Fastshowerdoors.com, operated by "Sturbridge Supplies Inc" ("Sturbridge", "Company," "we," "our" or "us") is committed to protecting your privacy. This Privacy Policy explains how we collect, use, and share the personal information we collect from visitors to our websites, including www.fastshowerdoors.com, its subdomains, related domains, and all other websites where this Privacy Policy is posted. This policy includes but is not limited to personal information collected on our websites, mobile applications, via email, via phone, or controlled widgets embedded in communication platforms. By accessing or using our websites, you signify that you have read, understood and agree to our collection, storage, use and disclosure of your personal information as described in this Privacy Policy.

This Policy is in relationship with the general business functions of the organization and may include the products, services, support, information, education, and communication referred to in this policy as "Product(s)" and/or "Service(s)".

This Privacy Policy does not apply to any of our commercial partners (together "our Partners") and/or to any websites or other service providers to which the Fastshowerdoors website may link, who are independent of the Fastshowerdoors website. This is beyond our control and we recommend that you contact the "Partners" for further information on their respective privacy policies.

# A. Personal Data

Personal data is all information that is associated with a specific person and can be used to reasonably identify that person. Non-personal data, on the other hand, Nonpersonal data, on the other hand, is all information that is not personal data (including, but not limited to, any analytical data). Non-personal data also includes information we receive anonymously or under a pseudonym and therefore cannot be assigned to any natural person.

## **B.** Principle of Anonymity

When using the Fastshowerdoors.com website, you remain anonymous to us as long as you do not voluntarily provide us with personal data by registering for an account, placing an order with Fastshowerdoors.com (on-line or via the phone), subscribing to emails or newsletters, requesting information or communication directly from us to you, writing to us via our contact form, or applying for one of our job advertisements. Use of our website, however, may provide certain non-personal data as further described under paragraph four.

#### C. How We Collect and Use Information

We collect your personal data in order to provide you with a personalized, useful and efficient experience. The categories of information we collect can include:

## 1. Information that you provide to us.

We collect information that you provide to us when you set up an account with us, place an order with us, or communicate with us. For example, we may request your personal data (e.g., name, postal address, email address, telephone number) or your applicable business information when you register for an account or purchase our Products. We may also collect any communications that you exchange with us, as well as any information you provide if you take part in any interactive features of the Service (e.g., promotions, surveys, etc.). We collect information you may provide when providing content or commentary to our Service in the form of blog posts, comments, reviews and the like, which may be published on our website and viewable by the public.

## 2. Information we receive from social networking sites.

When you interact with our Service through various social media, such as when you login through Facebook, or share Company content on Facebook, Twitter, Pinterest, Instagram or other sites, we may receive information from the social network including your profile information, profile picture, gender, user name, user ID associated with your social media account, age range, language, country, friends list, and any other information you permit the social network to share with third parties. The data we receive is dependent upon your privacy settings with the social network. You should always review, and if necessary, adjust your privacy settings on third-party websites and services before linking or connecting them to our websites or Service.

# 3. Information from other sources.

We may obtain personal data from other sources, such as third-party information providers, or through mergers and acquisitions, and combine this with information previously collected. In these cases, our Privacy Policy governs the handling of the combined personal data.

We use this information to operate, maintain, improve and provide to you the features and functionality of the Service, as well as to communicate directly with you, such as to send you email messages about products and services that may be of interest to you. We may also send you Service-related emails or messages (e.g., account verification, purchase confirmation, changes or updates to features of the Service, technical and security notices). Similarly, if you request information from us through an online contact form or if you email us, we collect the information you provide (e.g., name, telephone number, email address) so that we can respond to you.

