

## **Sloan Privacy Policy**

Last Revised: April 21, 2023

This privacy policy ("Privacy Policy") describes how Sloan Valve Company, Sloan Global Holdings, and/or Sloan Marketplace LLC, Sloan Water Technologies Limited, and their respective applicable affiliates (collectively, "Sloan", "we" or "our") processes and treats information about you that Sloan collects and receives through this website, and Sloan's other websites and online locations, including web applications, mobile applications and social media (collectively, the "Sites") and through other interfaces with and aspects of Sloan's business, including offline.

Please note that when you purchase goods or services through sloan.com or other websites operated by Sloan, you are purchasing goods and services from Sloan Marketplace LLC ("Sloan Marketplace"). This Privacy Policy together with the [Terms of Use](#), governs your use of the Sites and Sloan Marketplace, Sloan's collection, use, and disclosure of your information both through the Sites and offline.

Please also note that while this Privacy Policy also describes how Sloan collects and treats information about you in connection with the subscription services for Sloan Internet of Things (IOT) restroom products, the Sloan Terms of Use (referenced above) are not applicable to and do not govern the use of these subscription services, the associated IOT product software or the use of any Sloan Application Programming Interface (API) for such products and services, as these products and services are governed by their own respective and independent terms of service, use and purchase, as applicable. The Sites and Sloan Marketplace are referred to together throughout this Privacy Policy as the "Services". Sloan acts as a Data Controller of the personal data collected and processed regarding customers, trial participants, suppliers, and Site visitors and is registered with the UK Information Commissioner's Office (Application Number C1777446).

### **1. Acceptance of Privacy Policy**

Each time you access, use, register with, shop, or browse the Sites, or provide information to Sloan online or offline, you signify your acknowledgement and acceptance of the most recent version of this Privacy Policy. In doing so, you agree to the collection and use of information as described in this Privacy Policy for essential website functions, such as security, fraud prevention, and providing requested services as well as for non-essential activities such as marketing communications, analytics, and personalized advertising, for which we will provide clear opt-in mechanisms as required by applicable law. You may withdraw your consent at any time by contacting us at [dpo@sloan.com](mailto:dpo@sloan.com) or using the opt-out mechanisms described in this policy. If you do not accept this Privacy Policy, you are not authorized to access, use or browse the Sites, or otherwise make use of the Services and must discontinue use of the Sites immediately. If you provide your information to Sloan offline, the then-current Privacy Policy applies to Sloan's collection and use of your information.

This Privacy Policy is subject to be revised or updated from time to time. Accordingly, you should check the Privacy Policy regularly for updates. Should the Privacy Policy be revised, Sloan will post the changes on the Sites and the new Privacy Policy will be effective immediately upon posting. If Sloan makes any material changes to the Privacy Policy, in addition to posting the revised Privacy Policy to the Sites, Sloan will notify you in the manner and to the extent required by law. You can determine when the Privacy Policy was last revised by referring to the "Last Revised" date at the top of this page.

### **2. Types of Information Collected**

We may collect personally identifiable information from you including, without limitation, non-public information about you that helps Sloan identify you.

If you create an account with Sloan, or make a purchase from Sloan Marketplace, you will need to provide additional information.

We may permit you to interact with social media platforms (such as LinkedIn, Facebook, and Twitter) and other third party platforms, including by using existing login information from a third-party platform to create or login to your account with us on Sloan

Marketplace. When you interact with third party platforms through the Sloan Marketplace, we will receive information about you. The information we collect is subject to this Privacy Policy. The information collected and stored by the third party remains subject to the third party's privacy practices, including, without limitation, whether the third party continues to share information with us, the types of information shared, and your choices with regard to what is visible to others on that third-party website or service. We or the third party may allow you to disable or remove the application or feature, in which case we will no longer collect information about you through the application or feature, but we may retain the information previously collected.

