

DATA PRIVACY NOTICE

Last updated October 2020

This is the Data Privacy Notice (“Privacy Notice”) of Spinnaker Coating, LLC and its affiliate and subsidiary entities (“Spinnaker” or the “Company”). We maintain a website (the “website”) to provide our products to you. The website may ask for and collect your personal information in order to provide you with our products, enhance your experience, and provide you with other relevant information about our offerings. This Privacy Notice applies to activities the Company engages in on its website and activities that are offline or unrelated to its website. We are providing this notice to explain our information practices and how your information is collected and used.

This Privacy Notice sets forth the principles that govern our treatment of personal information. We expect all of our employees and those with whom we share personal information to adhere to this Privacy Notice.

Spinnaker is committed to protecting the information that our customers, employees, suppliers, and others have entrusted to us.

This Privacy Notice applies to all personal information collected by Spinnaker, relating to all customers, employees, suppliers, and others who do business with us.

PERSONAL INFORMATION WE COLLECT AND USE

Personal Information You Provide

We only collect personal information that you provide to us, or that we are authorized to obtain by you or by law. The types of personal information we collect from you will depend on how you are interacting with us using our website and products. For example, we may collect different information from you when you request a quote, or if you register for an online account or ask us a question. Depending on how you interact with us or our website, we may have collected the following categories of personal information from you within the past 12 months:

- When you ask us questions or make requests: We may collect your name; email address; phone number; address; and feedback from you directly;
- When you visit our website: We may collect your IP address; click through information; browser type; and general location from your browser;
- When you place an order or request a quote or a sample: We may collect your name; email address; phone number; fax number; website; payment card number; expiration date; and CVV from you;
- If you ask us to send you marketing information and special offers: We may collect your name; email address; and phone number from you or from an existing Spinnaker customer;
- To operate, evaluate, and improve our business, including improving and personalizing the experience for you and others, and to notify you of changes in products, technologies, or prices that may be relevant to your business;
- Using Data Analytics to audit, research, and conduct analysis in order to maintain and improve our products and to protect people who use our website;

- For safety and security, by making sure third parties protect your information, monitoring the technical functioning and security of our network;
- For legal and compliance, including complying with applicable laws, regulations, and legal obligations; and
- To protect the rights or property of the Company, its employees, and people who use its website.

We do not sell any personal information from any individuals to third parties.

HOW WE MAY USE YOUR INFORMATION

Your privacy is important to us. We collect and use information we need to do our business, including providing you with the products and experiences you expect from us. When we collect and use your information, we take your privacy and security very seriously.

We collect personal information to provide products and information to you. We will use the information provided by you or on your behalf to provide our products, other information, or to fulfill your requests. Specifically, we have used your personal information for the following purposes within the twelve (12) months preceding the date of this Notice:

Category	Types of Information Collected	Purpose for Collection
A. Identifiers.	Real name, signature, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, or other similar identifiers.	Feedback Orders Marketing
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	Name, address, telephone number, credit card number, debit card number, or any other payment information. Some personal information included in this category may overlap with other categories.	Feedback Orders Marketing
C. Internet or other similar network activity.	Internet Protocol (IP) address, network location, time/date stamp, referring site details, browser type, referring/exit pages, operating system, and/or clickstream data.	Marketing Website Analytics Safety / Security

COOKIES AND SIMILAR TECHNOLOGIES

A “cookie” is a small text file that websites send to your computer or other Internet-connected device to identify your browser or to store information or settings in the browser. A “web beacon”, also known as an Internet tag, pixel tag or clear GIF, links web pages to web servers and their cookies and may be used to transmit information collected through cookies back to a web server.

Our website uses cookies, web beacons, java scripts, and similar technologies to automatically collect certain information about your activity relating to your visit to our website. These technologies collect your Internet Protocol (IP) address, network location, time/date stamp, referring site details, browser type, referring/exit pages, operating system, and/or clickstream data. We use this data to analyze trends, administer our website, track users' movements through our website, and gather demographic information about our customers as a whole. We may receive reports based on these technologies on an aggregated basis.

