



## Unilock Privacy Policy

Last revised: February 15th, 2022

Unilock® respects your privacy and is committed to protecting it by compliance with this Privacy Policy. This Privacy Policy describes the type of personal information Unilock may collect and the purposes for which we collect it; how we collect, use, disclose, protect and otherwise manage that information; the choices you can make with respect to your personal information, including how you can withdraw your consent and access, update and/or correct your personal information; and how you can contact us about our privacy practices.

We encourage you to read this Privacy Policy in full, however, if you want to access a particular section, then you may click on the relevant link below to go directly to that section:

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### Scope

This Privacy Policy applies to the personal information we collect about you in the course of our business when you:

- visit or interact with our website [www.unilock.com](http://www.unilock.com) (“**Website**”);
- visit one of our Outdoor Idea Centers or other locations;
- participate in one of our surveys, promotions, contests, seminars, programs or other events;
- apply for employment; and/or
- communicate with us in person or by telephone, email, social media or other direct means.

This Privacy Policy does not apply to personal information about our employees in the employment context or to third party websites accessible through our Website.

For the purposes of this Privacy Policy, “**Unilock**”, “**we**” or “**us**” means Unilock Chicago, Inc., Unilock Michigan, Inc., Unilock New York, Inc., Unilock Ohio, Inc., Unilock Ltd., Hengestone Holdings, Inc. and our respective affiliates.

Please note that Unilock authorized contractors are independent third parties. This Privacy Policy does not apply to these independent authorized contractors as they are responsible under applicable laws for adopting their own privacy policies describing their privacy practices with respect to any personal information that you may provide to them or that they may collect from you.

### **Collection of Personal Information**

Personal information is information about an identifiable individual. Depending on the nature of your interaction with us, the type of personal information we may collect includes:

*Online account:* If you create an online account on our Website, we may request and collect personal information such as your name, company name, email address, address, telephone number, username and password. We will not share your personal data with an external party except in the circumstances described in this Privacy Policy.

*Promotions and Events:* If you register for or participate in one of our promotions, contests, seminars, programs or other events, we may collect personal information such as your name, address, telephone number, e-mail address and any other information that is required to administer your participation or that you may provide.

*Lifetime Guarantee & Product Rebates:* If you register for or make a claim under our Lifetime Guarantee, or apply for a Unilock product rebate, we may collect personal information such as your name, address, telephone number, e-mail address, and information about your purchase and proof of purchase.

*Reviews and Testimonials:* If you choose to provide a customer review or testimonial for our Website or our marketing materials, we will collect and may post or use, with your express consent, such reviews and testimonials on our Website or in our marketing materials.

*Surveys:* If you choose to participate in one of our surveys, whether digitally or in person, we may collect certain information that may include personal information. We may also collect demographic information such as your marital status, age, gender, age of home, income, etc.

*Communications and Requests:* If you sign up or subscribe to our email list or other promotional communications, or request a catalog or information about our products, services, warranty, promotions, seminars, programs, events, dealers or authorized contractors (for example, if you request a referral to a Unilock authorized contractor), we may collect personal information such as your name, email address, address, telephone number and any other information required in order to send such communications to you or respond to your request.

*Customer Service:* If you contact us for customer support or with a comment, question or complaint, whether in person or by telephone, email, through our Website or in any other direct manner, we may collect personal information such as your name, address, telephone number, email address and any additional information you provide to us to help us respond to your request, comment, question or complaint.

*Employment:* If you apply for an employment opportunity with Unilock, we collect personal information about you that you provide, such as your name, address, email address and phone number, as well as personal information you include in your resume, cover letter and any related application materials.

For the most part, Unilock collects personal information about you when you provide it directly to us as described above. We may also, however, collect personal information in other ways that we describe to you at the point of collection.

