



IPS Corporation Privacy Policy

Last updated: February 27, 2024

Table of Contents

Privacy Policy and Notice	4
When does this Notice apply?	4
Who we are	4
Who do we collect personal information from?	4
What personal information does IPS Corporation collect and why?	5
Categories of Personal Information We Collect.....	5
Sources of Personal Information and Purposes for Collection	6
1. Website visitors	6
2. Customers, Suppliers, Business Partners, and Visitors	7
3. Employees, Contractors and other staff	7
4. Other visitors and people we connect with	8
Further use of personal information	8
Who do we disclose your personal information to and for what purposes?	8
Cookies and similar tracking technology	9
Children.....	9
How do we keep your personal information secure?	10
International data transfers	10
Data retention	10
Updates to this Privacy Notice	11
How to contact us.....	11
European Economic Area (EEU) and UK Supplement	11
European Economic Area and UK Privacy Rights.....	11
Access to personal data	12
Rectification.....	12
Erasure ('right to be forgotten')	12
Restriction on processing.....	13
Objection to processing.....	13
Withdrawal of consent	13
Right to data portability.....	13
Legal basis for processing personal information.....	14
International Transfers.....	15
USA States Supplement	17

Scope of Supplemental State Privacy Notice	17
Additional Privacy Rights for Residents of Certain states.....	17
Supplemental Notice for California	20
Supplemental Notice for Nevada	20
Canada Supplement	21

Privacy Policy and Notice

When does this Notice apply?

IPS Corporation and its subsidiaries respect your right to privacy. This Privacy Policy and Notice (the “**Privacy Policy**”) is applicable to the IPS Corporation (hereinafter referred to as “**IPS Corporation**” or “**us**” or “**we**”) website and its operating company websites located at www.ipscorp.com (the “**Website**”) and any mobile applications of the Website or other tools (the “**Services**”) used in the collection and management of data, whether in digital or hardcopy form. This Notice explains who we are, how we collect, disclose, retain and use personal information about you, and how you can exercise your privacy rights. This Privacy Policy applies in general to all instances where we collect and process personal information. In particular this Privacy Policy applies to personal information that we collect through our Website, Services, or other tools that relates to our customers, suppliers, and other individuals through any other form of interaction whether online or offline.

Your use of the Website and Services and any personal information you provide as part of any data collection remains subject to the terms of this Privacy Policy and our [Terms & Conditions](#). If you do not agree with any term in this Privacy Policy or our Terms & Conditions, do not use our Website or Services or otherwise provide us your personal information. Disputes related to your use of our websites or Services are, to the extent applicable, subject to this Privacy Policy and our Terms & Conditions, including limitations on damages, resolution of disputes, and application of the laws of the United States.

Who we are

IPS Corporation is the most trusted manufacturer of rough plumbing and roofing supplies for the construction industry, as well as structural adhesives and solvent cements for a broad range of construction, industrial, and manufacturing applications. Our leading brands include AB&A®, Arjay™, Christy’s™, Floodstop™, Guy Gray®, Integra®, Moo Gloo®, Roof Top Blox™, SciGrip®, Studor®, Test-Tite®, Tough Pans™, TruBro®, Water-Tite®, and Weld-On®.

Headquartered in California, IPS Corporation has operations throughout the United States, Europe, and Asia. Our industry leading products are manufactured using state-of-the-art processes and are distributed throughout the world with the support of our wholesale and retail customers. For more information about IPS and its operating companies, please see the “[About Us](#)” section of our Website at <https://www.ipscorp.com/>

If you have any requests about this privacy notice, including any request to exercise your legal rights, please contact us at privacy@ipscorp.com, via Toll free phone call at (888) 283-8245 or via web form at <https://ipscorp.com/privacy-policies.php>

Who do we collect personal information from?

We collect and process personal information of various categories of persons in order to function and to maintain a relationship with the people that we hold personal information about.

We collect and process personal information about:

- Website visitors

- Customers, Suppliers, Business Partners (and their employees)
- Employees, Contractors and Staff (and applicants / candidates)
- Other visitors and people we connect with for professional or social reasons

What personal information does IPS Corporation collect and why?

