

## HALSTEAD PRIVACY POLICY FOR THE U.S.

**Last Updated: January 17, 2024**

HMTX understands how important privacy is to our customers. This Privacy Policy describes the kinds of personal information we may obtain online or in related marketing activities; how we may use that information; and who we may share that information with. We also explain the choices available to you regarding the collection and processing of your personal information and the steps we take to safeguard such information. You can also [contact us](#) if you have any questions about our privacy practices.

Please review this privacy policy carefully. By using our website, you accept the terms of this Privacy Policy. If you do not agree with any part of this Privacy Policy, please do not use our website. Whenever possible, we will provide you with advance written notice of our changes to this Privacy Policy.

### INFORMATION WE COLLECT

#### Types of Information

We collect various kinds of information that you provide to us as well as information we obtain from you when you purchase a HMTX product or create a Halstead Account. Some of the types of information that we collect include:

- contact information, such as your name, email address, postal address, and phone number;
- payment card information (including your name, card number, expiration date, and security code);
- user coupon or gift card number;
- date of birth;
- gender;
- information stored in or associated with your HMTX Account (including your Halstead Account profile, ID, username, and password);
- username and password for participating third-party devices, apps, features, or services;
- information you store on your device, such as photos, contacts, text logs, touch interactions, settings, and calendar information;

- location data such as the location of the mobile device or computer used to access our website derived from GPS or WiFi use, or the IP address of the mobile device or computer or internet service used to access our website.

### **Information we collect automatically**

Our website collects some data automatically when you use it. We may obtain information by automated means such as through browser cookies, pixels, web server logs, web beacons, and other technologies. These technologies help us (1) remember your information so you will not have to re-enter it, (2) track and understand how you use and interact with our the location of the mobile device or computer used to access our website(s) derived from GPS or WiFi use, or app(s), (3) manage and measure the usability of our website(s) or apps, (4) understand the effectiveness of our communications, and (5) otherwise enhance our website(s) or app(s).

Information we may collect automatically includes information about:

- your device, including MAC address, the IP address, log information, device model, hardware model, IMEI number, serial number, subscription information, device settings, connections to other devices, mobile network operator, web browser characteristics, app usage information, sales code, access code, current software version, MNC, subscription information, and randomized, non-persistent and resettable device identifiers, such as Personalized Service ID (or PSID), and advertising IDs, including Google Ad ID;
- your use of our website, including clickstream data, your interactions with our website (such as the web pages you visit, search terms, and the apps, services and features you use, download, or purchase), the pages that lead or refer you to our website, how you use our website, and dates and times of use of our website; and

Your browser may tell you how to be notified when you receive certain types of cookies or how to restrict or disable certain types of cookies. You can find out how to do this for your particular browser by clicking “help” on your browser’s menu or visiting [www.allaboutcookies.org](http://www.allaboutcookies.org). For of the mobile devices, you can manage how your device and browser share certain device data by adjusting the privacy and security settings on your device. Our website are not designed to respond to “do not track” signals received from browsers. Please note that without cookies, you may not be able to use or benefit from all of the features of our website, device or computer or internet service used to access our website.

### **How We Collect Information**

We collect information about you in the following ways:

- **Your use of our website** - We collect personal information from you when you purchase a HMTX product or create a Halstead Account, contact us for help or information or otherwise voluntarily provide your personal information to us.

- **Connecting with social media through our website.** Our website may offer you the ability to use Facebook Connect or other social media services in conjunction with our services. When you access our services through your Facebook or another social media account, we may, depending on your privacy settings, have access to information that you have provided to the social media platform. We may use this information for the purposes described in this Privacy Policy or at the time the information was collected.
- **From Our Business Partners and Service Providers.** Third parties that assist us with our business operations also collect information about you through our website and share it with us. For example, our vendors collect and share information with us to help us detect and prevent fraud.
- **From cookies and other data collection tools.** Cookies are small text files that are used to store or retrieve information to perform certain functions and remember visits to a website. We use information gathered from cookies to help improve your experience on our website, for security and to personalize content and advertising. For example, they help us to identify and customize the experience for you, or to determine the most relevant related products to show you when you're browsing. If you do not want to accept a cookie you can use your in-built browser or device settings to deny or accept individual or all cookies. Please be aware that some functionality on our websites requires the use of cookies, and as such, disabling these may result in a deterioration of service (for example, when adding products to your basket for checkout).

### **Third-Party Web Analytics Services**

Through our website, we may collect personal information about your online activities on websites and connected devices over time and across third-party websites, devices, apps, and other online features and services. We may use third-party analytics services on our website, such as Google Analytics. The information we obtain may be disclosed to or collected directly by these providers and other relevant third parties who use the information, for example, to evaluate use of our website or help administer our website. To learn more about Google Analytics, please visit <https://www.google.com/policies/privacy/partners/>.

