



PRIVACY POLICY

Effective Date: October 5, 2020

Last Updated: November 30, 2020

SCOPE

This Privacy Policy (“Policy”) describes how Apex Tool Group, LLC, its subsidiaries and affiliates (collectively, “ATG,” “we,” or “us”) treats personal information on our websites and other online platforms where this Policy is located (collectively, our “Platform”).

If you are a California or Nevada resident, you may view our California and Nevada privacy notices [here](#).

TYPES OF INFORMATION WE COLLECT

We collect information from you and about you. Here are some examples of the information we may collect:

- **Contact Information.** For example, we may collect your name, home address, telephone number and email address. We may also collect your mobile phone number.
- **Billing Information.** For example, we may receive your billing and shipping addresses.
- **Information You Submit.** We may collect information when you send us a message through the “Contact Us” page or similar features on our Platform. We may also collect other information you submit through an online comment or when you contact our sales or support teams.
- **Business Information.** For example, we may collect your business contact information. We may also collect information about your employer and your job title.
- **Demographic Information.** We may collect demographic information such as your birthdate, age, and zip code.
- **Device Information.** For example, we may collect the type of device you use to access our Platform. We may also collect your device identifier, IP address or mobile operating system.
- **Account Information.** Certain portions of the Platform allow you to create a user account. In connection with that account, we may collect your user name and password.
- **Commercial Information.** We may collect personal information that could identify you and relates to the products or services in which you are interested, have purchased, or have considered or purchased. We may also collect personal information about your purchasing habits, or consuming history or tendencies.
- **Usage Information.** We may collect information regarding how you use the Platform. For example, we may collect information regarding what Platform features are useful or most frequently used.
- **Technical Information.** If you use our website, we may collect information about the browser you are using. We might look at what site you came from, or what site you visit when you leave us.



HOW WE COLLECT YOUR INFORMATION

We collect your information in different ways. Below are some examples of how we may collect your information.

- **Directly From You.** For example, when you:
 - Register for an account.
 - Purchase our products and services.
 - Submit an inquiry to us.
 - Sign-up for one of our events.
 - Request a product demonstration.
 - Download our product materials.
 - Complete an online form.
 - Contact our sales or support team.
 - Interact with our social media pages.
 - Otherwise interact with us.
- **Passively.** For example, when you visit and navigate our Platform on any device or click on a sponsored link or third-party advertisement. We may also collect information about users over time and across different websites and devices when you use the Platform.
- **From Third-Parties.** We may receive information about you from other sources. For example, this may include receiving information from:
 - Our business partners, including online advertising networks and analytics vendors.
 - Social media sites, including Facebook, Twitter, YouTube, Pinterest, Snapchat and Instagram.
 - Your contacts who provide your information to us because they think you may be interested in our products and services or they want to share a product or service with you.
 - Companies that provide information to supplement what we already know about you, including data aggregators. Certain third-parties might link your name or email address to other information they have collected. That might include online usage information.
- **By Combining Information.** For example, we may:
 - Combine information that we collect offline with information we collect through our Platform.
 - Combine information we collect about you from the different devices you use to access our Platform.
 - Combine information we get from third-parties with information we already have about you.



HOW WE USE YOUR INFORMATION

We process your personal information for the following purposes:

- **To Provide Our Products and Services.** This includes fulfilling your requests for our products and services.
- **To Customize Your Experience With Us.** This may include displaying products that may be of interest to you.
- **To Run and Improve Our Platform and Business.** We may use your information to make our Platform and business better. We may also use your information to provide you with information about our business.
- **To Provide Customer Support.** This includes responding to customer service and support requests.
- **To Respond to Your Requests or Questions.** This may include responding to your feedback.
- **To Communicate With You.** We may communicate with you about your account or our relationship. We may also contact you about this Policy or our Platform terms and conditions.
- **For Marketing Purposes.** We may provide you with information about our company and our business initiatives. This includes using your information to personalize your experience on our Platform and with our products. We may also engage in online behavioral advertising and retargeting. For more information about your choices related to these communications, see the **Choices Regarding Your Information** section below.
- **For Administrative Purposes.** This includes using your information for accounting, record keeping, backup, and administrative purposes
- **For Security Purposes.** This could include protecting our company and consumers who use our products and services. It may also include protecting our Platform.
- **As Otherwise Permitted By Law or As We May Notify You.**

HOW WE SHARE YOUR INFORMATION

We may share your information in the following ways:

- **Internally.** We may share your information with our parent, subsidiary, and affiliate entities.
- **With Our Service Providers.** We may share your information with third-parties who perform services on our behalf. For example, this may include companies that send emails on our behalf or help us run our Platform.
- **With Our Business Partners.** For example, this may include data aggregators, advertisers, media buying agencies, advertising networks and advertising service providers.
- **With Third-Parties for Marketing Purposes.** This may include third-parties in whose products or services we believe you may be interested. These third-parties may also share your information with others. These third-parties may use your information for their own marketing purposes or the marketing purposes of others. This may include the delivery of interest-based advertising.