Categories of Personal Information We Collect

During the past 12 months, we may have collected the following categories of your personal information:

Identifiers and Contact Information. This category includes names, addresses, telephone numbers, mobile numbers, email addresses, signatures, account names, dates of birth, bank account information, and other similar contact information and identifiers.

Protected Classification Information. This category includes characteristics of protected classifications under California or federal law.

Commercial Information. This category includes, without limitation, products and services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

Education Information. This category includes, without limitation, information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, Sec. 1232g; 34 C.F.R. Part 99).

Internet or Other Electronic Network Activity Information. This category includes, without limitation, browsing history, search history, or a consumer's interactions with a website, application, or advertisement.

Geolocation Data. This category includes, without limitation, location information collected when using one of our apps, devices, or vehicles.

Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information. This category includes, without limitation, information collected from voicemail messages, while speaking with one of our service representatives, and/or by video camera.

Biometric Information. This category includes, without limitation, fingerprint, hand geometry, or facial scans used for timekeeping and/or security purposes.

Professional and Employment-Related Information. This category includes, without limitation, information regarding job applications, information related to onboarding for payroll and benefits, and information needed for evaluating performance.

Sensitive Personal Information. This category includes:

- social security, driver's license, state identification card, or passport number;
- log-in, financial account, debit card, or credit card number, in combination with any required security or access code, password, or credentials allowing access to an account;
- precise geolocation;
- racial or ethnic origin, religious or philosophical beliefs, or union membership;
- content of mail, email, and text messages (unless we are the intended recipient of the communication);

- genetic data;
- biometric information;
- health information; and
- information regarding sex life or sexual orientation.

Consumer Profile. This category includes information drawn from any of the categories above to create a profile about a consumer reflecting the consumer's preferences, characteristics, and behaviors.

Sources of Personal Information and Purposes for Collection

1. Website visitors

Information that you provide voluntarily

Certain parts of our Website and Services may ask you to provide personal information: for example, we may ask you to provide your contact details (including your name, title, company, address, telephone number and email address). We may use this information for the purposes set out below:

- to improve our products and services;
- to respond to online queries, supply requested information on IPS Corporation products, process and ship orders, fulfill online marketing offers, establish approved links and for internal market analysis;
- to periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided;
- to contact you for market research purposes. We may contact you by email, phone, fax or mail. We may use the information to customize this Website according to your interests; and
- for the specific purpose stated on forms on this Website.

Information that we collect automatically

When you visit our Website, we may collect certain information automatically from your device. In some countries, including countries in the United States and European Economic Area, this information may be considered personal information under applicable data protection laws.

Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g., country or city-level location) and other technical information. We may also collect information about how your device has interacted with our Website, including the pages accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our Website, where they come from, and what content on our Website is of interest to them. We use this information for our internal analytics purposes, to improve the quality and relevance of our Website to our visitors, and in connection with our advertising and marketing efforts.

Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading "Cookies and similar tracking technology" below.

2. Customers, Suppliers, Business Partners, and Visitors

If you are a current or prospective customer or supplier of ours (or if you are an employee, contractor, agent or other representative of a current or prospective customer or supplier of ours), we may collect and use the following personal information about you:

- Identification data – such as your name, date of birth, photograph.
- Contact details – such as business or delivery address, telephone/business email address, fax number, etc.
- Professional details – such as your job title/position, employer, company registration number, etc.
- Financial characteristics – such as account number and bank details, invoice address.
- National identifiers – such as tax ID and VAT number.
- Information relating to your (or your employer's) sales history with us.
- Other information you choose to provide to us, for example the purpose of your visit if you visit one of our site locations.
- IP addresses or other information that we may collect from you if you visit our Website

We may collect and use this personally identifiable information ("PII") about you for the following purposes:

