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Hart & Cooley Website Privacy Policy

Effective as of December 11, 2020

This Privacy Policy is designed to help you understand how Hart & Cooley, LLC and its related organizations and affiliates, including Selkirk Corp and Selkirk Canada Corp. ("Hart & Cooley", "we" or "us"), collects, uses and shares personal information collected through this website. We value your privacy, and we will not share your personal information with third parties except as described in this Privacy Policy without your consent.

BY USING THIS WEBSITE, YOU AGREE TO BE BOUND BY THIS PRIVACY POLICY. IF YOU DO NOT AGREE WITH ANY OF THE TERMS OF THE PRIVACY POLICY, PLEASE DO NOT USE THIS WEBSITE OR PROVIDE US WITH YOUR INFORMATION.

What this Privacy Policy Covers

This Privacy Policy applies to our collection, use and sharing of your personal information (a) when you visit our website at <https://www.hartandcooleyllc.com> (<https://www.hartandcooleyllc.com>) and its related sites, including <http://www.selkirkcorp.com> (<http://www.selkirkcorp.com>) and <http://www.selkirkcorp.ca> (<http://www.selkirkcorp.ca>) (collectively, the "Site"), (b) receive our communications or participate in our online or offline activities or events, (c) fill out a job application on our website, and (d) that we obtain from third parties such as resellers, database vendors, content publishers and suppliers.

This Privacy Policy applies only to information gathered on and through the Site and does not apply to any other information or websites not owned or operated by Hart & Cooley or information collected by Hart & Cooley by other means.

Personal Information We Collect

Information You Give Us.

Personal information you may provide through the Site or otherwise communicate to us includes:

- Contact information. We collect information about you when you provide contact information to us via email, mail, or through the Site, including as a result of creating an account, filling out a job application through the Site, registering for a promotion, or purchasing our products. This information may include your first and last name, email address, mailing address, and phone number.
- Feedback and correspondence. We may collect information about you when you request information, respond to surveys, or otherwise correspond with us.
- Other information. We may collect other information from you that is not specifically listed here. We may use such information in accordance with this Privacy Policy.

Information We Get from Others.

We may obtain additional information about you from third party sources, such as service providers, distributors, social media sites, and advertising agencies to provide you with more relevant information about our services.

Information Automatically Collected.

Our servers and third party service providers may automatically record certain information about how you use the Site, such as your Internet Protocol (IP) address, device and browser type, operating system, DNS, the pages or features of the Site that you browsed and the time spent on those pages or features, the frequency with which you use the Site, the links that you click on or use, and other statistics. We collect this information in server logs and by using cookies and similar tracking technologies. See our Cookie Policy, below, for more information.

Statistical Analyses.

We use Google Analytics to help us gather statistical information about the visitors to our Site and how they use the Site on an anonymous, aggregate basis. However, we will not associate this data with your personally identifiable data unless required to do so to cooperate with law enforcement activity or other governmental request or to comply with law. We may use this information to gain a better understanding of the users of our Site, to improve our Site, and to improve our services. Depending on the type of browser and device that you use, you may have the ability to control the type of information that Google Analytics use. To understand how Google Analytics collects and processes data, please visit www.google.com/policies/privacy/partners/ (<http://www.google.com/policies/privacy/partners/>). We reserve the right to license or sell aggregate, de-identified information about the visitors to our Site, but this information will not contain your personal information or otherwise be individually identifiable.

How We Use Your Personal Information

We use your personal information for the following purposes and as otherwise described to you in this Privacy Policy or at the time of collection:

To Provide the Site and Communicate with You.

We use your personal information:

- to provide, maintain and improve the Site;
- to better understand your needs and interests and personalize your experience with the Site;
- to register you for promotions;
- to respond to your requests, questions, comments, and feedback; and
- to perform website analytics and database management services.

To Send You Marketing Communications.

We may send you newsletters, promotions or other marketing communications, but you may opt out of receiving them as described in the Your Choices section below.

To Create and Maintain Your Account.

To utilize some of the services provided through the Site, you may create an account using certain personal information, including your name, email address, and phone number. You have choices about the information included in your account profile. You do not have to provide additional information on your profile; however, additional profile information may help you get more from our services. It is your choice whether to include sensitive information on your profile and to make that sensitive information public. Please do not post or add personal data to your profile that you would not want to be publicly available.

For Compliance, Fraud Prevention and Safety.

We may use your personal information as we believe appropriate to: (a) investigate or prevent violation of the law or your agreements with us; (b) protect our, your or others' rights, privacy, safety or property (including by prosecuting and defending legal claims); (c) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity; (d) comply with applicable laws, lawful requests and legal process, such as to respond to subpoenas or requests from government authorities; and (e) where permitted by law in connection with a legal investigation. For example, we may share information with law enforcement to reduce the risk of fraud or if someone uses or attempts to use our site for illegal reasons.

