <li>• Share with freight and parcel companies for communication regarding delivery of goods</li> </ul>

	<ul style="list-style-type: none"> <li>• Detect and prevent fraud</li> <li>• Share with third party partners in providing the goods and services</li> </ul>
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Registering for Access to a Mobile App.

When you register for access to one of APC’s mobile application(s), we collect the following categories of personal information about you, which are used for the following purposes:

<b>We collect the following categories of personal information:</b>	<b>We collect this information in order to:</b>
<ul style="list-style-type: none"> <li>• Name</li> </ul>	<ul style="list-style-type: none"> <li>• Verify identity</li> <li>• Perform analytics to improve business operations</li> <li>• Detect and prevent fraud</li> <li>• Link to data providing/restricting access to features within the app</li> </ul>
<ul style="list-style-type: none"> <li>• Mobile Phone Number</li> </ul>	<ul style="list-style-type: none"> <li>• Administer your app access</li> <li>• Send you text or SMS messages relating to your account with APC</li> <li>• Detect and prevent fraud</li> <li>• Link to data providing/restricting access to features within the app</li> </ul>
<ul style="list-style-type: none"> <li>• Customer Number</li> </ul>	<ul style="list-style-type: none"> <li>• Verify identity</li> </ul>

	<ul style="list-style-type: none"> <li>• Link to data providing/restricting access to features within the app</li> </ul>
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Establishing an Account or Applying for Terms of Credit.

When a Customer, Vendor, or Third-Party Partner establishes an account or applies for terms of credit on their account with APC, we may collect the following additional categories of personal information about you, which are used for the following purposes:

<b>We may collect the following categories of personal information:</b>	<b>We collect this information in order to:</b>
Tax ID (SSN/FEIN)	<ul style="list-style-type: none"> <li>• Comply with governmental reporting requirements in certain locations</li> <li>• Verify credit for establishing/maintaining account terms</li> </ul>
Tax Exempt Information	<ul style="list-style-type: none"> <li>• Comply with tax laws and regulations</li> </ul>
Business Entity Classifications	<ul style="list-style-type: none"> <li>• Comply with governmental reporting requirements in certain locations</li> <li>• Comply with tax laws and regulations</li> </ul>
Years at current address	<ul style="list-style-type: none"> <li>• Verify credit for establishing/maintaining account terms</li> </ul>



Associate References	<ul style="list-style-type: none"> <li>• Verify credit for establishing/maintaining account terms</li> </ul>
Dun & Bradstreet Number	<ul style="list-style-type: none"> <li>• Verify credit for establishing/maintaining account terms</li> </ul>
Payment Preferences	<ul style="list-style-type: none"> <li>• Provide customer service</li> <li>• Detect and prevent fraud</li> </ul>
Minority Certification information (Vendors only)	<ul style="list-style-type: none"> <li>• Comply with applicable laws that require us to collect this information</li> <li>• Perform aggregate analytics to ensure non-discriminatory business practices</li> </ul>
Financial Institution and Account Information	<ul style="list-style-type: none"> <li>• Process payments</li> <li>• Detect and prevent fraud</li> </ul>

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## **ANALYTICS AND INTEREST-BASED ADVERTISEMENTS**

We may partner with certain third-party service providers to collect information to engage in analytics, auditing, research, and reporting. These third parties may use server logs, web beacons, tags, pixels, and similar technologies, and they may set and access cookies on your computer or other device.

In particular, we may use analytics to help us understand how our customers use our websites. This information helps us identify and address technical issues and understand usage of our Services, which we use to improve the Services for you.

