

## Vista Products Privacy Policy

*Last Revised: December, 2019*

This Privacy Policy describes how Vista Products, Inc. and our affiliates (collectively, "Company," "we," "us," or "our") collects, uses, shares, and safeguards personal information. This Privacy Policy also tells you about your rights and choices with respect to your personal information, and how you can reach us to get answers to your questions. You can jump to particular topics by going to the headings below:

- Types Of Information We Collect**
- Use And Processing Of Information**
- Cookies**
- Sharing Of Information**
- Your Choices**
- How We Protect Personal Information**
- Miscellaneous**
- Contact Information and Submitting Requests**

### Types of Information We Collect

The following provides examples of the type of information that we collect from you and how we use that information.

Context	Types of Data	Primary Purpose for Collection and Use of Data
Customer Information	We collect the name, and contact information, of our customers and their employees with whom we may interact.	We have a legitimate interest in contacting our customers and communicating with them concerning normal business administration such as projects, services, and billing, and to provide additional information regarding products.
Cookies and first party tracking	We use cookies and clear GIFs. "Cookies" are small pieces of information that a website sends to a computer's hard drive while a web site is viewed. See our <a href="#">Cookie Section below</a> for more information.	We have a legitimate interest in making our website operate efficiently.
Cookies and Third Party Tracking	We may participate in behavior-based advertising, this means that a third party uses technology ( <i>e.g.</i> , a cookie) to collect information about your use of our website so that they can provide advertising about products and services tailored to your interests on our website, or on other websites. See our <a href="#">Cookie Section below</a> for more information.	We have a legitimate interest in engaging in behavior-based advertising and capturing website analytics.

Email Interconnectivity	If you receive email from us, we use certain tools to capture data related to when you open our message, click on any links or banners it contains and make purchases.	We have a legitimate interest in understanding how you interact with our communications to you.
Employment	If you apply for a job posting, seeking additional information about employment opportunities, or become an employee, we collect information necessary to process your application or to retain you as an employee. This may include, among other things, your Social Security Number. Providing this information is required for employment.	We use information about current employees to perform our obligations as an employer. In some contexts, we are also required by law to collect information about our employees. We also have a legitimate interest in using your information to have efficient staffing and work force operations.
Feedback/Support	If you provide us feedback or contact us for support we will collect your name and e-mail address, as well as any other content that you send to us, in order to reply.	We have a legitimate interest in receiving, and acting upon, your feedback or issues.
Mailing List	When you sign up for one of our mailing lists we collect your email address or postal address.	We share information about our products and services with individuals that consent to receive such information. We also have a legitimate interest in sharing information about our products or services.  Additionally, we may hire a third party to send mail to you based of information that third party has about you, such as your address and demographic data. The third party's privacy practices apply in this scenario.
Mobile Devices	We collect information from your mobile device such as unique identifying information broadcast from your device when visiting our website	We have a legitimate interest in identifying unique visitors, and in understanding how users interact with us on their mobile devices.
Order Placement	We may collect your name, billing address, shipping address, e-mail address, phone number, and credit card number when you place an order.	We use your information to perform our contract to provide you with products or services.
Partner Promotion	We collect information that you provide as part of a co-branded	We have a legitimate interest in fulfilling our promotions.

	promotion with another company.	
Surveys	When you participate in a survey we collect information that you provide through the survey. If the survey is provided by a third party service provider, in some instances, the third party's privacy policy applies to the collection, use, and disclosure of your information.	We have a legitimate interest in understanding your opinions, and collecting information relevant to our organization.
Request a Consultation or Appointment	When you request a consultation or an appointment with one of our representatives we collect information from you necessary to provide the consultation, such as your address or contact information.	We collect this information based off of your consent to receive a consultation.
Sweepstakes or contests	When you participate in a sweepstakes or contest we collect information about you which includes contact information to notify you if you are selected.	We have a legitimate interest in operating the sweepstakes. In some contexts we are also required by law to collect information about those that enter into our sweepstakes, and we have a legitimate interest in complying with those laws.
Website interactions	We use technology to monitor how you interact with our website. This may include which links you click on, or information that you type into our online forms. This may also include information about your device or browser.	We have a legitimate interest in understanding how you interact with our website to better improve it, and to understand your preferences and interests in order to select offerings that you might find most useful. We also have a legitimate interest in detecting and preventing fraud.
Web logs	We collect information, including your browser type, operating system, Internet Protocol (IP) address (a number that is automatically assigned to a computer when the Internet is used), domain name, click-activity, referring website, and/or a date/time stamp for visitors.	We have a legitimate interest in monitoring our networks and the visitors to our websites. Among other things, it helps us understand which of our web services or features is the most popular.