# D. Use of Cookies and Other Tracking Technology To Collect Information

We collect certain types of usage information when you visit our websites, read our emails, or otherwise engage with us or our Service. We typically collect this information through a variety of tracking technologies, including cookies, web beacons, file information and similar technology (collectively, "tracking technologies"). For example, we collect information about your device and its software, such as your IP address, browser type, Internet service provider,

platform type, device type, operating system, date and time stamp, a unique ID that allows us to uniquely identify your browser, mobile device or your account, and other such information. We may also collect information about the way you use our websites or Service, for example, the pages you visit, the links you click, how frequently you access the websites or Service, whether you open emails or click the links contained in emails, whether you access the websites or Service from multiple devices, and other actions you take on our websites or Service. When you access our Service from a mobile device, we may collect unique identification numbers associated with your device or our mobile application (including, for example, a UDID, Unique ID for Advertisers ("IDFA"), Google AdID, or Windows Advertising ID), mobile carrier, device type, model and manufacturer, mobile device operating system brand and model, phone number, and depending on your mobile device settings, your geographical location data, including GPS coordinates (e.g., latitude and/or longitude) or similar information regarding the location of your mobile device, or we may be able to approximate a device's location by analyzing other information, like an IP address. We may collect analytics data, or use third-party analytics tools, to help us measure traffic and usage trends for the Service and to understand more about the demographics of our users. We may also work with third-party partners to employ technologies, including the application of statistical modeling tools, which attempt to recognize you across multiple devices. Although we do our best to honor the privacy preferences of our users, we are unable to respond to Do Not Track signals set by your browser at this time.

In addition, we use cookies to help keep track of items you put into your shopping cart, including when you have abandoned your shopping cart. This information is used to determine when to send cart reminder messages via our SMS services.

We use or may use the data collected through tracking technologies to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the site; (b) provide custom, personalized content and information, including targeted content and advertising; (c) identify you across multiple devices; (d) provide and monitor the effectiveness of our Service; (e) monitor aggregate metrics such as total number of visitors, traffic, usage, and demographic patterns on our website; (f) diagnose or fix technology problems; and (g) otherwise to plan for and enhance our Service.

If you would prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) disable existing cookies; or (iii) set your browser to automatically reject cookies. Please note that doing so may negatively impact your experience using the websites, as some features and services on our websites may not work properly. Depending on your mobile device and operating system, you may not be able to delete or block all cookies. You may also set your e-mail options to prevent the automatic downloading of images that may contain technologies that would allow us to know whether you have accessed our e-mail and performed certain functions with it.

We may also use cookies and tracking technologies for advertising purposes.

### E. When We Share Personal Information

Fastshowerdoors.com does NOT sell, pass on, lend or otherwise transfer any customer information to third parties. Likewise, your personal data will not be passed on, sold or otherwise transferred to third parties. Anything to the contrary shall only apply if this is necessary for the execution of the notified or agreed purposes and is permitted under applicable data protection laws. We do utilize information for order fulfillment and to improve your experience interacting with us. For example:

#### 4. Fastshowerdoors.com Partners:

We share the personal data required to fulfil an order with our Partners. The data shared is the minimal information required for order fulfilment (name, postal details, relevant contact details, product details ordered)

#### 5. IT Service Providers:

We contracted various service providers to support us in the provision, operation and maintenance of our IT systems, including the Fastshowerdoors.com website. These include, for example, hardware and software suppliers, Google Inc (for the web analysis service Google Analytics), hosting providers or data centers. When such service providers work for us, they may be given access to your personal data as recipients. However, these service providers are then contractually obliged to comply with applicable data protection laws.

### 6. Other Third Parties:

We may share or disclose your personal data if we determine, in our sole discretion, that we are required to do so under applicable law or regulatory requirements, or if we reasonably believe disclosure is necessary to prevent harm or financial loss, or in connection with preventing fraud or illegal activity, and/or to enforce our Terms and Conditions.

#### 7. Parties to a Business Transaction:

We reserve the right to transfer any information we collect in the event we sell or transfer all or a portion of our business or assets (including any shares in the company) or any portion or combination of our products, services, businesses and/or assets. Should such a transaction occur (whether a divestiture, merger, acquisition, bankruptcy, dissolution, reorganization, liquidation, or similar transaction or proceeding), we will use reasonable efforts to ensure that any transferred information is treated in a manner consistent with this Privacy Policy.