We also partner with LiveHelpNow which supports our chat platform. LiveHelpNow uses tags on websites to determine and enable predictive chat and allow the chat agent to understand what page the guest is on so the live agent can provide assistance. For LiveHelpNow's privacy information, go to [livehelpnow.net/privacy-policy/](http://livehelpnow.net/privacy-policy/)

We may also partner with third parties to provide advertising services that are targeted based on your online activities across websites, mobile apps, and devices over time (commonly referred to as "interest-based advertising"). Our advertising partners may collect information about your activities on our Services on your current device and combine it with information about your activities on other websites, mobile apps, and devices. They may collect such information using server logs, cookies, web beacons, tags, pixels, mobile advertising IDs (such as Facebook cookies or Google's Advertising ID), cross-device linking, and similar technologies. For example, our advertising partners may use the fact that you visited our website to target advertising to you on other websites and mobile apps on your current device or on other devices you use. They may match your browsers or devices if you log into the same online service on multiple devices or if your devices share similar attributes that support an inference that they are used by the same person or household. This means that information about your activity on websites or apps on your current browser or device may be combined and used with information collected from your other browsers or devices. You can opt out of interest-based advertising in web browsers and mobile apps on your current browser or device by following the instructions below.

For more information about interest-based advertising and cross-device linking, please visit the [Network Advertising Initiative \("NAI"\) website](#) and the [Digital Advertising Alliance \("DAA"\) website](#). We adhere to the DAA's interest-based advertising principles by providing you enhanced notice, transparency, and control of our digital marketing practices as stated at <http://www.aboutads.info/principles/>. You may opt out of interest-based advertising and cross-device linking in web browsers and mobile apps on your current browser or device by following the instructions below.

- **Web Browser Opt-Out.** To opt out in web browsers, please visit <http://optout.aboutads.info/> and <http://optout.networkadvertising.org>. To help preserve the choices that you make in the DAA's WebChoices page, you can install the DAA's "Protect My Choices" extension that is available at <http://www.aboutads.info/PMC>.
- **Mobile Application Opt-Out.** To opt out in mobile apps, you can adjust the advertising preferences on your mobile device. You can also opt out for companies that participate in the Digital Advertising Alliance's AppChoices tool by [downloading the app](#) and following the instructions. For more information about opting out on mobile devices, please see [here](#). Please note the Mart Cart App by APC is not used for advertising purposes by APC and therefore does not have an opt out selection.

Please note that the opt-outs described above will apply only to the specific browser or device from which you opt out, and therefore you will need to opt out separately on all of your browsers and devices. If you delete or reset your cookies or mobile advertising identifiers, change browsers (including upgrading certain browsers), or use a different device, any opt-out cookie or tool may no longer work, and you will need to opt out again. We do not respond to Do Not Track signals at this time.

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## **CHANGING AND ACCESSING YOUR PERSONAL INFORMATION**

If you have an online account, you may review and update the information you provided to us at the time of enrollment at any time by signing into your online account.

To the extent required by applicable law, you may be able to request that we inform you about the personal information we maintain about you and, where appropriate, withdraw your consent for certain data processing activity and/or request that we update, correct, delete, and/or stop processing your personal information. We will make all required updates and changes within the time specified by applicable law and as required by law. When permitted by law, we may charge an appropriate fee to cover the costs of responding to the request. Such requests may be submitted by calling our toll-free number (800) 548-3373, or in writing to Assembled Products Corporation, Attention: Privacy Rights, 115 East Linden Street, Rogers, AR 72756, USA.

In addition, in some circumstances based on applicable law, you may request that we cease sharing personal information about you with our business partners or that APC cease using personal information about you by contacting us using the email or mailing address above. We will honor those requests as required by applicable law.

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## CALIFORNIA CONSUMERS' RIGHTS

- **The Right to Know, The Right to Delete, and the Right to Opt-Out of the Sale of Personal Information**

The California Consumer Privacy Act ("CCPA") and the California Privacy Rights Act ("CPRA") afford California residents (1) the right to know what personal information we collect, use, disclose, and/or sell; (2) the right to request that we delete their personal information; and (3) the right to request that we no longer sell their personal information.

If you would like information about the personal information that we collect, disclose, and/or sell about you, or if you would like to make a request for us to delete or to stop selling your personal information, please send your request

in writing to info@assembledproducts.com, or by mail to Assembled Products Corporation, Attention: Privacy Rights, 115 East Linden Street, Rogers, AR 72756 USA.

You also may call our toll-free telephone number: (800) 548-3373 and ask for Customer Service.

When APC receives your request, APC will first verify your identity by asking you to provide your name, account number, and the email address and phone number associated with your account.