- For the purpose of general business relationship management within IPS Corporation, including contract management; for example, to enable us to deliver our services to you (or your employer), or to audit the provision of services by you (or your employer) to IPS Corporation.
- To manage our daily business activities, such as executing payments [or to set up a credit arrangement with you or your employer];
- To manage any queries, complaints or claims relating to the services you (or your employer) provide to IPS Corporation or that IPS Corporation provides to you (or your employer);
- For direct marketing, advertising and public relations purposes, in connection with IPS Corporation's business activities, products and services (including to make recommendations about our services and products), and to inform you (or your employer) about important developments within IPS Corporation;
- For product development purposes, to allow us to improve our products and services or develop new products and services;
- Where necessary to comply with laws and regulations, under judicial authorization, or to exercise or defend the legal rights of IPS Corporation group companies;
- To help us conduct our business more effectively and efficiently or check and improve the quality of our products and/or services;
- To carry out research and development with various IPS Corporation partners;
- To investigate violations of law or breaches of other IPS Corporation policies.

3. Employees, Contractors and other staff

When we source candidates, we minimize the personal information that we collect and process to only that which is necessary for recruitment. This Privacy Policy Notice applies to the recruitment of employees, interns and other staff.

When we employ successful candidates, contractors, temporary labor, etc. we have a need to collect and process additional information needed for the purposes of carrying out the obligations and exercising specific rights related to these individuals' employment with us. This Privacy Policy Notice applies to our employees when we use their personal information.

4. Other visitors and people we connect with

There might be occasions where we interact with people who are not regular contacts of ours. For example, we may hold events and have functions that may be attended by visitors and friends of friends. In those instances, we may collect:

- Identification data – such as your name, date of birth, photograph.
- Contact details (including emergency contact details) – such as next of kin details, email address, contact phone number.
- Professional details – such as your job title/position, employer, company registration number, etc.
- Other information you choose to provide to us, for example the purpose of your visit if you visit one of our site locations.

We may collect and use this personal information about you for the following purposes:

- For the management of our guest list
- For safety regulations and reasons related to emergency evacuations and roll call
- Photos and video footage may be taken to document and promote our events, business and activities

Further use of personal information

In general, we will use the personal information we collect from you only for the purposes described in this Privacy Notice, for compatible purposes, or for purposes that we explain to you at the time we collect your personal information. Along with the purposes describe above, we may also use your personal information for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, if and where this is permitted by applicable data protection laws.

Who do we disclose your personal information to and for what purposes?

We may disclose your personal information to the following categories of recipients:

- to our group of operating companies & subsidiaries, third party services providers and partners who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Website), or who otherwise process personal information for purposes that are described in this Privacy Notice or notified to you when we collect your personal information.
- to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;

- to an actual or potential buyer (and its agents and advisers) in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice;
- to any other person with your consent to the disclosure.

Cookies and similar tracking technology

We may use cookies and similar tracking technology (collectively, “Cookies”) to collect and use personal information about you, including to serve interest-based advertising. We and our third-party service providers may use a variety of online tracking technologies, including cookies, flash cookies, web beacons/GIFs, embedded scripts, e-tags/cache browsers, that automatically (or passively) collect certain information whenever you visit or interact with our Services (“**Usage Information**”). Usage Information may include the browser that you are using, the URL that referred you to the Website, your IP address, or other unique identifier which is a number that is automatically assigned to the device (“**Device**”) used to access the Website, mobile application and/or Services (“**Device Identifier**”), the regional location derived from your IP address or geo-location data obtained from your Device as permitted in your settings on your Device, all of the areas within the Website and/or mobile application that you visit, and the time of day, and when and how you interact with the Services, among other information. Usage Information may be non-identifying or may be associated with personal information about you. This Usage Information is used for certain purposes including, for example, to provide identifying features to simplify your experience when you return to the Website.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off such cookies through your browser settings. Each browser is different, so look at your browser “Help” menu to learn the correct way to modify your cookies. If you choose to disable cookies on your Device, some features of the Services may not function properly.