## F. Control Over Your Information

### 8. Email Communications

Whether or not you have previously sent Fastshowerdoor an e-mail message, you consent to Fastshowerdoor's sending you e-mail messages and other electronic communications (a) in connection with your use of our website, (b) in the ordinary course of business, or (c) for any other legitimate business purpose (including, but not limited to, Fastshowerdoor's newsletter and other marketing materials). If you wish to unsubscribe from such emails, simply click the

"unsubscribe link" provided at the bottom of the email communication. Note that you cannot unsubscribe from certain Service-related email communications (e.g., account verification, confirmations of transactions, technical or legal notices).

### 9. Modifying Account Information

If you have an online account with us, you have the ability to modify certain information in your account (e.g., your contact information) through "profile," "account," "settings," or "preferences" options provided on the websites. If you have any questions about modifying or updating any information in your account, please contact us at the email, phone number or postal address provided below.

#### 10. Delete Personal Information

You may object at any time to the use of your personal data by contacting us at privacy@fastshowerdoors.com.

## G. Data Protection and Security

### 11. Data Retention

Following termination or deactivation of your User account, Fastshowerdoors may retain your data for commercially reasonable time for record keeping, audits or other purposes. Any Personal Data that we have access to shall be retained, stored, and deleted according to our agreement with our business Partners and Service Providers.

### 12. Data storage and transfer

Your information is stored and processed in the United States. If you are located in the European Union or other regions with laws governing data collection and use that may differ from U.S. law, please note that we will take all steps reasonably necessary to ensure that any personal data is treated securely and in accordance with this Privacy Policy.

### 13. Keeping information safe

Fastshowerdoors cares about the security of your information and uses commercially reasonable physical, technical and organizational measures designed to preserve the integrity and security of all information we collect. However, no security system is impenetrable, and we cannot guarantee the security of our systems 100%. In the event that any information under our control is compromised as a result of a breach of security, we will take reasonable steps to investigate the situation and where appropriate, notify those individuals whose information may have been compromised and take other steps, in accordance with any applicable laws and regulations.

## H. Your Right

Depending on where you live, you may have certain rights with respect to your information. For example, under local laws, you may be able to ask us to:

- 14. provide access to certain information we hold about you
- 15. update or correct your information
- 16. delete certain information
- 17. restrict the use of your information

We will respond within the time period prescribed by applicable law. Please note that many of the above rights are subject to exceptions and limitations. Some Services can be provided only if we have your information, therefore deletion of your information will result in termination of such Services.

#### I. California Residents

Fastshowerdoors.com does not sell any personal data. Fastshowerdoors.com will, to the extent required by the California Laws, disclose, delete or take any other action with respect to any personal data of residents of California. Residents of California may request from Fastshowerdoors.com (a "California Request" pursuant to the California Laws, among other things, that Fastshowerdoors.com:

#### 18. Disclose to such residents:

- i. The categories of personal data that are collected by Fastshowerdoors.com;
- ii. The categories of sources from whom or which personal data is collected by Fastshowerdoors.com.
- iii. The purposes for Fastshowerdoors.com's collecting personal data;
- iv. The categories of third parties to whom or which Fastshowerdoors.com transfers personal data;
- v. The specific pieces of personal data collected by Fastshowerdoors.com;
- vi. If personal data is sold or disclosed for a business purpose to a third party, the categories of such personal data that are sold or disclosed for a business purpose, and the categories of third parties to which or whom such personal data are sold or disclosed for a business purpose;

## 19. Except in certain circumstances, delete personal data of such residents.

Any California Request by a resident of California

- vii. can only be made twice in a 12-month period
- viii. will require the collection of certain information by Fastshowerdoors.com to verify the identity of such resident
- ix. can be submitted to Fastshowerdoors.com by contacting us at privacy@fastshowerdoors.com. We will respond to any such request within 45 days after receiving it.

The California Laws require certain additional disclosures that can be found at this link <u>California Privacy Disclosures</u>. Fastshowerdoors.com will not discriminate against a resident of California for exercising any right made available to such residents under the California Laws.

## J. Forms and account registrations

- 20. If you contact us via forms, you agree that your message with your given contact data may be processed by us for the purposes of the form you sent and for contacting you. You can also enter a pseudonym (also a fictional name) as the name.
- 21. We will only process the data you submit via forms in order to provide you with requested content, to process enquiries and to contact you. As long as we have received your contact data, which you provide via the contact form, only for these purposes, we will not use this personal data for any other purposes. Apart from cases in which we are legally obliged to do so, we will not pass on your contact data to third parties in this case.