With Your Consent.

In some cases, we may ask for your consent to collect, use or share your personal information.

How We Share your Personal Information

We do not sell your personal information. However, we may share your information with third parties for various purposes described below. Unless otherwise indicated at the time we collect your information, if we allow third parties to access the personal information we collect, we will have contractual provisions or other appropriate protections in place to ensure such access is for limited purposes and in compliance with this Privacy Policy. We may share your information in the following circumstances:

Related and Affiliated Organizations.

We may share your personal information with Hart & Cooley's affiliates and related organizations, such as Selkirk Corp and Selkirk Canada Corp., for use consistent with this Privacy Policy.

Service Providers and Business Partners.

We may share your personal information with third party companies and individuals as needed for them to provide us with services that help us with our business activities and to promote our services to you. For example, we may hire a company to run certain website applications, help us analyze our data, or send information on our behalf about services and events in which you may be interested. We may also share your personal information with our business partners who offer a service to you jointly with us. A list of our current service providers and business partners who have access to certain personal information we collect is available upon request.

Security, Compliance, Fraud Prevention, Safety; Compliance with Law.

We may disclose your personal information as we believe appropriate to government or law enforcement officials or private parties for the purposes described above under the following sections: For compliance, fraud prevention and safety and for compliance with law.

Business Transfers.

We may sell, transfer or otherwise share some or all of our business or assets, including your personal information, in connection with a business deal (or potential business deal) such as a merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy.

Your Choices

Opt Out of Communications.

You may opt out of marketing-related emails by changing the communication preferences in your account settings or by following the opt-out prompt in the email. To opt out of other forms of marketing communications, please contact us using the contact information provided at the end of this Policy.

Consequences of Not Providing Personal Information.

You are not required to provide all personal information identified in this Privacy Policy to use our Site or to interact with us offline, but certain functionality will not be available if you do not provide personal information. For example, if you do not provide personal information, we may not be able to respond to your request, perform a transaction with you, or provide you with marketing that we believe you would find valuable.

Cookie Policy

Cookies are small data files that are placed on your computer or mobile device when you visit a website. We may cookies on this Site to enable Site functioning, measure and improve the performance of our Site, and provide enhanced functionality. We may also allow third parties to place cookies on our site that enable certain features or functionality, such as advertising or website analytics, to be provided on or through the Site. The third parties that set these cookies can recognize your computer or device both when you visit our Site and also when you visit certain other websites and/or mobile apps. For example, we use Google Analytics to provide us with demographic information about our visitors and to help us analyze how people use our website. To learn more about how Google use cookies, please click the link above to view its privacy policy.

Cookies are not the only way to track visitors to a website. We may use similar technologies from time to time like web beacons (sometimes called "tracking pixels" or "clear gifs"). These are tiny graphics files that contain a unique identifier that enable us to recognize when someone has visited our Sites. These technologies often depend on cookies to function properly, and so disabling cookies may impair their functioning. If you sign up to receive our e-mails, we will also use cookies in conjunction with these emails. When your browser downloads any graphic content in the e-mail, we will also place a cookie on your computer that will tell us if you come to our website at a later date.

How Can You Disable Cookies and Other Tracking Technology?

Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. For more information about cookies, including how to see what cookies have been set on your computer or mobile device and how to manage and delete them, visit www.allaboutcookies.org (<http://www.allaboutcookies.org>), and www.youronlinechoices.com (<http://www.youronlinechoices.com>).

Some Internet browsers also may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" or similar signals. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com> (<http://www.allaboutdnt.com>).

Other Important Privacy Information

Third Party Sites and Services.

The Site may contain links to other websites and services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any third party. We do not control third party websites, applications or services, and we are not responsible for their actions. Other websites and services follow different rules regarding their collection, use and sharing of your personal information. We encourage you to read their privacy policies to learn more.

Security.

The security of your personal information is important to us. We take a number of organizational, technical and physical measures that are designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the absolute security of your personal information.

Cross-Border Data Transfers.

Any information you provide to us through the use of the Site may be stored, processed, transferred among, and accessed from the United States and other countries (for a list of other countries, please contact us), which may not guarantee the same level of protection of personal information as the one in which you reside. However, we will handle your personal information in accordance with this Privacy Policy regardless of where your personal information is kept. Regarding transfers from the European Economic Area ("EEA"), we rely on the derogations for transfers which are necessary to perform the transaction with you. Where required by law, you may request a copy of the suitable mechanisms we have in place by contacting us as detailed below. If you reside in other non-US jurisdictions outside the EEA, your use of the Site or provision of any personal information constitutes your consent for the transfer of such data to the United States for the purposes identified above. If you have questions about cross-border transfers, please contact us as detailed below.

Verifying, Changing, and Deleting Your Information.