### **Use of Cookies and Other Tracking Technologies**

In some cases, we automatically collect certain information and technical data when you interact with our Website, emails, social media accounts and/or online advertising. For instance, we may collect your IP (Internet Protocol) address which will be anonymous and other related information such as the type of browser, operating system and device you are using. We may also track the pages you visit, the content you download, and look at what website you came from. We may collect geolocation data obtained from your IP address. We may use this information to provide you with a Website experience better tailored to your location and/or preferences, to help us understand Website activity, and to administer, monitor and improve our Website and email delivery.

The technologies and services we use may include:

*Cookies:* Our Website uses cookies, which are small text files that are sent to your browser and may be stored on the hard drive of your computer to permit the Website to recognize future visits using that browser. The information provided through cookies may be used to recognize you as a previous user of the Website, to offer personalized page content and information for your use, to track your activity at the Website, and to otherwise facilitate your Website experience. You may set your browser to notify you when you receive a cookie or to block certain cookies, however, doing so may affect your ability to access certain parts of our Website or use certain features or functionality.

*Web Beacons or Pixel Tags:* Pages of our Website and our e-mails may contain small electronic files known as web beacons or pixel tags that permit us, for example, to count users who have visited those pages or opened an email and for other related Website statistics (for example, recording the popularity of certain Website content and verifying system and server integrity).

*Google Analytics:* We use Google Analytics, a web analysis service of Google Inc. Google Analytics uses cookies to analyze your use of our Website, to create reports about visitor activities for us and to provide further services associated with the use of our Website. You may opt out of our use of Google Analytics by visiting the Google Analytics opt-out page at <https://tools.google.com/dlpage/gaoptout>. To learn more about Google Analytics and how it collects and processes data, visit <https://policies.google.com/technologies/partner-sites>.

*Interest-Based Advertising:* We sometimes work with online advertising vendors to provide you with relevant and useful ads. This may include ads served on our Website and on other third party websites. These ads may be based on information about your online activity collected by us or third parties on our Website or other third party websites. We or those third parties may use technologies such as cookies, web beacons or tracer tags to report certain information about your visits to our Website and other websites, such as web pages you visit and your response to ads, in order to measure the effectiveness of our marketing campaigns, better understand our users and to deliver ads that are more relevant to you, both on and off our

Website. To learn more about interest-based ads and to opt-out of having your information used by participating companies for interest-based advertising purposes, visit <http://www.networkadvertising.org/choices/> or <https://youradchoices.ca/en/tools>. If you opt-out of receiving interest-based ads, you will continue to receive advertising, but it will not be based on online behavioural information about you. We may also use services provided by third party platforms, including social media platforms, to serve you tailored ads. We may do this using web tracking tools or by providing a hashed version of your email address or other information to the platform provider. You may be able to opt out of their interest-based advertising by changing your advertising preferences in the platforms after you log in. For more information, you can contact us as set out below under the heading "Contact Us".

*Social Media:* We may offer you the opportunity to engage with our content on or through third-party social networking websites, plug-ins and applications. When you engage with our content on or through third-party social networking websites, plug-ins and applications, you may allow us to have access to certain information associated with your social media account (for example, name, username, email address, profile picture, gender) as determined by the settings of the social media services to deliver the content or as part of the operation of the website, plug-in or application. Please note that your interactions on a social media platform are governed by the privacy policies of that platform. When you provide information from your social media account, we may use this information to personalize your experience on the Website and on the third-party social networking websites, plug-ins and applications, and to provide you with other information, products or services you may request.