In addition to the information that we collect from you directly, we may also receive information about you from other sources, including third parties, business partners, our affiliates, or publicly available sources. For example, if you submit a job application, or become an employee, we may conduct a background check.

**Use And Processing Of Information.**

In addition to the purposes and uses described above, we use information in the following ways:

- To identify you when you visit our websites or our stores.
- To provide products and services, including replacement parts, or to process returns.
- To improve our services and product offerings.
- To register your warranty.
- To conduct analytics.
- To set up consultation appointments.
- To respond to inquiries related to support, employment opportunities, or other requests.
- To send marketing and promotional materials, including information relating to our products, services, sales, or promotions.
- For internal administrative purposes, as well as to manage our relationships.

Although the sections above describe our primary purpose in collecting your information, in many situations we have more than one purpose. For example, if you complete an online purchase we may collect your information to perform our contract with you, but we also collect your information as we have a legitimate interest in maintaining your information after your transaction is complete so that we can quickly and easily respond to any questions about your order. As a result, our collection and processing of your information is based in different contexts upon your consent, our need to perform a contract, our obligations under law, and/or our legitimate interest in conducting our business.

### **Cookies**

**What are cookies?** A cookie is a small file placed onto your device that enables a variety of features and functionality. Cookies also enable you to easily share content and help us serve relevant ads to you. Cookies can do this because websites can read and write them, enabling websites to recognize you and remember important information that will make your use of a website more convenient (for example by remembering preference settings). We use cookies and other similar technologies to ensure everyone who uses our website has the best possible experience and for marketing purposes.

**How are cookies used for advertising purposes?** Cookies and other ad technology such as beacons, pixels, and tags help us serve relevant ads to you more effectively. They also help us provide aggregated auditing, research, and reporting for advertisers, understand and improve our service, and know when content has been shown to you. We may use third party advertising companies to serve ads when you visit our website. These companies may employ cookies and clear GIFs to measure advertising effectiveness. We encourage you to read the privacy policies of these third party advertising companies if you have any concerns. Note: Because your web browser may request advertisements and beacons directly from third party ad network servers, these networks can view, edit, or set third party cookies, just as if you had requested a web page from their site. Ads served by us may also set third party cookies.

Unless you clear these cookies from your browser, we may use this information to:

- provide more relevant, interest-based advertising
- provide aggregate reports of ads activity to advertisers and websites hosting the ads
- help website and app owners understand how visitors engage with their sites or apps
- detect and defend against fraud and other risks to protect users and partners
- improve our products

**Controlling cookies.** Most browsers allow you to control and erase cookies through their settings preferences. However, if you limit the ability of websites to set cookies, you may worsen your overall user experience, since it will no longer be personalized to you. Additionally, some features may work improperly or not at all. It may also stop you from saving customized settings.

## **Sharing Of Information.**

In addition to the specific situations discussed elsewhere in this policy, we disclose information in the following situations:

1. **Affiliates and Acquisitions.** We may share information with our corporate affiliates (*e.g.*, parent company, sister companies, subsidiaries, joint ventures, or other companies under common control). If another company acquires, or plans to acquire, our company, business, or our assets, we may also share information with that company, including at the negotiation stage.
2. **Other Disclosures with Your Consent.** We may ask if you would like us to share your information with other unaffiliated third parties who are not described elsewhere in this policy.
3. **Other Disclosures without Your Consent.** We may disclose your information to third parties where we have a legitimate interest in providing you our products or services. This includes sharing your information with third party installation service providers of our products as well as our third party marketing partners. In addition, we may disclose information in response to subpoenas, warrants, or court orders, or in connection with any legal process, or to comply with relevant laws. We may also share your information in order to establish or exercise our rights, to defend against a legal claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies, or to comply with your request for the shipment of products to or the provision of services by a third party intermediary.
4. **Partner Promotion.** We may offer contests, sweepstakes, or other promotions with third party partners. If you decide to enter a contest, sweepstakes, or promotion that is sponsored by a third party partner the information that you provide will be shared with us and with them. Their use of your information is not governed by this privacy policy.
5. **Service Providers.** We may share your information with service providers. Among other things service providers may help us to administer our website, conduct surveys, provide technical support, process payments, and assist in the fulfillment of orders.

## **Your Choices**

You can make the following choices regarding your personal information:

1. **Access to Your Personal Information.** You may request access to your personal information by contacting us as discussed in this policy. If required by law, upon request, we will grant you reasonable access to the personal information that we have about you. Note that California residents may be entitled to ask us for a notice describing what categories of personal information (if any) we share with third parties or affiliates for direct marketing.
2. **Deletion of Your Personal Information.** Typically, we retain your personal information for the period necessary to fulfill the purposes outlined in this policy, unless a longer retention period is required or permitted by law. You may, however, request information about how long we keep a specific type of information, or request that we delete your personal information by contacting us as discussed in this policy. If required by law we will grant a request to delete information, but you should note that in many

situations we must keep your personal information to comply with our legal obligations, resolve disputes, enforce our agreements, or for another one of our business purposes.

3. **Objection to Certain Processing.** You may object to our use or disclosure of your personal information by contacting us at the address described below.
4. **Online Tracking.** We do not currently recognize automated browser signals regarding tracking mechanisms, which may include "Do Not Track" instructions.
5. **Promotional Emails.** You may choose to provide us with your email address for the purpose of allowing us to send free newsletters, surveys, offers, and other promotional materials to you, as well as targeted offers from third parties. You can stop receiving promotional emails by following the unsubscribe instructions in e-mails that you receive. If you decide not to receive promotional emails, we may still send you service related communications.
6. **Promotional Mailings.** If at any time you do not want to receive offers and/or circulars from us you can remove yourself from our mailing lists by emailing us (our contact information is below) with "NO SNAIL MAIL" in the subject line along with your name, address and zip code and we will remove you if required by law. Please note that our mailings are prepared in advance of their being sent. Although we will remove your name from our mailing list after receiving your request, you may still receive mailings from us that had been initiated prior to your name being removed. You may also still receive mailers from third parties containing information about the Company if the Company hired that party to send mailers to certain groups or markets. In those scenarios, the third party's privacy policy applies.
7. **Revocation of Consent.** If you revoke your consent for the processing of personal information, then we may no longer be able to provide you services. In some cases, we may limit or deny your request to revoke consent if the law permits or requires us to do so, or if we are unable to adequately verify your identity. You may revoke consent to processing (where such processing is based upon consent) by contacting us at the address described below.

### **How We Protect Personal Information**

No method of transmission over the Internet, or method of electronic storage, is fully secure. While we use reasonable efforts to protect your personal information from unauthorized access, use, or disclosure, we cannot guarantee the security of your personal information. In the event that we are required by law to inform you of a breach to your personal information we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

### **Miscellaneous**

The following additional information relates to our privacy practices:

- **Transmission of Information to Other Countries.** Your information may be processed in a foreign country where privacy laws may be less stringent than the laws in your country. By submitting your personal information to us you agree to the transfer, storage and processing of your information in a country other than your country of residence including, but not necessarily limited to, the United States.
- **Third Party Applications/Websites.** We have no control over the privacy practices of websites or applications that we do not own.
- **Changes to This Privacy Policy.** We may change our privacy policy and practices over time. To the extent that our policy changes in a material way, the policy that was in place at the time

that you submitted personal information to us will generally govern that information unless we receive your consent to the new privacy policy. We will note the effective date of the latest version at the beginning of the Privacy Policy.