Like most standard website servers, we may log Device Identifiers and the model and operating system of your computer and may track your movement within the Website, the pages from which you were referred, access times and browser types in order to improve security, analyze trends and administer the Services. We use this information in the aggregate to gauge the effectiveness, usage, and popularity of our Services, track information for statistical purposes, help diagnose and troubleshoot server malfunctions, analyze trends, track user movement in the aggregate, and gather broad demographic information and track traffic and sales by our affiliates. We may also use individual information we collect through web logs to send you targeted offers and other communications. We also track which Services are accessed and how long the Services are accessed.

Children

The Services are not aimed at nor intended for children under the age of 18. If you are under the age of 18, please do not use our Services. Our Website does not accept registration information from anyone under the age of 18. We recognize the importance of safeguarding the privacy of children and encourage parents to check and monitor their children’s use of online activities regularly. Additionally, our Website supports and complies with the Children’s Online Privacy Protection Act (“COPPA”) and other laws. No personally identifiable information (as defined in COPPA, 15 U.S.C. Section 6501) is purposefully or knowingly collected from children under the age of 13. Every visitor

hereby agrees that all information you provide, including but not limited to date of birth, shall be truthful and correct.

How do we keep your personal information secure?

IPS Corporation maintains commercially reasonable safeguards to protect your PII and other information you provide and ensure the security of our Website. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. IPS Corporation has a comprehensive information security program and works diligently to protect personal information. That said, no system for safeguarding personal or other information is 100% secure and, although we have taken steps to protect your personal information from being intercepted, accessed, used, or disclosed by unauthorized persons, we cannot fully eliminate security risks associated with personal information.

Please recognize that protecting your personal information is also your responsibility. We ask you to be responsible for safeguarding the password, security questions and answers, and other authentication information you use to access our websites or Services.

Links to or from our Services to other websites, services, or applications may exist. This Privacy Policy applies solely to information collected by our Services. We do not endorse or sponsor other websites (unless specifically disclosed), we are not responsible for the privacy practices or the content of other websites, expressly disclaim any statements or assertions made on such websites, and deny all liability associated with your use of, and the content on, such other websites. We encourage you to read the privacy policies or statements of the other websites you visit.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

International data transfers

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different from the laws of your country.

Specifically, our group of operating companies, subsidiaries, and third-party service providers and partners operate around the world. This means that when we collect your personal information, we may process it in any of these countries. If you do not want your information transferred to or processed or maintained outside of the country or jurisdiction where you are located, please do not use our websites or Services or otherwise provide your information to us.

Data retention

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements). To determine the appropriate retention period for your personal information, we consider various factors, such as the amount, nature, and sensitivity of your information; the potential risk of unauthorized access, use or disclosure; the purposes for which we collect or process your personal information; and applicable legal requirements.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

You can see when this Privacy Notice was last updated by checking the “last updated” date displayed at the top of this Privacy Notice.

How to contact us

If you have any requests about this privacy notice, including any request to exercise your legal rights, please contact us at privacy@ipscorp.com, via Toll free phone call at (888) 283-8245 or via web form at <https://ipscorp.com/privacy-policies.php>

European Economic Area (EEU) and UK Supplement

European Economic Area and UK Privacy Rights

This European Economic Area (EEA) and UK Supplement (“EEA/UK Section”) describes our policies and practices regarding the collection, use, and disclosure of personal data we collect about you directly or indirectly including through the Website, Services, and other sources.

This EEA/UK Section supplements and amends the information contained in the IPS Corporation Privacy Policy with respect to individuals located in the EEA and UK. The other provisions of the IPS Corporation Privacy Policy continue to apply except as modified in this EEA/UK Section. Any terms defined within the EU GDPR General Data Protection Regulation (“EU GDPR”) have the same meaning when utilized within this EEA/UK section.

For purposes of applicable data protection laws, IPS Corporation is the data controller of the personal data we collect through the Website, Services, and other sources. As data controller, we process your personal data in accordance with this EEA/UK Section.