## K. Online applications

- 22. If you contact us via our contact form for applications, you agree that your contact and application data including your possibly sent resume / CV may be processed by us for the purposes of processing your application and contacting you.
- 23. We will only process the contact and application data you submit via the contact form for applications in order to process your application and respond to you. As long as we have received your contact and application data, which you provide us with your application, only for processing, contacting and responding to your application, we will not use this personal data for any other purposes. Apart from cases in which we are legally obliged to do so, we will not pass on your contact and application data to third parties in this case.
- 24. As long as your application does not result in an employment relationship with us, you can revoke your consent at any time for the future. Your contact and application data will be stored after revocation for as long and to the extent that we are obliged to do so within the framework of the statutory retention obligations or we still need your personal data to carry out or process an existing contractual relationship or for purposes of proof.

## L. Use of Google Analytics

25. Google Analytics analyzes the traffic data on the Fastshowerdoors.com websites and collects various data about you and your user behavior on the Fastshowerdoors.com websites (e.g. which web browser you use, where you come from, which language setting you use, which search engines you use, date and time of your visit to the Fastshowerdoors.com websites, how long you stay on which page). Your IP address is only collected anonymously. Our use of Google Analytics is for the purpose of tracking user behavior on the Fastshowerdoors.com websites and to better understand it so that we can optimize our website and make a better offer available to users.

- 26. The Fastshowerdoors.com websites use functions of the web analysis service Google Analytics. The provider is Google Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043, USA. Google Analytics uses so-called "cookies". These are text files that are stored on your computer and allow an analysis of your use of the Fastshowerdoors.com websites. The information generated by the cookie about your use of this Fastshowerdoors.com website is usually transmitted to and stored by Google on servers in the United States.
- 27. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this Fastshowerdoors.com website. You can also prevent Google from collecting the data generated by the cookie and relating to your use of the Fastshowerdoors.com website (including your IP address) and from processing this data by Google by downloading and installing the browser plug-in available.
- 28. An opt-out cookie is stored on your computer to prevent future collection of your data when you visit the Fastshowerdoors.com Websites (but this does not apply to other websites you visit and other browsers you use on the same computer): Disable Google Analytics. This alternative is particularly suitable for mobile devices. If you choose to do so, do not delete the opt-out cookie. Otherwise, you will lose the protection provided by this opt-out cookie until you reinstall it.
- 29. Further information on the purpose and scope of data collection and processing by Google Analytics can be found in Google's privacy policy on the Google website. We are familiar with the following websites in this respect:
- https://policies.google.com/privacy?hl=en
- https://support.google.com/analytics/answer/6004245?hl=en
- http://www.google.com/analytics/terms/

# M. Use of embedded social media share buttons

- 30. We use embedded Social Media Share Buttons on the Fastshowerdoors.com websites, We display Social Media Buttons on the websites for the following social networks:
  - Facebook, www.facebook.com
  - Twitter, www.twitter.com
  - YouTube, www.youtube.com
  - Instagram, www.instagram.com
- 31. You recognize that the connection was established when a new window opens in your browser and loads a web page of the social network in which you would like to share

our blog or event post. This window is no longer part of our Fastshowerdoors.com websites, but is provided by the social network provider through which you wish to share the content. In the new browser window described above, you will be asked to log in with your social network user data. Once you are logged in, you can share your Fastshowerdoors.com website with another click. A click on one of these buttons means that you as a user give your consent to transmit data to the respective operator of the social network.

32. If you click the respective Social Media Share Button after its activation, personal data is automatically transmitted to the operator of the respective social network and stored there, i.e. with the respective provider in the USA. We have no influence on the data collected and data processing processes, nor are we aware of the full extent of data collection, the purposes and the storage periods. You know the operator of the social network by the respective logo. To the best of our knowledge, the operators of social networks save these data as user profiles in most cases and use them for the purposes of advertising, market research or demand-oriented design of their websites. Such analysis is used in particular to display personalized advertising and to inform other users of the social network about your activities on the Fastshowerdoors.com websites; this also applies to users of the respective social network who are not logged in. You can prevent your member information on that social network from being linked to the information the social network collects about you using the embedded Social Media Share buttons on the Fastshowerdoors.com websites by not activating the Social Media Share button on the Fastshowerdoors.com websites while you are logged in to the social network, but by logging out of the social network beforehand.

