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## PRIVACY POLICY – YOUR PRIVACY RIGHTS

Last Updated: September 3, 2020

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### SCOPE

Total Safety US, Inc. and its wholly owned affiliates (“Total Safety,” “we,” or “us”) respect your privacy concerns. This Privacy Policy tells you how we collect, use, store, transfer and disclose your personal information, including through our websites, mobile applications, and platforms where the Policy is located (the “Platform”). By providing your information, you agree to your personal information being processed in accordance with this Privacy Policy, as amended from time to time.

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 and Canada. If you are from the United Kingdom or the European Union, please visit our [European Site](#), which has a separate privacy policy.

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### 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, company name and title within the company (where applicable), 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 as well as payment information;
  - 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.

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## 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 Regarding Your Information](#) section below);

- for security purposes, including 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, for example to respond to an emergency, or in the course of an investigation into illegal behaviour 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:

- a) Internally. We may share personal information with our parent company, affiliates, subsidiaries and employees. Only authorized personnel have access to personal information. These employees have been informed by us of their obligation to preserve the confidentiality of such personal information. Our employees who have access to such personal information may use it only in accordance with the principles set out in this Privacy Policy and applicable legislation and regulation.
- b) 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.
  - Business Partners. For example, we may also share personal information with social media sites, advertisers and their networks and service providers.
  - 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.

The information will be disclosed to the third parties listed above in order to assist us in providing services, it being understood that these third parties shall respect strict contractual conditions that oblige them to maintain the confidentiality of all the information and use it only for purposes related to the supply of services to us.

- 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) and other applicable privacy legislation. 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](mailto: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](#).

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## ANTI-SPAM

Where applicable, we will seek your express consent to contact you, including by way of commercial electronic messages. This consent is sought by Total Safety US, Inc and you can contact us at (713) 353-7100 or 3151 Briarpark Drive, Suite 500 Houston, TX 77042. You can unsubscribe at any time from receiving commercial electronic messages by following the instructions in the message. Even if you have opted out of receiving marketing communications from us, please be aware that we may still contact you for other purposes. For example, we may contact you to provide communications you have consented to receive, regarding the products or services we provide to you, or if you contact us with an inquiry.

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## COOKIES

We may use "cookie" technology to obtain non-personal information from visitors to the Platform. Cookies are pieces of information stored on a user's computer by a website so preferences are remembered on future requests. Pixel tags (also known as web bugs, web beacons, clear/invisible/tracker GIFs) are signals sent from certain websites or e-mails used to pass certain information to our servers to personalize the Website and to track your usage. We do not save personal information on cookies or through use of pixel tags without your permission. Rather, cookies and pixel tags are used to optimize the performance and functionality of the Platform, and to personalize the Platform for you and present you with content and offers specific to your interests. Most browsers accept cookies automatically, but can be configured not to accept them or to indicate when a cookie is being sent. See the "Choices Regarding your Information" section below for more information in this regard. We do not extract personal information in this process nor do we provide this information to third parties. Cookies allow us to customize your user interface to speed up the navigation process and to make the Platform experience more efficient. If your browser is configured to reject cookies, you will not be able to use the features of the Platform. When you log in, a cookie can tell us 47900831.2 whether you've visited us before or are a new visitor. We do use the cookie to help us identify Platform features in which you have the greatest interest, so that we can provide you with more of what you want.

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## ANALYTICS

We may also use third-party service providers to monitor and analyze the use of our Platform. Google Analytics is a web analytics service offered by Google Inc. ("Google") that tracks, monitors and reports traffic on our Website. Google tracks information like (i) your IP address; (ii) the type of web browser and operating system being used; (iii) the pages of the Platform that you visit; and (iv) other websites you may have visited before visiting our website. Google may also transfer this information to other third parties where they are required to do so by law, or where such third parties process the information on their behalf. You can opt-out of having your activity on the website made available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about a visitor's activity. For more information on Google's privacy practices, please visit: <https://policies.google.com/technologies/partner-sites>.

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## 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 depends 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 or access your device's location settings.

### **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.

**Interest-based advertising:**

- Our third party vendors or service providers may also use cookies and web beacons to measure the effectiveness of our ads and to determine the content and advertising to offer you based on your interests. To support these activities, we, our service providers, and business partners may use information about your visits to our Platform. You may opt out of other third-party vendor's use of cookies by disabling cookies on your browser or by visiting <http://youradchoices.ca/choices/> or [youradchoices.com](http://youradchoices.com). Please note that even if you choose to disable cookies you will still see advertisements while browsing online. However, the advertisements may be less relevant to you and your interests.

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## 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.

<b>We may collect this category of California Consumer Personal Information.</b>	<b>Do we use and share this category of personal information for “business purposes?”</b>	<b>Do we use and share this category of personal information for “commercial purposes?”</b>
<b>Identifiers</b>	YES	YES
<b>Customer records containing personal information</b>	YES	NO
<b>Characteristics of protected classifications under California or federal law</b>	YES	NO
<b>Commercial information</b>	YES	NO
<b>Internet or other electronic network activity information</b>	YES	YES
<b>Geolocation data</b>	YES	YES
<b>Audio, visual or similar information</b>	YES	NO
<b>Professional or employment-related information</b>	YES	NO
<b>Non-public personal education information</b>	YES	NO
<b>Inferences drawn from the above categories of information to create a profile about preferences</b>	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 email us at [privacy@totalsafety.com](mailto:privacy@totalsafety.com). You may also call us at 713-353-7100. 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](mailto: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.

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## 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](mailto:privacy@totalsafety.com). Please indicate you are a Nevada resident making a “Nevada Opt-Out” request.

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## SECURITY & RETENTION

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. We protect the personal information within our custody or control with appropriate organizational, technological and physical safeguards.

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.

We store personal information in electronic and physical files that are secure, and our security measures include secure on and off-site storage, restricted access to records and data processing equipment, password protocols, and encryption and security software. We conduct audits and monitor compliance with our privacy practices.

We only retain personal information for as long as is necessary for the purpose for which it was collected. When we no longer are required to retain the information, we will destroy, erase, or de-identify the information. Legal requirements, however, may require us to retain some or all of the personal information we hold for a period of time that is longer than that for which we might otherwise hold it.

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## **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.

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## **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.

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## **ACCESS, CORRECTION AND ACCOUNTABILITY**

We will strive to keep all personal information in our files complete, up-to-date and accurate. You or a person authorized on your behalf has the right to request changes or corrections to inaccurate or incomplete information. Please note that we may charge a minimal fee for processing such requests.

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 our Privacy Officer at [privacy@totalsafety.com](mailto: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

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## **CHANGES IN POLICY**

We may amend this Policy from time to time as we add new products and services, as we improve our current offerings, and as technologies change. If we make a change to this Privacy Policy this will be reflected in the above Last Update date. We encourage you to check back periodically to see if we have made any changes. If we make any material or substantive changes in this Privacy Policy, we will notify you by posting a clear and conspicuous notice of these changes on the Platform and in this Privacy Policy.