The information we collect on or through our Services may include:

Context	Types of Data	Primary Purpose for Collection and Use of Data
User Information	First and last name, birth date, business title, email address, home telephone number, occupation, preferences, and other information that you provide to Sloan or that is generated through your use of the Sites or interactions with Sloan that are not otherwise publicly available.	The processing of this information is necessary for contract fulfillment.
User Account Information	Password, account username, order information,	The processing of this information is necessary for contract fulfillment.
Employer Information	Employer name, employer address, office telephone number, mobile telephone number,	The processing of this information is necessary for contract fulfillment.
Payment and purchasing Information	Credit card, debit card and other payment information, billing and shipping information, purchasing and transaction history	The processing of this information is necessary for contract fulfillment.
General Product information	Information regarding products you purchase from Sloan Marketplace or products that you contact customer service about (e.g., serial number, fixture manufacturer, date of installation, place of purchase, etc.), information you provide to us when you register your product online, register in connection with our web or mobile applications,	The processing of this information is necessary for contract fulfillment.
Product Usage information	Product settings, adjustments made to products, device usage patterns and frequency data, maintenance and operational status information, environmental data (temperature, humidity, occupancy patterns), device performance and error logs	The processing of this information is necessary for contract fulfillment.

Cookies and first party tracking	Information regarding your use of the Sites, Sites usage statistics, time stamps, browsing history, information on if you click on Sloan's ads when you see them	We have a legitimate interest in processing this information.
Device Information	Unique device identifier of your devices that connect to or access the Sites, type of device, type of computer operating system you use (e.g., Microsoft Windows, Google Chrome OS, Mac OS, Android or iOS), the type of browser you use (e.g., Firefox, Chrome, Internet Explorer, Safari), the domain name of your internet service provider	We have a legitimate interest in processing this information.
Cookies and third party tracking	Information about your browsing and interaction activities on third party social media platforms (such as LinkedIn, Facebook, and Twitter) and other third party platforms, when you use existing login information from a third-party platform to create or login to your account with us on Sloan Marketplace or on sites where our advertisements appear.	We have a legitimate interest in processing this information.
Location Information	Your IP address, general geographic location, information regarding your Internet location when you see Sloan's ads, location data for installed devices, addresses of the relevant building(s) that you own, lease, manage or service and their restroom facilities (if you are using the subscription services for the remote monitoring and control of Sloan IOT products).	We have a legitimate interest in processing this information and to use it to improve our products and services.
Website interactions	Certain aggregated or anonymous information regarding users of the Sites such as the age, gender, occupation, zip code, interests, purchase preferences, and language preferences of users of the site, as well as information collected through questionnaires and surveys.	We have a legitimate interest in processing this information.
Non-personally identifiable information	Information collected on our server logs from your browser as well as through other analysis of the Sites.	We have a legitimate interest in processing this information.

If you are a current or former employee of Sloan or an applicant to Sloan, we may collect information about you in connection with your employment or candidacy. Details of our collection, use and disclosure of such information is available on our Employee and Candidate Privacy Notice which is available at <https://legal.sloanwatertechnology.co.uk/#employee-privacy-notice>.

### 3. IoT Products and Services

If you make use of any Sloan IoT products and services, you are subject to additional terms of service that govern device functionality, software licensing, and API usage. IoT-Specific Data Collection. Our connected restroom products may collect additional types of information, including:

- Device usage patterns and frequency data

- Maintenance and operational status information
- Environmental data (temperature, humidity, occupancy patterns)
- Device performance and error logs
- Location data for installed devices.

This information is used to:

- Provide remote monitoring and maintenance services
- Improve product performance and reliability
- Generate usage analytics and reports for facility managers
- Predict maintenance needs and optimize operations
- Ensure compliance with health and safety standards.

IoT Data Sharing: For IoT services, we may share aggregated, anonymized usage data with: Facility management companies (with customer consent) - Product development teams for improvement purposes - Third-party maintenance providers (as necessary for service delivery). We do not share personally identifiable information from IoT devices without explicit written consent, except as required by law or for safety purposes. For complete terms governing IoT device functionality and software, please refer to the [IoT Terms of Service](#). In case of conflict between this Privacy Policy and IoT-specific terms regarding data practices, this Privacy Policy governs.

If you are a resident of a US state such as California, Utah, Virginia, Colorado, Connecticut, and others that have enacted laws and regulations that provide additional privacy protections and rights to their resident consumers, you may have additional rights and options with respect to the categories of personally identifiable information that we collect, and those will be noted in Section 14 below. The categories may include identifiers, customer records information, your gender identity, commercial information, internet or other electronic network activity information, geolocation data and information reflecting your preferences and characteristics relevant to your use of our products and services. Except as otherwise indicated, all of this information is collected for the purpose of providing you with the products and services that you wish to receive from us.