If you would like, you may designate an authorized agent to make a request on your behalf. In order to designate an authorized agent, please submit an order issued by a court, a document submitted by a barred attorney, or a formal certified document issued by an official governmental agency.

APC does not currently sell any personal information. If and when APC does sell information, information for opt-out preferences will be added here.

#### **Sensitive Personal Information**

We limit the use of your personal information to that use which is pursuant to performing reasonably expected goods or services or as required by law.

#### **▪ Direct Marketing Disclosure**

California consumers also may request information about our disclosures of certain categories of personal information to third parties for their direct marketing purposes. APC does not knowingly disclose or sell personal information for a third party's direct marketing purposes. In the event APC does enter into such an agreement, information for submitting requests will be posted here.

### **The Right to Non-Discrimination**

The CCPA/CPRA prohibit a business from treating a consumer differently because the consumer exercised a right conferred on him/her by the CCPA/CPRA. We welcome you to exercise your rights under the CCPA/CPRA, and we will not discriminate against you for doing so.

### **▪ Financial Incentive Notice**

APC does not offer a financial incentive for the collection, sale, or deletion of personal information. As detailed in this Statement, APC primarily collects personal data from you in order to promote and fulfill orders for goods and services provided by APC and from account holders in order to operate programs under agreements with you. APC also collects personal data for marketing and other purposes as permitted by applicable law.

The ability for an account holder to access promotions and offerings is not directly related to the value provided to the business of your data.

### **▪ Removal of Content**

If you are a California resident under the age of 18, and a registered user of any site where this policy is posted, California Business and Professions Code Section 22581 permits you to request and obtain removal of content or information you have publicly posted. To make such a request, please send an email with a detailed description of the specific content or information to [info@assembledproducts.com](mailto:info@assembledproducts.com) with the subject line "CA Privacy", or by mail to Assembled Products Corporation, Attn: Privacy Rights, 115 East Linden Street, Rogers, AR 72756. Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have

posted and that there may be circumstances in which the law does not require or allow removal even if requested.

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## NEVADA CONSUMERS' RIGHTS

- **The Right to Opt-Out of the Sale of Personal Information**

If you are a Nevada resident, you may request that we stop selling certain categories of personal information that we collect. APC does not currently sell any personal information. In the event that APC does enter an agreement to do so, information regarding opting out will be posted here.

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## HOW WE PROTECT PERSONAL INFORMATION

We take reasonable measures to: (i) protect personal information from unauthorized access, disclosure, alteration, or destruction, and (ii) keep personal information accurate and up-to-date as appropriate.

APC employs a team of dedicated information technology professionals who are responsible for managing APC's data security program. This team is responsible for, among many other things, monitoring our systems for protection against potential intrusions, responding to potential incidents, supporting information security, regularly reviewing and updating the security controls APC uses to protect data, and providing training on APC's information security program.

APC maintains a payment card industry (“PCI”) compliance program.

We require third parties with whom we share personal information to exercise reasonable efforts to maintain the confidentiality of personal information.

We will never ask you to send us confidential personal information or payment card information via email or text message.

In the event of a security incident, APC will notify regulators and/or consumers as required by applicable laws and regulations.

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## **DISCLOSURE PURSUANT TO LEGAL OBLIGATIONS OR TO PROTECT THE SAFETY AND SECURITY OF PEOPLE AND PROPERTY**

APC will disclose personal information as required by law. Examples of such disclosures include when a law enforcement agency serves a valid subpoena on APC, and when a civil litigant serves a lawful discovery request on APC. APC may elect to share personal information with law enforcement or others as necessary to protect the safety and security of people and property, to pursue available remedies or limit the damages that we may sustain, and to respond to an emergency.

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## **MARKETING COMMUNICATIONS CHOICES**



We want to make you aware of the fantastic products we offer! To do so, we may send you communications via email, text message, push notifications, in-app alerts, direct mail, and social media.

You may change the communications you receive from us by writing to us (and including your name and email address) at [info@assembledproducts.com](mailto:info@assembledproducts.com) or by mail at Assembled Products Corporation, Attn: Privacy Rights, 115 East Linden Street, Rogers, AR 72756, USA.

If you prefer not to receive email marketing materials from us, you may opt-out at any time by using the unsubscribe or opt out function in any email you receive from us. Opt-out requests can take up to ten business days to be effective.