If you are located in the European Economic Area or the UK, you may have the following data protection rights, subject to certain limitations under the EU GDPR and UK General Data Protection Regulation (“UK GDPR”):

- If you wish to access, correct, update or request deletion of your personal data, you can do so at any time by contacting us using the contact details provided under the “How to contact us” heading below.
- In addition, you can object to processing of your personal data, ask us to restrict processing of your personal data or request portability of your personal data. Again, you can exercise these rights by contacting us using the contact details provided under the “How to contact us” heading below.
- You can opt-out of marketing communications we send you at any time. You can do so by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), please contact us using the contact details provided under the “How to contact us” heading below.
- Similarly, if we have collected and process your personal data with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal.
- You have the right to complain to a data protection authority about our collection and use of your personal data. For more information, please contact your local data protection authority

In the UK, you have the right to complain to the Information Commissioner (ICO) about our collection and use of your personal data. You can contact the ICO at <https://ico.org.uk/>

Access to personal data

Under the EU GDPR and UK GDPR, you have a right to ask us what personal data we hold about you, request access to the personal data and information about its processing and request a copy of your personal data. This is known as a ‘subject access request’ (SAR). SARs need to be made in writing to our Privacy Manager. We have a subject access form you can use for this purpose which we will provide upon request, and we ask that your written request is accompanied by proof of identity. We have one calendar month within which to provide you with the information you’ve asked for (although we will try to provide this to you as promptly as possible).

Following your SAR, we will provide you with a copy of the personal data we hold that relates to you. This will not generally include information that relates to your product such as repair logs or details of engineer visits, as this is not considered personal data.

Rectification

If you need us to correct any mistakes or update incomplete personal data we hold about you, you can let us know by contacting us at privacy@ipscorp.com

Erasure (‘right to be forgotten’)

You have the right to ask us to delete personal data we hold about you. This right is not absolute. You can do this where:

- the personal data is no longer necessary in relation to the purpose for which we originally collected/processed it
- you withdraw consent and there is no other legal ground for processing
- you object to the processing and there is no overriding legitimate interest for us continuing the processing or the personal data is processed for direct marketing purposes

Commented [CMT(H1)]: JL NOTE: We suggest removing this statement since it can be confusing. Alternatively, consider stating that you will notify them if another lawful basis applies to processing that data.

- where we unlawfully processed the personal data
- the personal data has to be erased in order to comply with a legal obligation
- We can refuse to erase your personal data where the personal data is processed for the following reasons:
 - to exercise the right of freedom of expression and information;
 - to comply with a legal obligation or for the performance of a public interest task or exercise of official authority;
 - for public health purposes in the public interest;
 - archiving purposes in the public interest, scientific research historical research or statistical purposes;
 - the exercise or defense of legal claims; or
 - where we have an overriding legitimate interest for continuing with the processing

Restriction on processing

You have the right to request us to stop processing your personal data. When processing is restricted, we are allowed to store the information, but not do anything with it. You can do this where:

- You challenge the accuracy of the information (we must restrict processing until we have verified its accuracy)
- You challenge whether we have a legitimate interest in using the information (we must restrict processing until we have verified whether our legitimate interest overrides your interests)
- The processing is unlawful and you request restriction rather than erasure of your personal data
- We no longer need the personal data but you need the data to establish, exercise or defend a legal claim.

If we have disclosed your personal data to third parties, we will inform them about the restriction on processing, unless it is impossible or involves disproportionate effort to do so.

We will inform you when we decide to remove the restriction giving the reasons why.

Objection to processing

You have the right to object to processing carried out in the public interest, for purposes of direct marketing, or where we say it is in our legitimate business interests or those of a third party. We must stop using the personal data unless we can show there is a compelling legitimate reason for the processing, which overrides your interests.

Withdrawal of consent

You have the right to withdraw your consent to us processing your personal data at any time if the basis on which we are using your personal data is your consent.

Right to data portability

The right to data portability allows you to obtain and reuse your personal data for your own purposes across different services. It allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way. The right only applies to personal data you have

provided to us where the reason we are relying on to use the information is either your consent or for the performance of a contract. It also only applies when processing is carried out by us using automated means.

Legal basis for processing personal information

We process your personal data in accordance with the principles of the EU GDPR or UK GDPR.

If you are located in the European Economic Area or the UK, our legal basis for collecting and using the personal data described above will depend on the personal data concerned and the specific context in which we collect it.