We also may collect non-personally identifiable information about you or we may receive certain aggregated or anonymous information regarding users of the Sites. If you sign up to receive our subscription services for Sloan IOT restroom products, please refer to our [Terms of Service](#) applicable to this service for information about what other non-personally identifiable information we collect. "Non-personally identifiable information" refers to information that does not personally identify the individual to whom the information relates, such as information that is aggregated by Sloan or a third party, or information that is not linked to contact information or other personally identifiable information of an individual.

In the event that any of the non-personally identifiable information that we collect about you is maintained, used or shared in a manner that associates it with your name, contact information or other personally identifiable information, it will be treated as personally identifiable information. If you are logged into your account on the Sites, information such as the content you access, view, click on or search for when on the Sites, the devices from which you access such content and the length of time for which you view same, may become personally identifiable. In such an event, Sloan will treat such information as personally identifiable information.

#### **4. How We Collect Information**

We may collect personally identifiable and/or non-personally identifiable information from you when you:

- Access, use or browse the Sites;
- Purchase products and/or services from the Sites, including Sloan Marketplace LLC;
- Register for an account on the Sites;

- Sign up to receive announcements, emails or newsletters;
- Contact, communicate with or otherwise interact with Sloan or its personnel via email, the Sites, fax, telephone, or by other means whether online or offline;
- Order or request products, literature, services or other information during your visit to the Sites, via email, fax or other online or offline means;
- Register your product with us;
- Access, use or adjust any product settings or functional parameters;
- Make a product warranty claim;
- Register, enroll or participate in any surveys, questionnaires, promotions, or any other services, events or activities online or offline sponsored by Sloan or third parties, or offered in connection with the Sites of Sloan's products or services ("Activities").

By using the Sites, or by submitting your personally identifiable information to Sloan online or offline, you expressly consent to the storage and processing of your personally identifiable information in the United States in accordance with the laws of the United States, or in other jurisdictions as applicable..

We may obtain personally identifiable and/or non-personally identifiable information from third parties such as the owners or operators of the websites or applications where our advertisements appear (some of which may partner with Sloan or with an advertisement network used by Sloan), our service providers, affiliates, suppliers, vendors, distributors, activities partners and sponsors, and other sources (e.g., offline records or publicly available information). We may combine personally identifiable information we collect with information that we obtain from these sources. We will treat any such combined information as personally identifiable information.

Sloan also may collect information using cookies, web beacons, pixels, gifs, tags or similar technologies ("Collection Technology"), or through third parties using similar technologies. Collection Technology may operate as a piece of data stored on your browser or device, or may identify, compile, aggregate and/or collect information through other means. When you visit the Sites, your web browser may use Collection Technology to better enable you to navigate the Sites during your visit and upon your return. You may use the Sites even if you choose to reject or delete certain Collection Technology. Collection Technology also may be used by some of the other websites for which a link is placed on the Sites.

The Sites may use Google Analytics. Google Analytics uses Collection Technology to collect and store anonymous information about you, which may include the non-personally identifiable information described above. You can read Google Analytics' privacy policy at <http://www.google.com/intl/en/policies/privacy> and Google Analytics' Terms of Use at <http://www.google.com/analytics/tos.html>. You can opt-out from being tracked by Google Analytics in the future by downloading and installing Google Analytics' Opt-out Browser Add-on for your current web browser at <http://tools.google.com/dlpage/gaoptout?hl=en>. The Sites may use certain features of Google Analytics based on Display Advertising, such as:

"Demographics and Interest Reporting" to analyze information regarding the interests and demographics of users of the Sites. We use such non-personally identifiable information in the same manner as we use other non-personally identifiable information as described below.

"Remarketing with Google Analytics" to place ads on other sites directed to people who have visited the Sites.

"Google Display Network Impression Reporting" to report how people's interactions with our ads relate to their visits to the Sites.

You can opt-out of Google Analytics for Display Advertising and customize Google Display Network ads by changing the ad settings at: <https://www.google.com/settings/ads>.

Applications on mobile devices may transmit information to Sloan about your location when you request information from the Sites. We may use that information to improve the products and services we provide to you.