If you have registered for an account through our Site, you can access, review and manage many changes yourself via your account, including updating your information and changing your communication preferences. Otherwise, you can contact us as detailed below and ask us to change, update or fix your information in certain cases, particularly if it is inaccurate. You can also request that we erase or delete all or some of your personal information or otherwise object to, limit, or restrict the use of such information (if we have no legal right or legitimate business interest in retaining such information).

Children.

The Site is not intended for use by anyone under the age of 13, nor do we knowingly collect or solicit personal information from anyone under the age of 13. If you are under 13, you should not attempt to use the Site or send any information about yourself to us.

Notice to California Residents

The following section applies to California residents.

- *Shine the Light.* Under California's "Shine the Light" law, you have the right to ask us once a year if we have shared your personal information with third parties for direct marketing purposes. To make a request please contact us as instructed in the "How to Contact Us" section below and specify you are making a Shine the Light request.
- *California Consumer Privacy Act ("CCPA").* The CCPA creates consumer privacy rights and requires businesses to make disclosures about their privacy policies and practices. Pursuant to the CCPA, both our privacy practices and your privacy rights are discussed in detail in the following information.

Personal Information We Collect.

We collect your personal information when you interact with our Site or otherwise communicate with us. For the purposes of this Privacy Notice, "personal information" means information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device.

Category of Personal Information Collected	Business Purpose of Collection	Source(s) of Information
Identifiers, including real name, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, and telephone numbers	To provide you with our products and to market our products to you.	Directly from you when you contact us or respond to promotions
Characteristics of protected classifications under California or federal law, including age or date of birth, race, color, national origin, physical disabilities, mental disabilities, medical condition, sex, military or veteran status, and criminal conviction history	To consider you for employment	Directly from you if you share in connection with an employment application
Occupation, professional, or employment-related information	To consider you for employment	Directly from you if you share in connection with an employment application
Commercial information, including records of products purchased	To provide you with our products	Directly from you if you purchase our products
Internet or other electronic network activity information, including browsing history, search history, and information regarding an individual's interaction with an internet Web site, application or advertisement	To provide you more relevant content, track original Site visits, and optimize your Site experience as well as to ensure our systems are properly functioning.	Passively when you visit our Site
Geolocation Data	To assist in marketing and identify Site traffic patterns.	Passively when you visit our Site

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible business purposes without providing you notice.

Sharing Your Information.

We do not sell your personal information, but may disclose it to third parties for a business purpose. Specifically, in the past 12 months we have disclosed identifiers such as online identifiers and IP address, geolocation data, and Internet or other electronic network activity information to our third party service providers, including internet service providers, operating systems and platforms, and marketing intelligence service providers. We have also disclosed identifiers such as name, email address and telephone numbers to our distributors if you have asked us to contact them on your behalf.

Your Rights.

The CCPA gives you certain rights regarding your personal information:

- Right to Know. You may request no more than twice in a 12-month period that we provide you with copies of specific personal information we have collected, sold, or disclosed about you. However, under California law, we cannot provide you with certain sensitive information, despite your request (for example, we will not send you copies of your social security number even if it is something we collected).
- Right to Delete. You may request that we delete certain personal information we have collected about you, with certain exceptions.

Exercising Your Rights.

To exercise your rights above, please submit a request to us by [clicking here \(https://www.hartandcooleyllc.com/privacy-policy/california-rights-form\)](https://www.hartandcooleyllc.com/privacy-policy/california-rights-form), or contacting us as detailed at the end of this policy. Please describe your request with sufficient detail so we can properly respond to your request. As part of your request, please specify which right you are exercising and be prepared to provide your name and contact information. We may ask for additional information to verify your identity. The information you provide in your request and any follow up information we ask for from you will be used solely to verify your request.

After receiving your request, we may need to contact you for further information and will notify you if your request has been granted or declined, or if an exception applies to your request. Only you or an individual designated as your authorized agent to act on your behalf may make a request related to your personal information. We may not discriminate against you if you choose to exercise your rights.

Responding to Your Rights Request.

We will try to respond to your request within 45 days. If we need more time, we will contact you with the reason we need more time and the extension period. We will deliver our written response by mail or electronically, at your option. In response to your request to know, we will only disclose the information we have collected in the 12 months prior to our receipt of your request. Our response will also explain the reasons we cannot comply with any request, if applicable.

We do not charge a fee to process or respond to your request unless your request is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate prior to completing your request.

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make changes to this Privacy Policy, we will post them on the Site and indicate the effective date of the change. If we make material changes to this Privacy Policy we will notify you by email or through the Site.

How to Contact Us

Hart & Cooley LLC
Attn: Privacy Matters
5030 Corporate Exchange Blvd.
Grand Rapids, MI 49512
United States of America
Email: jgantos@hartcool.com (<mailto:jgantos@hartcool.com>)
Phone: (800) 433-6341

This Privacy Policy was last updated December 11, 2020

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