However, we will normally collect personal data from you only (i) where we need the personal data to perform a contract with you, (ii) where the processing is in our legitimate interests and not overridden by your rights, or (iii) where we have your consent to do so. In some cases, we may also have a legal obligation to collect personal data from you or may otherwise need the personal data to protect your vital interests or those of another person.

If we ask you to provide personal data to comply with a legal requirement or to perform a contact with you, we will make this clear at the relevant time and advise you whether the provision of your personal data is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

If we collect and use your personal data in reliance on our legitimate interests (or those of any third party), this interest will normally be to operate our services and communicating with you as necessary to provide our services to you and for our legitimate commercial interest, for instance, when responding to your queries, improving our services, undertaking marketing, or for the purposes of detecting or preventing illegal activities. We may have other legitimate interests and if appropriate we will make clear to you at the relevant time what those legitimate interests are.

The purpose, type of personal data and lawful basis for processing is described below:

Purpose/Activity	Type of Data	Lawful basis for processing
To manage our relationship with you, including: <ul style="list-style-type: none">Updating you on our privacy policyAsking you to provide a review or complete a survey	Identity & Contact	<ul style="list-style-type: none">Necessary to comply with legal obligationNecessary for our legitimate interest (to keep our records up to date; manage the relationship)
To process product orders and delivery including: <ul style="list-style-type: none">Manage paymentCollect and recover money owed to usComplete site surveysDeal with any customer care issues regarding your orderInformation that you provide by filling in forms on our site	Identity & Contact	<ul style="list-style-type: none">Performance of a contract with youNecessary to comply with legal obligationNecessary for our legitimate interest (to keep our records up to date)

To process any after sales request including: <ul style="list-style-type: none"> • Warranty repair • Product technical support 	Identity & Contact	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary to comply with legal obligation • Necessary for our legitimate interest (to keep our records up to date)
To communicate information about; <ul style="list-style-type: none"> • Our products and services • Our local dealerships • Events • Competitions • Or other promotional purposes 	Identity & Contact	<ul style="list-style-type: none"> • Consent • Necessary for our legitimate interest (to keep our records up to date; for direct marketing)
<ul style="list-style-type: none"> • Account or profile information when you connect with us on social media; • Other publicly available personal data, including any which you have shared via a public platform (such as a Twitter feed or public Facebook page); • Information about your computer, including where available your IP address, operating system and browser type. This is statistical data about our users' browsing actions and patterns, and does not identify any individual • To use data analytics to improve our website, products, customer services marketing, customer relationships and experiences • To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you 	Technical, Usage & Legitimate Interests	<ul style="list-style-type: none"> • Consent • Necessary for our legitimate interests (to define types of customers for our products, to keep our website updated and relevant, to develop our business and to inform our marketing strategy; to keep our records up to date; for direct marketing)

[This list is not exhaustive], as we hold records of most contacts we have with you, or about you, and we process this personal data so we can deliver services to you. Generally, the personal data we hold will have been provided by you at point of order or directly to our team via email or over the phone.

We will only ask for personal data that is appropriate to enable us to deliver our services. In some cases, you can refuse to provide your details or opt out if you deem a request to be inappropriate. However, you should note that this may impact our ability to provide some services to you if you refuse to provide personal data that stops us from doing so.

International Transfers

We may transfer your personal data out of the EEA or UK for the purposes set forth in in this Privacy Policy. When we transfer your personal data out of the EEA or UK, we endeavor to ensure it receives a similar degree of protection as provided by the data protection laws of your jurisdiction. To obtain additional information on the mechanisms we use to transfer your personal data, please contact us at [insert].

Commented [CMT(H2)]: JL NOTE: Regulatory guidance requires fully addressing the collected data, use, and lawful bases, so this statement may create some risk.

If you have any requests about this privacy notice, including any request to exercise your legal rights, please contact us at privacy@ipscorp.com, via Toll free phone call at (888) 283-8245 or via web form at <https://ipscorp.com/privacy-policies.php>

USA States Supplement

Scope of Supplemental State Privacy Notice

This Supplemental State Privacy Notice applies to our processing of personal information under applicable laws in certain states, including California, Virginia, and Colorado.