When you use a Sloan mobile application (“Mobile App”), we collect and use information about you in the same way and for the same purposes as we do when you use our Sites. In addition to this, we also use some other information that we collect automatically when you use our Mobile Apps. We collect information about Mobile App functionality that you access and use, which allows us to identify those areas of the Mobile App that are of interest to our users so that we can continuously improve our Mobile App, and to identify the products with which you interact, the locations thereof and the settings, adjustments and changes that you make thereto. The information we collect for this purpose enables us to indirectly identify you.

Each Mobile App also sends us the device’s Unique Device Identifier (or “UDI”), a sequence of numbers or characters that are unique to your mobile device and may be your mobile telephone number. We use this UDI in connection with every action you take when operating and using the Mobile App. When you use a Mobile App, you can choose to allow access to your current location – provided by your mobile device using GPS or similar technologies – in order to identify nearby events or places of interest. If you choose to allow access, this location data may be collected anonymously and logged by our servers. You can disable the Mobile App’s access to your location at any time through your phone settings menu.

Each Mobile App will also send us error-reporting information in the event that it crashes or hangs or the product with which the Mobile App facilitates connection is faulty, reports errors or is adjusted outside its allowable parameters, which enables us to investigate the error and to improve the stability of the Mobile App and the products for future releases. As part of these error reports, the Mobile App sends us information about the mobile device and product type and version, the UDI, the time the error or adjustment occurred, the feature being used, and the state of the application and product when the error or adjustment occurred.

You cannot control all the information that a Mobile App sends to us, but to the extent available you may change the available settings of the Mobile App under its “settings” menu, or changing the available settings of your mobile device. Alternatively, you can remove the Mobile App from your mobile device entirely.

## **5. How We Use Your Information**

We may use the information we collect:

- To monitor and analyze information regarding your browsing and viewing preferences and to diagnose problems with the Sites;
- To analyze our users’ demographics, interests, and purchasing practices;
- Fulfill orders, ship and confirm orders, and manage payment collection across our Sites;
- To plan, improve and administer Activities;
- To process and respond to your product warranty claims, inquiries and other communications;
- For Sites administration, support and improvement;
- To alert you to new features, terms, Activities, special events, stores, products or services, and other useful information regarding any of the foregoing or Sloan via email, direct mail telephone or other means;
- To market or promote other Sloan products and/or services to you;
- To promote and improve the products and services we offer;
- To send announcements and newsletters, and to provide you with personalized content in connection with same;
- To provide you with information that you have requested or that we think may interest you, including sending you promotional offers that we or our affiliates may make available;
- Investigate and prevent fraudulent transactions and other illegal activities or activities that violate our policies;
- For the purposes for which you provided the information;
- For fraud prevention, internal operations, legal compliance, and other public purposes; and

- To enforce the Terms of Use.

In addition to the uses discussed above, Sloan may use non-personally identifiable information for other purposes in its de-identified or aggregated form. These uses may include, without limitation, analysis of trends and how the Sites are used; improving navigation of the Sites; analysis of the performance of the Sites and diagnosis of problems; analysis and developing advertisements and advertising campaigns; and providing you with special offers and promotions and determining the effectiveness of same.

Sloan also may use your non-personally identifiable information and email address to present you with targeted content and advertisements (including on third party websites and applications). Such targeted content and advertisements may include marketing for the Sites, and the products or services of Sloan or its business and advertising partners. Your non-personally identifiable information also may be used to optimize and determine the effectiveness of content and advertisements, and to analyze interactions with content and advertisements.

Some of our third party advertisers or display networks may participate in the Digital Advertising Alliance's Self-Regulatory Program for Online Behavioral Advertising and allow consumers the ability to opt-out of targeted advertising based on web activity tracking. For more information regarding the foregoing, please visit <http://www.aboutads.info/choices/>. Please note that after clicking the link and following the instructions provided therein, even if our third party advertisers or display networks participate in the Digital Advertising Alliance's Self-Regulatory Program for Online Behavioral Advertising and you opt out of targeted advertising based on web activity tracking, you still may receive standard advertisements from us and targeted advertisements from third parties. You may need to re-click the link and follow the instructions provided therein if you delete cookies or other Collection Technology or use a different computer, device or browser.

