



## **Privacy Policy**

Last modified: September 14, 2022

### **Introduction**

Brooks Betts LLC (“Company” or “we”) respect your privacy and are committed to protecting it through our compliance with this privacy policy (this “Privacy Policy”).

This Privacy Policy describes the types of information we may collect from you or that you may provide when you visit <https://www.brooksbetts.com> (this “Site”) and our practices for collecting, using, maintaining, protecting, and disclosing such information.

This Privacy Policy applies to information that we collect on this Site and in email, text and other electronic messages between you and this Site. It does not apply to information collected by:

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

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we treat it. By accessing or using this Site, you agree to this Privacy Policy. Therefore, if you do not agree with our policies and practices, you must not access or use this Site. This Privacy Policy may change from time to time as set forth more fully below. Your continued use of this Site after we make changes is deemed to be acceptance of those changes, so please check this Privacy Policy periodically for updates.

### **Children Under the Age of 18**

This Site is not intended for children under 18 years of age. No one under the age 18 may provide any information to or on this Site. We do not knowingly collect information from children under 18. If you are under 18, do not use or provide any information through this Site, or provide any information about yourself to us, including your name, address, telephone number, or email address. If we learn we have collected or received Personal Information (as defined below) from a person under 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 18, please contact us at the email listed at the bottom of this Privacy Policy.

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

We collect several types of information from and about users of this Site, including information:

- By which you may be personally identified, such as name, postal address (including shipping and billing address), payment information (including credit card numbers), e-mail 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, such as the individual web pages or products that you view, what websites or search terms referred you to this Site, cart information, and information about how you interact with this Site (collectively, with Personal Information, your “Information”); and/or
- About your internet connection, the equipment you use to access this Site, and usage details.

We collect this Information:

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

## **Information You Provide to Us**

The Information we collect on or through this Site may include:

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

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

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

- Details of your visits to this Site, including traffic data, location data, logs, and other communication data and the resources that you access and use on this Site.

- 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).

The information we collect automatically may include Personal Information or we may maintain it or associate it with Personal Information we collect in other ways or receive from third parties. It helps us to improve this Site 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 this Site according to your individual interests.
- Speed up your searches.
- Recognize you when you return to this Site.

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 this Site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to this Site.
- **Web Beacons.** Pages of this Site 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 Site statistics (for example, recording the popularity of certain Site content and verifying system and server integrity).
- **Flash Cookies.** Certain features of this Site may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on this Site. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, 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 protect and improve this Site;
- To present this Site 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 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 this Site or any products or services we offer or provide through it;
- To allow you to participate in interactive features on this Site;
- To ensure you are in compliance with our General Terms and Conditions;
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses;
- To send you occasional newsletters and updates;
- In any other way we may describe when you provide the information; and
- 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 send us an email request at the address located at the bottom of this Privacy Policy. For more information, see Choices About How We Use and Disclose Your Information.

### **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 Information that we collect or you provide as described in this Privacy Policy:

- To our subsidiaries, parents and affiliates;
- To contractors, service providers, and other third parties we use to support our business (including without limitation Google Analytics);
- 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 Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by the Company about this Site users is among the assets transferred;
- To fulfill the purpose for which you provide it;
- For any other purpose disclosed by us when you provide the information; or
- With your consent.

We may also disclose your 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 [General Terms and Conditions](#) and other agreements, including for billing and collection purposes; and
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the 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 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 sending an email request to the address at the bottom of this Privacy Policy.
- **Promotional Offers from the Company.** If you do not wish to have your contact information used by the Company to promote our own or third parties' products or services, you can opt-out by sending an email request to the address located at the bottom of this Privacy Policy.
- **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 by sending an email request to the address located at the bottom of this Privacy Policy.

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 Site.

Like many other companies, we do not honor DNT flags but instead, offer other choices with respect to third parties. Many third parties participate in self-regulation to offer you a choice regarding receiving targeted ads. On the web, you can opt out of participating companies by visiting the following sites:

- <http://optout.networkadvertising.org>
- <http://optout.aboutads.info>

For options on other platforms or devices, please see their respective privacy policies to learn about the choices they offer.

### **Your State Privacy Rights**

State consumer privacy laws may provide their residents with additional rights regarding our use of their Personal Information. For example, 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; and
- 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; and
- Opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects.

To exercise any of these rights please send an email request to the address located at the bottom of this Privacy Policy.

### **Data Security**

We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure.

The safety and security of your information also depends on you. If we have given you (or where you have chosen) a password for access to certain parts of this Site, 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 this Site. 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 this Site.

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

It is our policy to post any changes we make to our Privacy Policy on this page. If we make material changes to how we treat our users' Personal Information, we will notify you through a notice on this Site home page. The date this 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 this Site and this Privacy Policy to check for any changes.

### **Contact Information**

To ask questions about this Privacy Policy and our privacy practices, contact us at [hello@brooksbetts.com](mailto:hello@brooksbetts.com).