- **Information for California Residents.** California Civil Code Sections 1798.115(c), 1798.130(a)(5)(c), 1798.130(c), and 1798.140 indicate that organizations should disclose whether certain categories of information are collected, "sold" or transferred for an organization's "business purpose" (as those terms are defined under California law). You can find a list of the categories of information that we collect and share [here](#). Please note that because this list is comprehensive it may refer to types of information that we share about people other than yourself. If you would like more information concerning the categories of personal information (if any) we share with third parties or affiliates for those parties to use for direct marketing, please submit a written request to us using the information in the "Contact Information" section below. We do not discriminate against California residents who exercise any of their rights described in this Privacy Policy.

**Contact Information and Submitting Requests.** If you have any questions, comments, or complaints concerning our privacy practices please contact us at the appropriate address below. We will attempt to respond to your requests and to provide you with additional privacy-related information.

Vista Products, Inc.  
Attention: Privacy Policy Manager  
1 Blue Hill Plaza  
P.O. Box 1569  
Pearl River, NY 10965

If you would like to request access or deletion of your data, please use our Request Portal by clicking on the link below or you may call us at:

Link to Request Portal: [Click Here](#)

Toll Free Phone #: **866-930-0488**

**Effective Date: December, 2019**

\*\*\*\*\*Separate page to be linked from the Information for California Residents Section\*\*\*\*\*

### California Information Sharing Disclosure

California Civil Code Sections 1798.115(c), 1798.130(a)(5)(c), 1798.130(c), and 1798.140 indicate that organizations should disclose whether the following categories of personal information are collected, transferred for “valuable consideration,” or transferred for an organization’s “business purpose” (as those terms are defined under California law). The table below indicates the categories of personal information we collect and transfer in a variety of contexts. Please note that because this list is comprehensive, it may refer to types of information that we collect and share about people other than yourself. For example, while we transfer credit card or debit card numbers for our business purpose in order to process payments for orders placed with us, we do not collect or transfer credit card or debit card numbers of individuals that submit questions through our website’s “contact us” page.

Category of Personal Information	Is information collected by us?	Is information transferred for valuable consideration?	Is information transferred for business purposes?
Audio, electronic, visual, thermal, olfactory, or similar information	✓	<input type="checkbox"/>	✓
Bank account number	✓	<input type="checkbox"/>	✓
Biometric information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Characteristics of protected classifications (e.g., age, sex, race, ethnicity, physical or mental handicap, etc.)	✓	<input type="checkbox"/>	✓
Commercial information (e.g., products or services purchased, or other purchasing or consuming histories or tendencies)	✓	<input type="checkbox"/>	✓
Credit card number	✓	<input type="checkbox"/>	✓
Debit card number	✓	<input type="checkbox"/>	✓
Driver’s License Number / State ID	✓	<input type="checkbox"/>	✓
Education	✓	<input type="checkbox"/>	✓
Electronic network activity (e.g., browsing history)	✓	<input type="checkbox"/>	✓



Email address	✓	<input type="checkbox"/>	✓
Employment	✓	<input type="checkbox"/>	✓
Employment history	✓	<input type="checkbox"/>	✓
Geolocation data	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Health insurance information	✓	<input type="checkbox"/>	✓
Identifiers (e.g., name or alias)	✓	<input type="checkbox"/>	✓
Insurance Policy Number	✓	<input type="checkbox"/>	✓
Medical information	✓	<input type="checkbox"/>	✓
Online identifier (e.g. IP address)	✓	<input type="checkbox"/>	✓
Other financial information	✓	<input type="checkbox"/>	✓
Passport Number	✓	<input type="checkbox"/>	✓
Physical Characteristics	✓	<input type="checkbox"/>	✓
Postal address	✓	<input type="checkbox"/>	✓
Signature	✓	<input type="checkbox"/>	✓
Social Security Number	✓	<input type="checkbox"/>	✓
Telephone Number	✓	<input type="checkbox"/>	✓
Transaction information	✓	<input type="checkbox"/>	✓