#### **6. How We Respond To "Do Not Track" Signals**

Sloan does not respond to or alter its practices detailed herein based upon your selection of the "Do Not Track" setting or other "opt out" setting or feature that may be offered by your browser; however, Sloan may adopt this practice in the future.

#### **7. Communications with You**

You authorize Sloan to transmit email or postal mail to you or to telephone you, to respond to your communications, promote our services and administer and provide information to you about Activities. If we send any emails to promote our services, unsubscribe instructions will be included in each such promotional email from Sloan. Please note that such requests may take up to ten (10) business days to become effective. You may not opt out of receiving communications regarding your dealings with Sloan, the Sites or technical information about the Sites.

For the purposes of any applicable law regarding notification of persons whose personal information was, or is reasonably believed to have been, acquired by an unauthorized person, any required notification may, where permitted by law, be made by the use of e-mail, telephone, fax or mail (including a notice printed in an available area of a bill or statement) or by posting a notice on the Sites. The specific means used is up to us, and we will use our best judgment based on the circumstances. Where any notice is to be sent to a specific address or number (such as an e-mail address, physical address, telephone number, etc.), we will use the latest available address in our records. YOU AGREE TO THIS MEANS OF NOTIFICATION.

#### **8. Information Sharing with Third Parties**

Sloan may disclose personal information to third parties only in the following limited circumstances and with appropriate safeguards:

- (i) **Service Providers:** To service providers who perform functions on our behalf (such as payment processing, shipping, customer service, and website hosting) under contractual obligations to protect your information and use it only for the specified purposes;
- (ii) **Business Partners:** To business partners for joint marketing activities or co-sponsored events, but only with your explicit consent and with the ability to opt out;
- (iii) **Legal Requirements:** When required by law, court order, or government request, or to protect our legal rights and safety;

(iv) **Business Transfers:** In connection with a merger, acquisition, or sale of assets, where the recipient agrees to honor this Privacy Policy;

(v) **Affiliates:** To our corporate affiliates for internal business purposes, subject to the same privacy protections as this Policy;

(vi) **With Your Consent:** As otherwise authorized by you for specific purposes.

All third parties who receive personal information from us are contractually required to:

- Use the information only for the specified purpose
- Implement appropriate security measures
- Not further disclose the information without authorization
- Delete the information when no longer needed for the specified purpose

We do not sell personal information to data brokers or for general marketing purposes by unrelated third parties. We do not share any personally identifiable information for any such purposes in connection with the subscription services for Sloan IOT restroom products unless we first obtain your express signed written consent.

We also may share your information in response to a subpoena, legal order or official request, when we believe you have acted in violation of the Terms of Use, to investigate, prevent or take action regarding suspected illegal activities, fraud or potential threats, or to exercise legal rights or defend against claims, when we believe that doing so may protect your safety or the safety of Sloan or others, or as otherwise permitted or required by law.

We also may use and share non-personally identifiable information with other third parties. Additionally, we may take personally identifiable information and de-identify it and share it in a de-identified, anonymized or aggregated form with advertisers, business partners, and/or other third parties in order to analyze the Sites usage, demographics, or interests, improve the Sites or Sloan's products or services, perform services on the Sites, improve the user experience, or for similar purposes. We will not re-identify such data and we will ask our contracting parties to agree to keep the data in its de-identified or anonymized form.

## 9. Children

The Sites are not directed toward children under 18 years of age nor does Sloan knowingly collect information from children under 18 on the Sites or offline. If you are under 18, you are not permitted to register for an account on the Sites or to otherwise submit any personally identifiable information to Sloan. If you provide information to Sloan through the Sites or offline, you represent that you are 18 years of age or older.

## 10. Protection of Personal Information

Sloan uses reasonable administrative, physical and electronic security measures to protect against the loss, misuse and alteration of personally identifiable information. No transmission of data over the internet, wi-fi, Bluetooth®, or other communication protocol is guaranteed to be completely secure. It may be possible for third parties not under the control of Sloan to intercept or access transmissions or private communications unlawfully. While we strive to protect personally identifiable information, neither Sloan nor our service providers can ensure or warrant the security of any information you transmit to us over the internet. Any such transmission is at your own risk. We encourage you to take steps to protect your personal information, such as using strong passwords and keeping your login credentials confidential. In the event of a data breach that may affect your personal information, we will notify you and relevant authorities as required by applicable law.

