
PRIVACY POLICY – YOUR PRIVACY RIGHTS

Last Updated: June 30, 2020

SCOPE

Total Safety US, Inc. and its wholly owned affiliates (“Total Safety,” “we,” or “us”) respect your privacy concerns. This Privacy Policy (“Policy”) describes how we treat personal information we obtained about you, including through our websites, mobile applications, and platforms where the Policy is located (the “Platform”).

If you are a California resident, please [click](#) here to view our **CALIFORNIA PRIVACY NOTICE**.

If you are a Nevada resident, please [click](#) here to view our **NEVADA PRIVACY NOTICE**.

The Platform is operated in the United States and intended for use by individuals who are located in the United States. If you are from the United Kingdom or the European Union, please visit our [European Site](#), which has a separate privacy policy.

TYPES OF PERSONAL INFORMATION WE OBTAIN

Total Safety obtains personal information that you voluntarily provide to us when expressing interest in obtaining information on our products and services, when submitting applications for employment or otherwise contacting us or interacting with our Platform.

The personal information obtained depends on the context of your interactions with us and may include the following:

- identifying information, such as your name, mailing address, unique personal and online identifiers, telephone number, email address, and mobile phone number;
 - employment information, such as the personal information you include in your application if you apply for a job with us, which may include the name and address of your employer and your employment history, and information about your education history;
 - personal information you post in a public space on our Platform, such as when you send us a message through the “Contact Us” page or similar features;
 - demographic information, such as your birthdate, age, gender and zip code;
 - commercial information, such as personal information that could identify you and relates to the products or services in which you are interested or have considered or purchased;
 - device information, such as the type of device or identifier you use to access our Platform, IP address or operating system;
 - location, including the precise location information from your device, including collecting this information in the background when our mobile applications are not in use;
 - internet information, such as the browser you are using to access our website or your browsing or search history, the site you came from, the site you visit when you leave us, or how you interact with an advertisement; and
 - If you use our app, we might look at how often you use the app and where you downloaded it.
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HOW WE OBTAIN PERSONAL INFORMATION

Total Safety obtains your personal information in different ways. Below are some examples of how we may obtain your personal information.

- Directly from you. For example, when you:
 - submit a request to, or engage with, our customer service team;

- request product information or solicit a quote;
- interact with our social media pages or the Platform;
- apply for a job through our Platform or other channels;
- fill out a form on our Platform; and
- otherwise communicate with us.
- Passively. For example, when you:
 - visit and navigate our Platform on any device;
 - install and use our mobile app; and
 - enable location-based features on our Platform.

We may also collect personal information about users over time and across different websites, apps, and devices when you use the Platform. Third parties also collect personal information this way on our Platform.

- From third parties. For example:
 - our business partners, including online advertising networks and analytics vendors; and
 - social media sites, including Facebook, Twitter, YouTube, and LinkedIn.
- By combining information. For example, we may:
 - combine personal information that we collect offline with personal information we collect through our Platform;
 - combine personal information we collect about you from the different devices you use to access our Platform; and
 - combine personal information we get from third parties with information we already have about you.

HOW WE USE PERSONAL INFORMATION

Examples of how we may use the personal information we obtain include:

- to provide our products and services, which may include fulfilling your requests for products or services and processing quotation requests;
- to communicate about our products, services, events, programs and new offerings, which may include sending alerts, industry updates, marketing communications and promotional notifications;
- to provide you with updates, which may include sending you technical notices, update notices, security alerts and support and administrative messages;
- to improve our products, services and Platform, and to customize your experience with us;
- to understand your interests, which may include monitoring and analyzing trends, usage and activities in connection with your use of the Platform;
- to perform data analytics, such as market research, customer segmentation, financial analysis, and evaluating the effectiveness of our marketing activities;
- to respond to your requests or questions, including responding to your feedback;
- to communicate with you about your account or our relationship, this Policy or our Platform terms and conditions;
- to verify your identity or determine your eligibility for some of our products and services;
- to evaluate your application if you apply for a job through our Platform;
- for marketing purposes, which may include advertising or providing you with information about products and offers, telling you about new features or updates, informing you about third party offers or products we think you might find interesting, sending you electronic communications, including through email or text message, engaging in interest-based advertising using information gathered across multiple websites, devices, or other platforms (for more information about your choices related to these communications, see the [Choices](#) section below);

- for security purposes, including include protecting our company and consumers who use our products and services, protecting our Platform or investigating a potential fraud; and
 - as otherwise permitted by law or as we may notify you.
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HOW WE SHARE PERSONAL INFORMATION

We do not sell or otherwise share personal information except as set forth below. We may share your personal information in the following ways:

- Internally. We may share personal information with our parent company, affiliates and subsidiaries.
 - With our service providers. We may share your personal information with third parties who perform services on our behalf, which may include companies that send emails on our behalf or help us run our Platform.
 - With Our Business Partners. For example, we may also share personal information with social media sites, advertisers and their networks and service providers.
 - With Third Parties for Marketing Purposes. These third parties may also share your personal information with others. This may include the delivery of interest-based advertising.
 - With any successors to all or part of our business or one of our brands. For example, if Total Safety merges with, acquires or is acquired, or sells a brand or part of its business to another business entity, which may include an asset sale, corporate reorganization or other change of control, or transferring our customer personal information as an asset or as part of a larger transaction.
 - To comply with the law or protect ourselves, which could include responding to a court order or subpoena, responding to a government agency or investigatory body request, or when we are investigating a potential fraud.
 - For other reasons we may describe to you at the time of collection.
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CHILDREN UNDER 16

The Platform where this Policy is located is meant for adults. We do not knowingly collect personally identifiable data from persons under the age of 16 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 under 16 has provided us with personal information, please contact us at privacy@totalsafety.com. You can also write to us at the address listed at the end of this website 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 personal information. Certain choices you make are browser and device specific.