### **Use of Personal Information**

Unilock uses the personal information we collect about you for our business purposes, including:

- to create and manage your online account;
- to administer and communicate with you about your participation in surveys, promotions, contests, seminars, programs or other events;
- to register you for, and administer, our Lifetime Guarantee in accordance with our warranty terms and conditions;
- to process a product rebate to which you are entitled;
- with your express consent, to post or use your comments, reviews or testimonials on our Website and/or in our other marketing materials;
- to respond to your questions, requests, comments or complaints;
- to provide, manage and improve our Website, product and service offerings, and marketing;
- to customize your experience on our Website;
- if you subscribe to our e-mail list or indicate that you wish to receive promotional or marketing communications, to communicate with you about product and service offerings, promotions, programs or events that may be of interest to you. You may opt-out or unsubscribe from receiving promotional or marketing emails at any time by following the unsubscribe instructions included in the email or by contacting us directly as described below (see "Contact Us");
- to notify you about changes to this Privacy Policy, our Website terms of use, or any of our events or programs in which you may be registered;
- to review, process and contact you with respect to your applications for employment;
- to detect, prevent, or investigate security breaches, error or fraud;
- to fulfill our legal obligations and enforce our rights and agreements with you;

- to fulfill any other purpose for which you provided the information or that was identified to you when it was collected; and
- for such other purposes with your consent, or as permitted or required by applicable law.

In some circumstances we may anonymize or de-identify your personal information so that it can no longer be associated with you and aggregate this de-identified information with de-identified information of other persons. We may use and disclose such anonymous and de-identified data for any legitimate business purpose, including marketing, customer service and business analytics.

### **Sharing or Disclosure of Personal Information**

We may share or disclose your personal information in the following circumstances:

- We may share your personal information with third-party service providers that we use to support our business operations (such as those that assist us with website hosting and optimization, location mapping, sending email and other communications, conducting surveys and data analytics), in which case we require such service providers not to use or disclose your personal information for any purpose other than for the purposes for which we share it with them, except as permitted or required by applicable law, and to protect it in a manner that is consistent with the standards we use and applicable law.
- If you request a referral to a Unilock authorized contractor, we may disclose your name, email, telephone number, address, and general information about the scope and type of your project, to one or more of our authorized contractors in order that they can contact you with respect to your request.

We may disclose business contact information of Unilock authorized contractors with our business partners who are running a joint promotion or program with us (for instance, with respect to financing options, discount programs or accessories they sell) for the purpose of sending email communications related to such programs [if such contractors have consented to such disclosure]. In such instances, we require that such business partners use such business contact information solely for such purpose and in accordance with applicable law. Recipients may opt-out or unsubscribe from receiving any such promotional emails by following the unsubscribe instructions included in the email, or by contacting us directly as described below (see “Contact Us”).

- We may disclose your personal information to a prospective or actual buyer or other successor, in preparation for and/or upon completion of a merger, amalgamation, sale or other disposition of all or part of our business or assets, whether as a going concern or as part of a bankruptcy, liquidation or similar proceeding, in which the personal information held by Unilock is among the assets transferred. In these types of transactions, your information (including personal information) may be shared, sold or transferred, and it may be used subsequently by a third party.
- We may also disclose your personal information:
  - to comply with any court order, law, or legal process, including to respond to any government or regulatory request, in accordance with applicable law;
  - to enforce our rights and agreements, including our Website terms of use;
  - if we believe disclosure is necessary or appropriate to protect the rights, property or safety of Unilock, you or others;

- for any other purpose for which you provided the information or that was identified by us when it was collected; and
- for such other purposes with your consent, or as permitted or required by applicable law.

### **Storage and Processing of Personal Information**

Your personal information is stored, processed and/or otherwise used by or on behalf of Unilock in Canada and the United States, and in some cases may be processed and/or stored in other countries. Where your personal information is transferred to, processed and/or stored in a country other than your own, it may be subject to the laws of that country and may be subject to disclosure to the governments, courts and/or law enforcement or regulatory agencies of such other country in accordance with the laws of such country. Regardless of where your personal information is processed or stored, we will take reasonable steps to protect your personal information in accordance with this Privacy Policy and applicable privacy laws. For further information, please contact us as set out below (see “Contact Us”).