## 11. Updating Your Information

You are responsible for keeping your information current. You may update your information by contacting us and we will use reasonable efforts to process any change you make; provided, however, that requests to delete information are subject to Sloan's internal reporting, processing and retention policies and all applicable legal obligations. We will use reasonable efforts to process any

change you make; provided, however, that requests to delete information are subject to Sloan's internal reporting, processing and retention policies and all applicable legal obligations.

## 12. Data Retention

We retain personal information for different periods depending on the purpose for which it was collected and applicable legal requirements:

Type of Information	Retention Period
Account Information:	We retain account information for as long as your account remains active, plus 7 years after account closure for business records purposes
Transaction Records:	Purchase and transaction data is retained for 7 years to comply with financial recordkeeping requirements.
Marketing Communications:	Contact information for marketing purposes is retained until you opt out or for 3 years of inactivity, whichever comes first.
Website Analytics:	Aggregated and anonymized website usage data may be retained indefinitely for business analysis purposes.
Customer Service Records:	Support interactions are retained for 3 years to improve service quality and resolve disputes.
IoT Device Data:	Data from connected restroom products is retained according to the specific terms of service for those products, typically 2 years unless longer retention is required for warranty or safety purposes.
Legal Hold:	We may retain information longer when required by law, regulation, litigation, or government request.
Automatic Deletion:	We have implemented automated systems to delete personal information when retention periods expire, except where longer retention is legally required.

## 13. Notice of Your State Privacy Rights

Depending on your state of residency, you may have certain rights related to your personal data, including:

1. **Access and Data Portability.** You may confirm whether we process your personal data and access a copy of the personal data we process. To the extent feasible and required by state law, depending on your state, data will be provided in a portable format. Depending on your state, you may have the right to receive additional information and it will be included in the response to your access request.
2. **Correction.** You may request that we correct inaccuracies in your personal data that we maintain, taking into account the information's nature and processing purpose.
3. **Deletion.** You may request that we delete personal data about you that we maintain, subject to certain exception under applicable law.
4. **Opt Out of Using Personal Data for Targeted Advertising, Profiling, and Sales.** You may request that we do not use your personal data for these purposes.
5. **Important:** The exact scope of these rights vary by state. There are also several exceptions where we may not have an obligation to fulfill your request.

To exercise any of these rights, please submit a request to [dpo@sloan.com](mailto:dpo@sloan.com). To appeal a decision regarding a consumer rights request please submit notice of your appeal to [dpo@sloan.com](mailto:dpo@sloan.com) citing specifically the reason for your appeal and, if desired, contact your State's Attorney General to lodge a complaint.

Some browsers and browser extensions support the Global Privacy Control ("GPC") that can send a signal to process your request to opt out from certain types of data processing, including data "sales" as defined under certain laws. When we detect such a signal, we will make reasonable efforts to respect your choices indicated by a GPC setting as required by applicable law.

Some states (Nevada, California) provide residents with a limited right to opt out of certain personal data sales. Residents who wish to exercise their sale opt-out rights may submit a request by emailing us at [dpo@sloan.com](mailto:dpo@sloan.com) or by calling us at the following toll free number: 888-756-2612. To exercise your right to limit the use of your sensitive personal information, such as limiting use of such information solely to provide you with the products or services that you requested, you can simply click on the "Limit The Use Of My Sensitive Personal Information" link [here](#) or click on the "Limit The Use of My Sensitive Personal Information" link that is displayed on the Site home page.

However, please know we do not currently sell data triggering that statute's opt-out requirements.

**14. If you are a California resident, additional information applies to you. To access our supplemental California privacy statement and learn more about California residents' privacy rights, please read below.**

If you are a California resident consumer, California resident professional or California resident employee of Sloan or California resident job applicant to Sloan, effective January 1, 2020, you are afforded additional rights under the California Consumer Privacy Act including its most recent amendments set forth under the California Privacy Rights Act (collectively the "CCPA") regarding the collection, use, disclosure and sale of your personal information and/or sensitive personal information.

Under the CCPA, "personal information" is information that identifies, relates to, or could reasonably linked directly or indirectly with you or your household. Personal information generally does not include information that is publicly available.