### **Online Tracking and Interest-Based Advertising**

Because HMTX participates in various advertising networks, you may also see our ads on other websites or mobile apps. Ad networks allow us to target our messaging to users considering demographic data, users' inferred interests, and browsing context. These networks can track users' online activities over time by collecting information through automated means, including through the use of browser cookies, web beacons, pixels, device identifiers, server logs, and other similar technologies. The networks use this information to show ads that may be tailored to individuals' interests, to track users' browsers or devices across multiple websites and apps, and to build a profile of users' online browsing and app usage activities.

To learn how to opt out of ad network interest-based advertising in the U.S., please visit [www.aboutads.info/choices](http://www.aboutads.info/choices) and <http://www.networkadvertising.org/choices/>.

We may combine information we obtain about you for the purposes described above. We also may use the information we obtain in other ways for which we provide specific notice at the time of collection or otherwise with your consent.

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

We may use the information we collect for any of the following purposes:

- to provide our services to you;
- to operate, improve and personalize the products and services we offer, and to give each user a more consistent and personalized experience when interacting with us;
- for customer service, security, to detect fraud or illegal activities, or for archival and backup purposes in connection with the provision of our services;
- to communicate with you;
- to better understand how users access and use our services, for the purposes of trying to improve the services and to respond to user preferences, including language and location customization, personalized help and instructions, or other responses to users' usage of the services;
- to help us develop our new products and services and improve our existing products and services;
- to provide users with advertising and direct marketing that is more relevant to you;
- to enforce our Terms of Service or other applicable policies; and
- to assess the effectiveness of and improve advertising and other marketing and promotional activities on or in connection with the Services. For example, personal information collected through our website may be used to suggest particular content that can be made available to the user on another of our services or be used to try to present more relevant advertising in another of our services.

### **How We Share and Disclose Your Information**

We may share and disclose information as described at the time information is collected or as follows:

- to service providers that process payments, handle marketing communications, provide technical support, conduct surveys, or perform other services for us;
- to business partners when you have elected to receive communications from them;
- to business partners that engage in interest-based advertising;
- as required by law, such as to comply with a subpoena or other legal process;

- as necessary to process transactions and provide you with the services, products, or information you request or purchase;
- when we have a good faith belief that disclosure is necessary to protect the rights or property of our affiliates or us, or to protect the safety of you or others;
- to detect, prevent, or respond to potential fraud, intellectual property infringement, violations of our Terms of Service, violations of law, or other misuse of our services;
- to proceed with the negotiation or completion of a merger, acquisition, sale, or other transfer of all or part of our assets; or
- subject to your consent.

Please note, we do not share your credit card information or other financial information to third parties for their marketing purposes or other independent use. When we share information with third parties for processing credit card or other payments, we require those third parties to comply with applicable Payment Card Industry standards.

### **Information Storage and Security**

We retain information as long as it is necessary and relevant for our operations. We also retain personal information to comply with applicable law, prevent fraud, resolve disputes, troubleshoot problems, assist with any investigation. After it is no longer necessary for us to retain information, we dispose of it according to our data retention and deletion policies.

We maintain safeguards designed to protect personal information we obtain through our website. Appropriate controls such as restricted access are placed on our computer systems. We limit access to our computer systems to select employees that are required to access personal information to perform their job. We also use safeguards such as limiting IP and two-factor authentication to further control access. In relation to online payments made through our website, we leverage a hosted PCI compliant solution through Braintree. We also perform regular testing and code reviews on our website.

Please note, however, the security of information transmitted through the internet can never be guaranteed. We are not responsible for any interception or interruption of any communications through the internet or for changes to or losses of data. Users of our website are responsible for maintaining the security of any password, user ID or other form of authentication involved in obtaining access to password protected or secure areas of any of our digital services. In order to protect you and your data, we may suspend your use of any of our website, without notice, pending an investigation, if any breach of security is suspected. Access to and use of password protected and/or secure areas of any of our website are restricted to authorized users only. Unauthorized access to such areas is prohibited and may lead to criminal prosecution.

## Your Rights

It is important to us that you are able to access and review the personal information we have about you and make corrections to it or delete it, as necessary. You can visit your account to manage and correct the information we have on file about you. To update your preferences, limit the communications you receive from us, or submit a request, please [contact us](#).

Our website may offer choices related to the collection, deletion, and sharing of certain information and communications about products, services, and promotions that are unique to specific services. You can access the relevant settings of each service to learn about choices that may be available for that service. If you decline to allow our website to collect, store, or share certain information, you may not be able to enjoy full use of all of the features available through our website.

## Links to Third Party Services

Our website may contain links to third-party websites and services ("*Third Party Services*") with which we have no affiliation. A link to any Third Party Service does not mean that we endorse it or the quality or accuracy of information presented on it. If you decide to visit a Third Party Service, you are subject to its privacy policy and practices and not this Privacy Policy. We encourage you to carefully review the legal and privacy notices of all other digital services that you visit.