Marketing Communications:

You can opt out of receiving our marketing communications. Note that you will still receive transactional messages from us, including information about your account and responses to your inquiries. To opt out of receiving our marketing communications, you can follow the instructions contained in the communication.

Cookies & Other Tracking Technologies:

- Your browser may give you the ability to control cookies or other tracking tools. How you do so depend on the type of tool. Certain browsers can be set to reject browser cookies. To control flash cookies, which we may use on certain websites from time to time, you can go [here](#). Why? Because flash cookies cannot be controlled through your browser settings.
- You may completely opt-out of all location-based information collection if you uninstall our mobile apps from your devices.

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.

CALIFORNIA PRIVACY NOTICE

The California Consumer Privacy Act (“CCPA”) requires us to make specific disclosures about how we collect, use and share the personal information of California residents who are subject to CCPA (“California Consumer Personal Information”). CCPA also grants such California residents certain rights related to their personal information.

This section of our Privacy Policy explains our online and offline collection of California Consumer Personal Information, and includes instructions for California residents who wish to exercise their rights under CCPA. Note that this section does not apply to the personal information of California residents that we collect in the employment context or in certain business transactions. This section also does not apply to any information that may be captured by our customers using our products or services.

We may collect this category of California Consumer Personal Information.	Do we use and share this category of personal information for “business purposes?”	Do we use and share this category of personal information for “commercial purposes?”
Identifiers	YES	YES
Customer records containing personal information	YES	NO
Characteristics of protected classifications under California or federal law	YES	NO
Commercial information	YES	NO
Internet or other electronic network activity information	YES	YES
Geolocation data	YES	YES
Audio, visual or similar information	YES	NO
Professional or employment-related information	YES	NO
Non-public personal education information	YES	NO
Inferences drawn from the above categories of information to create a profile about preferences	YES	YES

- We collect California Personal Information as described in the [“HOW WE OBTAIN PERSONAL INFORMATION”](#) section of this Policy
- We use the California Personal Information we collect for “business purposes” and “commercial purposes” as these terms are defined in CCPA. These purposes are as described in the [“HOW WE USE PERSONAL INFORMATION”](#) section of this Policy.
- We share California Personal Information we collect with third parties as described in the [“HOW WE SHARE PERSONAL INFORMATION”](#) section of this Policy. **However, as of the date of this Policy, we do not knowingly “sell” California Personal Information. This statement is based on our understanding of how the term “sell” is defined under CCPA as of the date of this policy.**

- **California resident rights under CCPA.** Subject to certain exclusions included in CCPA, and as relevant to our operations, California residents have the rights listed below. We may take steps to verify your identity, as permitted or required under CCPA, before we process your request.
 - **Access.** This means that you can request that we disclose to you the categories and specific pieces of personal information we have collected about you.
 - **Deletion.** This means that you can request that we delete any personal information about you which we have collected from you.
 - **Notice.** This means that you can request that we disclose the categories of personal information we collect about you; the sources from which such personal information is collected; the “business” or “commercial” purposes (as these terms are defined in CCPA) for collecting this personal information; the categories of third parties with whom the business shares personal information; and the specific pieces of personal information we have collected about you.
 - **Equal prices and services.** This means that we are prohibited from discriminating against you if you exercise your rights under CCPA.
- **California residents who wish to exercise their rights under this section can call us at privacy@totalsafety.com. You may also call us, toll-free, at 833-549-0484. Please indicate you are a California resident making a “CCPA” request. California residents may also appoint an agent to make such requests on their behalf. If an agent submits a request on your behalf, we may ask the agent to provide additional information to verify the authenticity of the request.**

Cal. Civ. Code 1798.83 (the “Shine the Light” law) grants our California resident customers the right to ask us one time each year if we have shared personal information with third parties for their direct marketing purposes. To make a request, please send us an email at privacy@totalsafety.com or write to us at the address listed below. Indicate in your email or letter that you are a California resident making a “California Shine the Light” inquiry.

NEVADA PRIVACY NOTICE

If you are a Nevada resident, under Privacy and Security of Personal Information Chapter of the Nevada Revised Statutes Section 603A (“603A”), you have the right to submit a verified request to us, directing us not to make any sale of certain personal information that we have collected or will collect about you. As of the date of this Policy, we do not knowingly engage in the “sale” of personal information of Nevada residents. This statement is based on our understanding of how the term “sale” is defined under 603A as of the date of this Policy. However, Nevada residents who wish to exercise their rights under this section can email us at privacy@totalsafety.com. Please indicate you are a Nevada resident making a “Nevada Opt-Out” request.

SECURITY

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. We use reasonable means to safeguard personal information under our control. A username and password are needed to access certain areas of the Total Safety Platform. It is your responsibility to protect your username and password.

STORAGE OF INFORMATION

Information we maintain may be stored in or outside of the United States. If you live outside of the United States, you understand and agree that we may transfer your personal information to the United States. This Platform is intended for use in the United States and is subject to the laws of the United States, which may not provide the same level of protections as those in your own country.

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 privacy@totalsafety.com. You may also write to us at the following address:

Total Safety US, Inc.
Attn: Privacy
3151 Briarpark Drive, Suite 500
Houston, TX 77042

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.