Under the CCPA, California resident consumers, California resident professionals and California resident employees of Sloan, including California resident job applicants to Sloan, are afforded the right to contact us and submit to us a request to know any or all of the following:

1. Specific pieces of personal information that we have about you
2. The categories of personal information we have collected about you
3. The categories of sources from which personal information about you was collected

4. The categories of personal information about you that we sold or disclosed for a business purpose
5. The categories of third parties to whom the personal information about you were sold or disclosed for a business purpose; and
6. The business or commercial purpose for collecting or selling personal information about you

**DISCLOSURE STATEMENT**

**CCPA Categories of Personal Information and Sensitive Personal Information Collected and Shared; Purposes for Use; Categories of Third Parties with whom shared**

**CALIFORNIA CONSUMERS:** The following table provides details about the personal information and/or sensitive personal information that we collect and handle in connection with California consumers within the preceding twelve (12) months.

**Identifiers**

Contact information (such as your first and last name, birth date, business title, occupation, name of employer, employer address, shipping and billing address and information, email address and office, home and mobile telephone numbers); unique identifiers (such as a device identifier, account username and password); financial information (such as a credit or debit card number and other payment information); and online identifiers (such as an internet protocol (IP) address and a social media channel ID). Note that financial information (such as a credit or debit card number) is not stored by us as this type of payment is handled through our payment processing service providers.

Disclosure	Description
Sources from which collected	We collect this category of information from you or your device(s) when you provide it to us or interact with us online (such as through our Sites or our social media). We also collect this information from third parties such as financial institutions, payment processors, and social networks.
Purpose of collection	We collect this category of information to identify, better understand, and communicate with you; to create and administer accounts; to process orders, payments, and refunds; to provide, improve, market, and personalize our products and services and third-party products and services; for physical security, cybersecurity, incident response, and risk reduction purposes; for legal, recordkeeping, and compliance purposes; and for other purposes communicated to you at the time of collection.
Categories of Third Parties with whom shared	We disclose this category of information to related or affiliated companies under our control and to various third party service providers who provide various business support services so that we can run our business operations, promote, market, advertise, sell and/or deliver our various products and services, and to other third parties (such as law enforcement) in order to comply with our legal obligations or to provide fraud protection and security services.

## Legally protected demographics

Such as your race, ethnicity, or gender identity.

Disclosure	Description
Sources from which collected	We collect this category of information from you when you provide it to us or interact with us online (such as through our Sites, as defined above, or our social media). We also collect this information from third parties, such as social networks.
Purpose of collection	We collect this category information to improve, market, and personalize our products and services (including our Sites); for physical security and incident response; for legal, recordkeeping, and compliance purposes; and for other purposes communicated to you at the time of collection.
Categories of Third Parties with whom shared	We disclose this category of information to related or affiliated companies under our control; to service providers that provide fraud prevention and security services; and to other third parties (such as law enforcement) as required by law.

## Commercial information

Such as records of the products or services you purchased or considered purchasing from us, order information, purchasing and transaction history, Sloan product purchase preferences, information regarding products you purchase from Sloan Marketplace or products that you contact customer service about (e.g., serial number, fixture manufacturer, date of installation and place of purchase) and other commercial related information that you provide to us when you register your product online, register in connection with our web or mobile applications and other information that you provide us that is generated through your use of the Site or interactions with Sloan not otherwise publicly available.

Disclosure	Description
Sources from which collected	We collect this category of information from you or your device(s) when you provide it to us or interact with us online (such as through our Sites or our social media).
Purpose of collection	We collect this category of information to better understand and communicate with you; to create and administer accounts; to process orders, payments, and refunds; to provide, improve, market, and personalize our products and services (including our Sites); for physical security, cybersecurity, incident response, and

	risk reduction purposes; for legal, recordkeeping, and compliance purposes; and for other purposes communicated to you at the time of collection.
Categories of Third Parties with whom shared	We disclose this category of information to related or affiliated companies under our control; to service providers that provide customer experience management, product fulfilment, marketing, and fraud prevention and security services; and to other third parties (such as law enforcement) as required by law.

## Internet or other electronic network activity information

Such as your browsing history, search history, interactions with the Sites, product settings, adjustments made to products, type of device you use to connect to the Sites, type of computer operating system you use (e.g., Microsoft Windows, Google Chrome OS, Mac OS, Android or iOS), the type of browser you use (e.g. Firefox, Chrome, Internet Explorer, Safari), the domain name of your internet service provider and information regarding your Internet location when you view Sloan ads, including whether you have clicked on those ads, the content you accessed while on the Sloan Sites and the length of time you viewed the content.