## N. Use of Additional Analytics and Tracking

- 33. In addition to Google Analytics, Fastshowerdoors.com may use internal and/or other third-party forms to analyze the traffic data on the Fastshowerdoors.com websites and collects various data about you and your user behavior on the Fastshowerdoors.com websites. Just as with Google Analytics outlined in section L, information such as which web browser you use, where you come from, which language setting you use, which search engines you use, date and time of your visit to the Fastshowerdoors.com websites, how long you stay on which page may be captured. The use of these tools are for the purpose of tracking user behavior on the Fastshowerdoors.com websites and to better understand it so that we can optimize our website and make a better offer available to users.
- 34. The analytical tools use cookies to track behavior on our sites. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this Fastshowerdoors.com website.

- 35. To read more about the technologies used by our partners, please refer to their privacy policy listed in the above-mentioned platforms or listed below:
  - Microsoft Advertising and Clarity Their privacy policy can be found at https://privacy.microsoft.com/en-US/privacystatement
  - Unbxd Their privacy policy can be found at https://unbxd.com/privacypolicy/

# O. Use of Marketing Services

- 36. Fastshowerdoors.com uses inbound marketing service for remarketing/retargeting based advertising and to help improve their our ability to deliver appropriate and relevant content and advertising to our customers. It is in our legitimate interests to be responsive to you and to ensure and improve the consumer experience with interacting with Fastshowerdoors.com.
- 37. Where we use any of your information that includes personal data in order to provide the Services of serving to you advertisements that may interest you. Including advertising and marketing to you, which includes sending promotional communications, targeting advertising, and presenting you relevant offers based on information you provide or our prior dealings.
- 38. Re-marketing involves placing a cookie on your computer when you browse our Website in order to be able to serve you an advertisement for our products or services when you visit some other website. We may use a third party to provide us with re-marketing services from time to time.

# P. Payments

- 39. We may provide paid products and/or services within the Service. In that case, we use third-party services for payment processing (e.g. payment processors).
- 40. We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.
- 41. The payment processors we work with are:
  - Google Pay Their Privacy Policy can be viewed at: https://support.google.com/googlepay/answer/9039712?hl=en

# Q. IT Security

We take various technical and organizational security measures to protect the integrity and confidentiality of your personal data. For this purpose, your personal data is encrypted during transmission using Secure Socket Layer technology (SSL). This means that the communication between your computer and the servers of the Fastshowerdoors.com websites takes place using a recognized encryption method, which is considered secure in the current version. If your browser supports SSL, this function protects the transmission of personal data. In this case, most browsers display a short dialog box or a graphic icon to indicate whether the security protocol is supported. You can find further information in the help function of your browser.

# R. Children's Privacy

Our website is not intended for children under 13 years of age. However, if a parent or guardian of a child who is under 13 years of age discovers that the personal data of such child has been submitted to Fastshowerdoors.com through the website without the parent's or guardian's consent, Fastshowerdoors.com will use commercially reasonable efforts to remove such information from the website and Fastshowerdoors.com's servers at the parent's or guardian's request. To request the removal of such personal data, the parent or guardian must contact Fastshowerdoors.com as set forth in Section 21, and provide all information requested by Fastshowerdoors.com to assist it in identifying the personal data to be removed.

# S. Changes to Privacy Policy

We reserve the right to change this Privacy Policy from time to time at our sole discretion. We will post changes on this page and indicate the "last modified" date at the top of this page. Please check back often for any updates. Your continued use of our website or Services after any change in this Privacy Policy will constitute your acceptance of such change.

### T. Contact Us

For additional inquiries about this Privacy Policy, please send us an email at privacy@fastshowerdoors.com, or contact us at 429 Worcester St, Framingham, Massachusetts 01701.