To opt out of text messages, reply "STOP" to the message you received.

If we engage in sending you push notifications or in-app messages, we will allow control for those in our apps' settings.

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## **INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION**

We endeavor to provide you with the same level of service that you have come to expect from APC whether you are in Dallas, Paris or Seoul. To provide this service, you acknowledge that we may share your personal information among members of the APC portfolio of brands, our service providers, and other third parties, which may be located in countries outside of your own. Although the data protection laws of various countries may differ from those in your own country, we will take appropriate steps to ensure that your personal information is handled as described in this Statement and in accordance with the law.

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## **DATA RETENTION PERIODS**

We retain personal information about you necessary to fulfill the purpose for which that information was collected or as required or permitted by law. When we destroy your personal information, we do so in a way that prevents that information from being restored or reconstructed.

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## **CHANGES TO THIS STATEMENT**

APC may modify this Statement from time to time. When we make material changes to this Statement, we will post a link to the revised Statement on the homepage of our site. To see when this Statement was last updated, look at the date at the top of the Statement. Any changes to our Statement will become effective when posted on the site. Use of the site, any of our products and services, and/or providing consent to the updated Statement following such changes constitutes your acceptance of the revised Statement then in effect.

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## **CONTACT INFORMATION**

If you have any questions or concerns, please contact us by sending an email to [info@assembledproducts.com](mailto:info@assembledproducts.com), by sending a letter to Assembled Products Corporation, Attn: Privacy Rights, 115 East Linden Street, Rogers, AR 72756, USA, or by calling our toll-free number: (800) 548-3373

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**APPENDIX**  
**ADDITIONAL PRIVACY PROVISIONS REGARDING PROCESSING OF PERSONAL**  
**INFORMATION OF RESIDENTS OF CERTAIN COUNTRIES AND US STATES**

This Appendix provides additional information for individuals residing in countries and U.S. states that have enacted privacy laws giving certain additional rights to residents of those jurisdictions. These countries include, but are not limited to, those in the European Economic Area (EEA), the United Kingdom and Switzerland, as well as Australia, Brazil, China, Israel, Japan, Nigeria and Turkey. This Appendix outlines certain additional information that APC is obligated to provide to you, as well as certain rights you have with respect to the processing of your personal information, pursuant to applicable local laws. This Appendix will control to the extent it conflicts with any provision in the main body of this Statement.

Controller and Data Protection: APC is the entity that processes your personal information and is responsible for Data Protection.

Purposes and Legal Basis for Processing

APC processes your personal information for the purposes set forth in the main body of this Statement.

The legal bases for APC's processing activities include processing such information as necessary to comply with our contractual obligations, compliance with our legal obligations, protecting the safety of our employees, vendor partners and others, for our legitimate business interests, and pursuant to your consent.

The particular legal basis for the processing of your personal information is based on the purpose for which such information was provided or collected:

**Account Participation:** We process the personal information obtained in connection with your establishing an account with us on the basis of our contractual relationship with you and in furtherance of our business interests, including to personalize your use of our services and applications, to communicate news and promotional items, and to deliver personalized advertising and content.

**Surveys:** Completion of surveys is voluntary – we process the information obtained from surveys on the basis of your consent and in furtherance of our business interests, including marketing, service improvements, and analytics.

**On-property Collection:** When you visit one of our properties, we collect your name, business entity name, along with the details of your stay (arrival and departure day and time), to comply with laws regarding your safety while a guest on our premises, and on the basis of our contractual relationship with you. We may also process such data for our business interests, including for marketing, service improvements, administration of programs, and analytics and service personalization, as described in the sections referenced above of our Global Privacy Statement.

We use closed circuit television and other security measures at our properties that may capture or record images of guests and visitors in public areas, as well as information related to your location while on our properties (via sign in/sign out procedures) for the protection of our staff, guests and visitors to our properties.

**Social Media:** Participation in APC-sponsored social media activities and offerings is voluntary - we process information obtained from social media participation on the basis of your consent and in furtherance of our related business interests, including for marketing, service improvements, and analytics and goods and service personalization, as described in the sections referenced above of our Global Privacy Statement.