- **With Any Successors to All or Part of Our Business.** For example, if we merge with, acquires or is acquired, or sells part of its business to another entity. This may include an asset sale, corporate reorganization or other change of control.
 - **To Comply With the Law or To Protect Ourselves.** For example, this could include responding to a court order or subpoena. It could also include sharing information if a government agency or investigatory body requests. We might share information when we are investigating a potential fraud.
 - **Where You Have Asked Us to Share Your Information With a Third-Party**
 - **For Other Reasons We May Describe to You.**
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CHILDREN UNDER 18

The Platform where this Policy is located are meant for adults. We do not knowingly collect personally identifiable data from persons under the age of 18, and strive to comply with the provisions of COPPA (The Children’s Online Privacy Protection Act). If you are a parent or legal guardian and think your child has provided us with information, please contact us at DataPrivacy@ApexToolGroup.com . You can also write to us at the address listed at the end of this Policy. Please mark your inquiries “COPPA Information Request.” Parents, you can learn more about how to protect children's privacy on-line [here](#).

CHOICES REGARDING YOUR INFORMATION

You have certain choices about how we use your information. Certain choices you make are browser and device specific.

Marketing Communications:

You can opt out of receiving our marketing communications by using the unsubscribe link within each email. Note that, as long as you maintain an account with us or receive Services, you will continue to receive administrative messages from us regarding your account and the Services.

Cookies & Other Tracking Technologies:

- **Cookies:** You can adjust your browser to control cookies to require your affirmative acceptance for new cookies, automatically reject cookies and/or delete or disable existing cookies. How you do this depends on the type of cookie and the browser that you are using. For more information on how to control browser cookies, [click here](#). If information about your browser is not available through this page, please search your browser for instructions about how to opt-out of cookie collection.
- **Flash Cookies:** You may need to take an additional action to manage flash cookies, which you can learn more about [here](#). Why? Because flash cookies cannot be controlled through your browser settings.
- **Google Analytics:** We may use Google Analytics on our Platform to help us understand how you use our Platform. You can learn about how to opt-out of Google Analytics [here](#).
- **Email Tools:** You can also change your email settings to block the automatic download of images in email messages, as such images may contain technologies that help us understand how you interact with the message.



- **Our Do Not Track Policy: Some browsers have “do not track” features that allow you to tell a website not to track you. These features are not all uniform. We do not currently respond to those signals.** If you block cookies, certain features on our sites may not work. If you block or reject cookies, not all of the tracking described here will stop.
- Note that deleting or blocking cookies may impact your experience on our website, as some features may not be available. Certain options you select are browser and device specific.

California and Nevada Privacy Rights

- If you are a California or Nevada resident, you may view our California and Nevada privacy notices [here](#).

Other Rights

- You may also have the right to assert a legal right regarding our collection and use of your information under applicable federal, state, and international law. Under these applicable laws, you may have a number of rights, including:
 - The right not to provide your personal information to us;
 - The right to object, stop, or limit the processing of your personal information;
 - The right to request the erasure or restriction of processing of your personal information in our possession;
 - The right to have your information transferred to another data controller;
 - The right to withdraw your consent;
 - The right to access to your information and request from us a description, or a copy, of the types of personal information we have stored about you; and
 - The right to request update or rectification your personal information.
- To exercise any of these rights, or to request more information, contact us at DataPrivacy@ApexToolGroup.com or through the contact information listed at the bottom of this policy.

SECURITY

We take appropriate steps to preserve the security of your personal information, including preventing them from being distorted, damaged or disclosed to unauthorized third-parties. We use reasonable means to safeguard personal information under our control.

However, the Internet is not 100% secure. We cannot promise that your use of our Platform will be completely safe. We encourage you to use caution when using the Internet. A username and a password are needed to access certain areas of our Platform. Consequently, it is your responsibility to protect your username and password.

STORAGE AND TRANSFER OF INFORMATION



Information we maintain may be stored in or outside of the United States (“U.S.”). Any information stored in the European Union (“EU”) are only retained for as long as they are needed. If you live outside of the U.S., you understand and agree that we may transfer your personal information to the U.S. or non-EU countries, in connection with the purposes set out in this Policy. This Platform is intended for use in the U.S. and is subject to the laws of the U.S., which may not provide the same level of protections as those in your own country. For this reason, we may transfer your personal information to other countries that may have different laws and data protection compliance requirements to those that apply in the country in which you are located.

Where we transfer your personal information collected in the EU to the U.S. or to another non-EU country, under circumstances that are within scope of General Data Protection Regulation (“GDPR”), which are not in adequate jurisdictions, we take steps as required by applicable law to protect the privacy and security of personal information.

LINKS

Our Platform may contain links to other third-party sites that are not governed by this Policy. If you click on a link to a third-party site, you will be taken to a site we do not control. We are not responsible for the privacy practices used by third-party sites. We suggest that you read the privacy policies of those sites carefully. We are not responsible for these third-party sites.

HOW TO CONTACT US

If you have any questions, comments or concerns with respect to our privacy practices or this Policy, or wish to update your information, please feel free to contact us at DataPrivacy@ApexToolGroup.com or by telephone at 980-441-4068 . You may also write to us at the following address:

Apex Tool Group, LLC,
Attn: Chief Compliance Officer,
1000 Lufkin Road,

Apex, NC 27539
Re: ATG Privacy Policy

CHANGES IN POLICY

From time to time, we may change our Policy. We will notify you of any material changes to our Policy as required by law. We will also post an updated copy on our Platform. Please check our Platform periodically for updates.