Behavioral Tracking/Third Party Cookies

We use third-party analytics services on our website, including Google Analytics. To learn more about Google Analytics, visit: <https://policies.google.com/technologies/partner-sites>.

Your Internet browser may let you restrict or disable certain types of cookies. Without cookies, you may not be able to use all of the options on our website.

Some web browsers allow you to turn on Do Not Track (“DNT”), which sends signals to websites you visit, telling those sites that you do not want your online activities to be tracked. Our website currently is not designed to respond to DNT signals received from web browsers.

We may also use JavaScript to help our website, especially pictures, function better. You can turn JavaScript on or off in your browser functions, but if you turn it off, you may not be able to use all of the options on our website.

Sometimes we use technology to collect the information that your browser uses to auto-fill. We use this to tell you if there is a mistake in registration or if the registration cannot be submitted. You can stop this technology by turning it off in your browser, and you will still be able to use all of the options on our website.

HOW WE SHARE PERSONAL INFORMATION

We may share information about you to third parties as indicated below:

Affiliates: We may share your personal information with our affiliates and subsidiaries if we need to. If we share your information, we will share only the information that is necessary and we will take reasonable steps to make sure that third parties take prudent steps to protect your information.

Service Providers, Suppliers, Agents, and Business Partners: Other companies sometimes provide certain services to us or on our behalf (e.g., maintenance, IT support, analysis, development, security). Unless we tell you differently or as described elsewhere in this Privacy Notice, our service providers are not permitted to use your information except to assist us.

Compliance with Legal Obligations: We may need to disclose certain information to auditors, government authorities, law enforcement, regulatory agencies, our legal counsel, third party litigants and their counsel, or other authorized individuals in order to comply with laws that apply to us, or other legal obligations such as contractual requirements.

Changes in Business Structure/Ownership: We may disclose or transfer your personal information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of the Company's business, assets, or ownership interest (including any bankruptcy or similar proceedings).

We have not sold, shared, or monetized any categories of personal information within the past 12 months.

Information We Disclose for a Business Purpose

In addition to the purposes described in this notice, we may use personal information listed below for business purposes:

- To provide you with products, including customer service, processing orders or transactions, verifying consumer information, and processing payments, we use the following categories of information: identifiers, personal information subject to Cal. Civ. Code § 1798.80(e), and online activity;
- To improve our website, including responding to inquiries and improving functionality, we use the following categories of information: identifiers and online activity; and
- To comply with your requests, including sending your information to third parties if you ask us to do so: identifiers, personal information subject to Cal. Civ. Code § 1798.80(e), and online activity.

HOW WE PROTECT YOUR PERSONAL INFORMATION

We strive to take appropriate security measures to help safeguard your personal information from unauthorized access and disclosure. For example, only authorized employees are allowed to access personal information, and they may only access it for permitted business functions. We also use technology to protect your information, including encryption.

While we cannot guarantee that loss, misuse, or alteration will never occur, we use reasonable efforts to prevent it. Please keep in mind that no method of storage or transmission over the Internet is completely secure, so your use of our services and provision of information to us is at your own risk.

Our website may contain links to other sites on the Internet that are owned and operated by third parties. The information practices of those websites linked to our website are not covered by this Privacy Notice. We are not responsible for the privacy policies of other websites to which our website links.

CHANGES TO THIS NOTICE

We reserve the right to modify or change this Privacy Notice at any time. When we make a material change to this Privacy Notice, we will inform you by posting a prominent notice on the home page of our website or changing the date on this page noting when the Privacy Notice was last updated.

CONTACT US

For questions regarding this Privacy Notice or to submit any of the requests mentioned above relating to your personal information, please contact us using any of the following options:

Mail

518 East Water Street, Troy, Ohio 45373

Email

sales@spinps.com

Telephone

937-332-6500