**Promotions and Sweepstakes:** Participation in sweepstakes, contests and other promotional offerings is voluntary – we process the information obtained from such participation based on your consent and as necessary to administer the offering. We also use certain data for our business purposes, including for

marketing, service improvements, administration of programs, and analytics and service personalization, as described in the sections referenced above of our Global Privacy Statement.

**Direct Marketing:** We use your personal information to send you marketing messages on the basis of your consent. You may withdraw your consent for direct marketing communications at any time by following the unsubscribe instructions in the marketing message.

**Vendor, Service Partner, and other Opportunities:** We process this information on the basis of our contractual relationship with you and for our related business interests, including maintaining and promoting the APC brands and facilitating direct communication between properties within the APC portfolio of brands.

**WMBE Suppliers:** Participation in APC's surveys regarding supplier diversity is voluntary – we process this information based on your consent and for our related business interests, including ensuring non-discriminatory business practices.

**Retention:** We retain personal information about you for the time necessary to accomplish the purpose for which such information was collected, usually for the duration of any contractual relationship and for any period thereafter as legally required or permitted by applicable law. Our retention policies reflect the applicable statute of limitation periods and legal requirements.

**Data Subject Rights:** Residents of the EEA have the following rights:

**Access, Correction and Erasure Requests:** You have the right to:

- ask us to confirm whether we are processing your personal information
- receive information on how your data is processed
- obtain a copy of your personal information
- request that we update or correct your personal information
- request that we delete personal information in certain circumstances

*Right to Object to Processing*: You have the right to request that APC cease processing of your personal information:

- for marketing activities, including profiling for statistical purposes
- where such processing is based on our legitimate business interests, unless we can demonstrate a compelling legitimate basis for such processing or we need to process your personal information for the establishment, exercise or defense of a legal claim

*Right to Restrict Processing*: You have the right to request that APC limit the processing of your personal information:

- while APC is evaluating or in the process of responding to a request by you to update or correct your personal information where such processing is unlawful, and you do not want APC to delete your data
- where APC no longer requires such data, but you want us to retain the data for the establishment, exercise or defense of a legal claim
- where you have submitted an objection to processing based on our legitimate business interests, pending our response to such request
- Where we limit the processing of your personal information pursuant to your request, we will inform you prior to re-engaging in such processing.

*Data Portability Requests*: You have the right to request that we provide you or a third party that you designate with certain of your personal information in a commonly used, machine readable format. Please note, however, that data portability rights apply only to personal information that we have obtained directly from you and only where our processing is based on consent or the performance of a contract.

Submitting Requests: your requests may be submitted in writing to Assembled Products Corporation, Attn: Privacy Rights, 115 East Linden Street, Rogers, AR, 72756, USA. You may also update your personal information as provided in the main body of this Global Privacy Statement.

We will respond to all such requests within 30 days of our receipt of the request, unless there are extenuating circumstances, in which event we may take up to 60 days to respond. We will inform you if we expect our response to take longer than 30 days. Please note, however, that certain personal information may be exempt from such rights pursuant to applicable data protection laws. In addition, we will not respond to any request unless we are able to appropriately verify the requester's identity. We may charge you a reasonable fee for subsequent copies of data that you request.

If you have concerns about our data practices or the exercise of your rights, you may either contact Assembled Products Corporation, Attn: Privacy Rights, 115 East Linden Street, Rogers, AR, 72756, USA or the supervisory authority in the Member State of your residence.

Right to Withdraw Consent: You have the right to withdraw your consent to any processing that we conduct solely based on your consent (such as sending direct marketing materials to your personal email account). You may withdraw your consent to marketing activities by following the instructions on any marketing emails or contacting [info@assembledproducts.com](mailto:info@assembledproducts.com). For any other activities for which you have previously consented, you may write to us at Assembled Products Corporation, Attn: Privacy Rights, 115 East Linden Street, Rogers, AR, 72756 to withdraw such consent.

International Data Transfers: We may transfer the personal information we collect about you pursuant to the purposes described in this Statement to countries that have not been found by the European Commission to provide adequate protection. In particular, we process your personal information in the United States.

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