### **Consent and Withdrawing Consent**

By using our Website or providing us with your personal information, you consent our collection, use and disclosure your personal information in accordance with this Privacy Policy. You may withdraw your consent to our collection, use and disclosure of your personal information, subject to any legal and contractual restrictions and reasonable notice. If you withdraw your consent, we may not be able to provide you with the information, product or service you request. We will explain the implications to you at the time to help you with your decision. To withdraw your consent, please contact us as described below (see “Contact Us”). You may opt-out of receiving marketing or promotional emails from us at any time by following the unsubscribe instructions included in such emails or by contacting us as described below (see “Contact Us”). Even if you opt-out of receiving marketing or promotional emails, we may still send you non-promotional communications such as emails responding to or following up on an inquiry or other request, or in connection with warranty or rebate information, your online account, or programs or events in which you are registered.

### **Security**

The security of your personal information is important to us. We use reasonable security safeguards appropriate to the sensitivity of the information we collect, including physical, organizational and technological measures, to protect your personal information against loss or theft, and unauthorized access, disclosure, copying, use or alteration.

In some cases, we also rely on you to assist us to safeguard your personal information. For instance, where you have created an account on our Website, or we have given you or you have chosen a password to access a password protected area of our Website, you are responsible for keeping your password confidential. We strongly recommend that you not share your password with others and promptly alert us if you believe your password has been compromised.

The Internet is not 100% secure and we cannot guarantee that our safeguards will always be effective or that your use of our Website will be completely secure. A breach of security safeguards can result in such risks as phishing and identity theft. In such cases, we will act

promptly to mitigate the risks and to inform you where there is a real risk of significant harm, or as otherwise required by applicable law.

### **Retention of Personal Information**

We retain your personal information as long as reasonably necessary for the fulfilment of the purposes for which it was collected as set out in this Privacy Policy, or as otherwise required or permitted by applicable law. The length of time we retain personal information may vary depending on the nature of the information and the purpose for which it was collected.

### **Accessing, Updating or Correcting Personal Information**

To the extent required or permitted by applicable law, we will, upon request, inform you of the existence, use and disclosure of your personal information in our custody or control and provide you with access to that information. You may also request that we update or correct any inaccurate, outdated or incomplete personal information in our custody or control. We may require specific information from you to help us confirm your identity and respond to your request. Applicable law may allow or require us to refuse to provide you with access to some or all of your personal information, or we may have destroyed, erased, or made your personal information anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

To request access to, or to update or correct your personal information in our records, please contact us in writing as described below (see “Contact Us”) or, if you have created an account on our Website, you can access and update your online profile information at any time by logging into the Website and visiting your account profile page.

### **California Privacy Notice**

Pursuant to applicable California law, including the California Consumer Privacy Act (“CCPA”), Unilock makes the following disclosures regarding the personal information it has collected within the last 12 months:

<b><u>Category of Personal Information</u></b>	<b><u>Category of Source from which Data is Collected</u></b>	<b><u>Purpose of Collection</u></b>	<b><u>Category of Third Parties to whom Data is Disclosed</u></b>
Identifying information and contact information, such as name, company name, e-mail address, phone number, mailing address	Directly from users	To provide and support our Website, products and services; to administer online user accounts; to maintain our electronic and digital programs; to market to users; to provide customer service and communicate with users	Service Providers
Product purchase information, such as name, contact	Directly from users	To administer our Lifetime Guarantee and related warranty programs; to process rebates	Service Providers

information, and proof of purchase information			
Demographic information, such as marital status, age, gender, age of home, income	Directly from users	To administer surveys, promotions, and other programs and events; to maintain our electronic and digital programs; to market to users; to personalize user experience with us	Service Providers
Automatically collected information on websites such as IP address, device type, browser type	Cookies and other tracking technologies	To conduct data analytics and support our Website; to monitor, analyze and improve our services and our Website's performance and functionality	Service Providers

We have not sold consumers' personal information in the 12 months preceding the "last revised" date at the top of this Privacy Policy.