The following table describes the categories of personal information IPS Corporation may disclose for business purposes (e.g., to a service provider). This may not be an exhaustive list of all data collected by our Services. For additional information about our disclosure practices, please see the “Who do we disclose your personal information to and for what purposes” section above.

Category of Personal Information Collected by IPS Corporation	Categories of Third Parties Personal Information is Disclosed to for a Business Purpose
Identifiers	Service providers IPS Corporation dealers and affiliates Third-party financing providers (as applicable) Advertising partners
Personal information categories	Service providers IPS Corporation dealers and affiliates Third-party financing providers (as applicable)
Commercial information	Service providers IPS Corporation dealers and affiliates Third-party financing providers (as applicable) Advertising partners
Internet or other electronic network activity	Service Providers IPS Corporation dealers and affiliates Third-party financing providers (as applicable) Advertising partners
Professional or employment-related information	Service providers IPS Corporation dealers and affiliates Third-party financing providers (as applicable)
Inferences drawn from other personal information to create a profile about a consumer	Service providers IPS Corporation dealers and affiliates Advertising partners

Additional Privacy Rights for Residents of Certain states

The categories of sources from which we collect personal information and our business and commercial purposes for using personal information are set forth above in the “Sources of Personal Information and Purposes for Collection” section. We do not process sensitive personal information to infer characteristics about individuals except as permitted by applicable state law.

Opt-Out of the “Sale” or “Sharing” of Personal Information

We engage in common marketing and advertising practices to provide more relevant content and ads to users of our websites and Services. Certain of these practices may involve the “selling” or “sharing”

of personal information, as those terms are defined in the California Consumer Privacy Act, as amended ("CCPA"). We do not sell personal information under the more commonly understood meaning of that word – i.e., providing personal information to third parties in exchange for money. Nor do we have actual knowledge of selling or sharing personal information of minors under the age of 16. To opt-out of the selling or sharing of your personal information, please click this link <https://ipscorp.com/privacy-policies.php>

We also treat Global Privacy Control browser signals as opt-out of sale/sharing requests and process these requests in a "frictionless manner" (as defined under the CCPA). To opt-out via the Global Privacy Control, please follow the instructions available [here](#). The Digital Advertising Alliance also enables global opt-outs; instructions are available [here](#). Please note that your request to opt-out of sale/sharing will be linked to your browser identifier only. If you use a different computer or Internet browser to access our sites, you will need to renew your opt-out request.

Right to Know

You have the right to request that we disclose the following to you upon receipt of your verifiable consumer request:

- The categories of personal information we have collected about you
- The categories of sources from which we collected that information
- The business or commercial purposes for collecting, selling, or sharing that information
- The categories of personal information we sold or disclosed for a business purpose
- The categories of third parties to whom we sold or disclosed that information
- The specific pieces of personal information we collected about you

Right to Delete

You have the right to request that we delete your personal information from our records, subject to certain exceptions. Upon receipt of a verifiable consumer request, and as required by the CCPA, we will delete and direct any service providers to delete your personal information.

We are not required to comply with deletion requests if we, or our service providers or contractors, need the subject 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 us and you.
- 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 their 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.
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us and compatible with the context in which you provided the information to us.

- Comply with a legal obligation.
- Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

Right to Correct

You have the right, subject to certain limitations, to request that we correct any inaccurate personal information we maintain about you. Upon receipt of a verifiable consumer request, and as required by the CCPA, we will take appropriate steps to respond to your request.

Right to Limit Use or Disclosure of Sensitive Information

You have the right to request limitations on the use and disclosure of your sensitive personal information, as that term is defined in the CCPA, to the extent that such information is used to infer characteristics about you for a purpose other than those listed in Section 7027 of the CCPA regulations. We do not use sensitive personal information for any such purpose.