## Disclaimer: Not Child-Directed

This website is not intended for use by children. If you are under the age of majority in your place of residence, you may use the website only with the consent of or under the supervision of your parent or legal guardian.

Consistent with the requirements of the Children's Online Privacy Protection Act (COPPA), if we learn that we have received any information directly from a child under age 13 without first receiving his or her parent's verified consent, we will use that information only to respond directly to that child (or his or her parent or legal guardian) to inform the child that he or she cannot use the website and subsequently we will delete that information.

## How To Contact Us

You can [contact us](#) to update your preferences, update or correct your information, submit a request, or ask us questions.

## **Notice to California Residents**

If you are a California consumer, for more information about your privacy rights, please see the section of this Privacy Policy called California Consumer Privacy Notice below.

### **CALIFORNIA CONSUMER PRIVACY NOTICE**

This California Consumer Privacy Notice supplements the HMTX Privacy Policy for the U.S. It applies solely to California consumers and addresses personal information we collect online and offline. This Notice does not apply to HMTX personnel or job applicants.

This California Consumer Privacy Notice uses certain terms that have the meaning given to them in the California Consumer Privacy Act of 2018 and its implementing regulations (the "CCPA").

### **Notice of Collection and Use of Personal Information**

We may collect the following categories of personal information about you:

- Identifiers: identifiers such as a real name, alias, postal address, unique personal identifier (such as a device identifier; cookies, beacons, pixel tags, mobile ad identifiers and similar technology; customer number, unique pseudonym, or user alias; telephone number and other forms of persistent or probabilistic identifiers), online identifier, internet protocol address, email address, account name, and other similar identifiers
- Additional Data Subject to Cal. Civ. Code § 1798.80: signature, bank account number, credit card number, debit card number, and other financial information
- Protected Classifications: characteristics of protected classifications under California or federal law, such as age and sex
- Commercial Information: commercial information, including records of personal property, products or services purchased, obtained, or considered, and other purchasing or consuming histories or tendencies
- Online Activity: Internet and other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with websites, applications, or advertisements
- Geolocation Data
- Sensory Information: audio, electronic, visual, and similar information
- Inferences: inferences drawn from any of the information identified above to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

We may use the categories of personal information listed above for certain business or commercial purposes, as described in this list:

- performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, providing analytics services, or providing similar services.
- auditing related to a current interaction with you and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance.
- short-term, transient use, including, but not limited to, the contextual customization of ads shown as part of the same interaction.
- detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- debugging to identify and repair errors that impair existing intended functionality; and
- undertaking internal research for technological development and demonstration

## Your Rights

As a California resident, you have certain choices regarding our use and disclosure of your personal information, as described below:

**Access:** You may have the right to request, twice in a 12-month period, that we disclose to you the personal information we have collected, used, disclosed, and sold about you during the past 12 months.

**Deletion:** You have the right to request that we delete certain personal information we have collected from you.

**Opt-Out of Sale:** You have the right to opt-out of the sale of your personal information.

**Statistics:** You have the right to request metrics relating to consumer privacy rights requests we received last year.

**Shine the Light Request:** You also may have the right to request that we provide you with (1) a list of certain categories of personal information we have disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year and (2) the identity of those third parties.

You can exercise any of these rights by contacting our legal team in writing by email or post using the details outlined below. When you contact us to ask about your information, we may ask you to identify yourself. This is to help protect your information. In all communications, please include the email address used for registration (if applicable), the website address, mobile application, or the specific HMTX program to which you provided personal information and a detailed explanation of your request. If you would like to delete, amend, or correct your personal information and are contacting us by email, please put "Deletion Request" or "Amendment/Correction Request" in the subject line of the email. We will respond to all

reasonable requests in a timely manner and may need to further confirm your identity in order to process certain requests.

Our email is [legalteam@hmtx.global](mailto:legalteam@hmtx.global).

Our registered address is:

Legal Team  
HMTX Industries LLC  
29 Oakwood Avenue  
Norwalk  
06850  
CT

### **Verifying Requests**

To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your personal information or complying with your request. If you have a Halstead Account, we will verify your identity by requiring you to sign into your account. If you do not have a Halstead Account, or an email address on file with us, then there is no reasonable method by which we can verify your identity to the level of certainty required by the CCPA. If you do not have a Halstead Account or an email address on file, and you request access to or deletion of your personal information, we will not be able to process your request at this time.

Should you exercise any of your privacy rights as a California resident, HMTX will not discriminate against you by offering you different pricing or products, or by providing you with a different level or quality of products, based solely upon this request. Certain HMTX services, however, may require your consent to have your personal information shared with HMTX to provide the service or to allow us to use and disclose your Personal Information to provide the service. When you exercise your rights, you may lose access to certain aspects of HMTX services that require your personal information to perform the service.