If you are a California resident, pursuant to the CCPA, you have the right to request:

- the categories of personal information we have collected about you;
- the categories of sources from which your personal information is collected;
- the business or commercial purpose of collecting or selling your personal information;
- the categories of third parties with whom we shares your personal information;
- the specific pieces of personal information we have collected about you;
- when and if applicable, the categories of personal information that we have sold about you and the categories of third parties to whom the personal information was sold, if applicable;
- deletion of your personal information; and
- an opt-out of having your personal information disclosed or sold to third parties.

To submit a request, or designate an authorized agent to make a request under the CCPA on your behalf, please contact us at [ccpa@unilock.com](mailto:ccpa@unilock.com) or 1-800-UNILOCK or complete the web form located at [unilock.com](http://unilock.com) To verify your identity when you submit a request, we will match the identifying information you provide us to the personal information we have about you. If you have an account with us, we may also verify your identity through our existing authentication practices for your account. Requests will typically be honored within 45 days or less, but may take up to 90 days based on the results of verification.

We will not be required to comply with your request to delete your personal information if it is necessary for us to maintain your personal information in order to:

- complete the transaction for which the personal information was collected, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us;



- detect security incidents, protect against malicious, deceptive, fraudulent or illegal activity, or prosecute those responsible for that activity;
- debug to identify and repair errors that impair existing intended functionality;
- exercise free speech, ensure the right of another consumer to exercise his or her right of free speech or exercise another right provided for by law;
- comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code;
- engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, if you have provided informed consent;
- to enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us;
- comply with a legal obligation; or otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

We will not discriminate against you in the event you exercise any of the aforementioned rights under CCPA, including, but not limited to, by:

- denying goods or services to you;
- charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
- providing a different level or quality of goods or services to you; or
- suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

### **Your Nevada Privacy Rights**

We do not currently sell your covered information as those terms are defined under applicable Nevada law. However, you may still submit an opt-out request and we will honor that request as required by Nevada law if we were to ever engage in such a sale in the future. If you are a Nevada resident and would like to opt-out of future sales of your covered information, please contact us as set out below (see "Contact Us"). Your request must include your full name, street address, city, state, zip code, and an e-mail address so that we can contact you if needed regarding this request. You may also be required to take reasonable steps as we determine from time to time in order to verify your identity and/or the authenticity of the request. We will respond to your request within 60 days either confirming that your request has been processed or indicating that we need an additional 30 days to complete the request.

## **Children's Privacy**

Our Website is not directed to or intended to be used by individuals under the age of 16. We do not knowingly request or collect personal information from any person under 16 years of age without prior verifiable parental consent. If you believe that your child under the age of 16 has submitted personal information to us in connection with our Website, and without prior verifiable parental consent, please contact us as set out below (see "Contact Us") so that we can take steps to delete the personal information as required in accordance with applicable law.

## **Links**

Our Website contains links to third-party websites. If you click on one of those links, you will leave our Website and be taken to websites that Unilock does not control. This Privacy Policy does not apply to third-party websites or their privacy practices. We encourage you to read the privacy policies of other websites that you visit. We are not responsible for the privacy policies or practices of third-party websites.

## **Changes to this Privacy Policy**

From time to time Unilock may make changes to this Privacy Policy. Any revised Privacy Policy will be posted on our Website and we will update the "last revised" date at the top of this Privacy Policy. We may also notify you of any material changes to this Privacy Policy through a notice on our Website, by email and/or by any other legal means. We encourage you to review our Privacy Policy periodically to check for any changes and whenever you use our Website.

## **Contact Us**

If you have any questions, comments or concerns related to this Privacy Policy or our privacy practices, or to request access to or to update or correct your personal information, please contact Unilock at:

Privacy Officer

Mail: The West Mall, Suite 610, Toronto, Ontario M9C 5J5

Tel: 1-416-646-5180

Email: [privacy@unilock.com](mailto:privacy@unilock.com)

We have procedures in place to receive and respond to inquiries or complaints regarding our handling of personal information and our compliance with this Privacy Policy and applicable privacy laws.