Non-Discrimination

Residents of certain states have the right not to receive discriminatory treatment by us for the exercise of their rights conferred by applicable law. For example, we generally will not provide you a different level or quality of goods or services if you exercise these rights.

Submitting Rights Requests

Authorized Agent

Only you, or a person or business entity legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. To designate an authorized agent, provide written authorization signed by you and your designated agent and please contact us as set forth above. We reserve the right to deny requests from persons or businesses claiming to be authorized agents that do not submit sufficient proof of their authorization.

Verification

When you make a request, we will ask you to provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include confirming the email address associated with any personal information we have about you. If we cannot verify your identity from the information we have on file, we may request additional information from you, which we will only use to verify your identity, and for security or fraud-prevention purposes. Making a verifiable consumer request does not require you to create an account with us. Additionally, you will need to describe your request with sufficient detail to allow us to review, understand, assess, and respond.

Our Response

We reserve the right to charge a fee to process or respond to your request if it is excessive, repetitive, or manifestly unfounded. If we determine that a request warrants a fee, we will attempt to

notify you as to why we made that decision and provide a cost estimate before completing your request. We will endeavor to respond to a verifiable consumer request within forty-five (45) calendar days of receipt, but we may require an extension of up to forty-five (45) additional calendar days to respond and we will notify you of the need for the extension.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the receipt of your verifiable consumer request. With respect to personal information collected on and after January 1, 2022, and to the extent expressly permitted by applicable regulation, you may request that such disclosures cover a period beyond the 12 months referenced above, provided doing so would not be impossible or require a disproportionate effort by us. The response we provide will also explain the reasons we cannot comply with a request, if applicable. To the extent permitted by the CCPA, we will respond to no more than two requests during any 12-month period.

Supplemental Notice for California

California Shine the Light. The California “Shine the Light” law permits users who are California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed their personal information (if any) for their direct marketing purposes in the prior calendar year, as well as the type of personal information disclosed to those parties. If you are a California resident and would like to request this information, please contact us. Please mention when contacting us that you are making a “California Shine the Light” inquiry. We will respond within 30 days of receiving your request. You may make Shine the Light requests only once per calendar year. We reserve the right not to respond to requests submitted other than in accordance with the instructions specified in this paragraph.

Eraser Law. If you are a California resident under the age of 18, and a registered user of any site where this policy is posted, California law permits you to request and obtain removal of content or information you have publicly posted. You may submit your request using the contact information in the “How to contact us” section of this policy. Please be aware that such request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.

Supplemental Notice for Nevada

Under Nevada law, Nevada residents may opt out of the sale of certain “covered information” collected by operators of websites or online services. You can exercise this right by contacting us at privacy@ipscorp.com with the subject line “Nevada Do Not Sell Request” and providing us with your name and the email address associated with your account. Please note that we do not currently “sell” your personal information as that term is defined in Nevada Revised Statutes Chapter 603A. If you have any questions, please contact us at privacy@ipscorp.com.

Canada Supplement

This section applies only to Canadian residents. It supplements and amends the information contained in the Privacy Policy with respect to Canadian residents. The other provisions of the Privacy Policy continue to apply, except as modified in this section.

- Storage Outside Canada. Please note that we may store personal information we collect from you outside of Canada.
- Right to Access. You have the right to request that we inform you of the existence, source, use, and disclosure of your personal information and that we provide you access to that information.
- Right of Rectification. You have the right to challenge the accuracy and completeness of your personal information and to request that it be amended.
- Right to Withdraw Consent. You have the right to withdraw your consent to our collection, use, or disclosure of your personal information.

We may require you, when making a request, to provide sufficient information to enable us to verify your identity and respond to your request. We will generally respond to your request within 30 days, though there may be instances in which it is necessary and appropriate to extend that timeframe for up to an additional 30 days. In accordance with applicable law, we may, in certain instances, deny your request in full or in part. In the event we deny your request, we will so inform you and explain our denial.

To submit a complaint to us regarding our data privacy or security practices, please follow the instructions in the “How to contact us” section above. You may also submit a complaint to the Office of the Privacy Commissioner of Canada by following the instructions available [here](#).