Disclosure	Description
Sources from which collected	We collect this category of information from you or your device(s) when you provide it to us or interact with us online (such as through our Sites, or our social media). We also collect this information from third parties such as online advertising networks, online data aggregators, and social networks.
Purpose of collection	We collect this category of information to identify, better understand, and communicate with you; to administer accounts; to process orders, payments, and refunds; to provide, improve, market, and personalize our products and services and third-party products and services (including our Site); for physical security, cybersecurity, incident response, and risk reduction purposes; for legal, recordkeeping, and compliance purposes; and for other purposes communicated to you at the time of collection.
Categories of Third Parties with whom shared	We disclose this category of information to related or affiliated companies under our control; to service providers that provide customer experience management, marketing, fraud prevention and security; to third parties who set cookies and tags for third-party marketing and advertising (subject to your right to opt out, as defined below); and to other third parties (such as law enforcement) as required by law.

## Geolocation information

Your physical location.

<b>Disclosure</b>	<b>Description</b>
Sources from which collected	We collect this category of information from you or your device(s) when you provide it to us or interact with us online (such as through our Sites or our social media).
Purpose of collection	We collect this category of information to identify, better understand, and communicate with you; to administer accounts; to provide, improve, market, and personalize our products and services (including our Site); for physical security, cybersecurity, incident response, and risk reduction purposes; for legal, recordkeeping, and compliance purposes; and for other purposes communicated to you at the time of collection.
Categories of Third Parties with whom shared	We disclose this category of information to related or affiliated companies under our control; to service providers that provide customer experience management, marketing, fraud prevention and security; and to other third parties (such as law enforcement) as required by law.

## **Sensory information**

Audio, electronic, visual, thermal, olfactory, or similar information related to you.

<b>Disclosure</b>	<b>Description</b>
Sources from which collected	We collect this category of information from you or your device(s) when you provide it to us or interact with us online (such as through our Sites or our social media).
Purpose of collection	We collect this category of information to identify, better understand, and communicate with you; to provide, improve, and market our products and services (including our Sites); for physical security, cybersecurity, incident response, and risk reduction purposes; for legal, recordkeeping, and compliance purposes; and for other purposes communicated to you at the time of collection.
Categories of Third Parties with whom shared	We disclose this category of information to related or affiliated companies under our control; to service providers that provide customer experience management and fraud prevention and security; and to other third parties (such as law enforcement) as required by law.

## Inferences

Inferences drawn from any of the information identified above.

Disclosure	Description
Sources from which collected	We draw inferences about you from the information we collect from you or your device(s) when you provide it to us or interact with us online (such as through our Sites or our social media). We also draw inferences about you from the information we collect from third parties such as financial institutions, payment processors, and social networks.
Purpose of collection	We draw these inferences to better understand, and communicate with you; to provide, improve, market, and personalize our products and services (including our Sites); and for other purposes communicated to you at the time of collection.
Categories of Third Parties with whom shared	We disclose this category of information to related or affiliated companies under our control and to third parties (such as law enforcement) as required by law.

**CALIFORNIA PROFESSIONALS:** The following table provides details about the personal information and/or sensitive personal information that we collect and handle within the preceding twelve (12) months for residents of California who interact with us in a professional/business capacity or in connection with a business to business relationship (instead of a business to consumer relationship). Such residents typically work for some of our suppliers, manufacturers, distributors, payment processors and/or other entities that provide general business and/or office support services.

## Identifiers

Contact information (such as your first and last name, birth date, business title, occupation, name of employer, employer address, names of your associates, shipping and billing address and information, email address and office, home and mobile telephone numbers); unique identifiers (such as a device identifier, account username and password); financial information (such as a credit or debit card number and other payment information); and online identifiers (such as an internet protocol (IP) address and a social media channel ID). Note that financial information (such as a credit or debit card number) is not stored by us as this type of payment is handled through our payment processing service providers.

Disclosure	Description
Sources from which	We collect this category of information from you or your device(s) when you provide it to us or interact with us online (such as through our Sites or our social media). We also collect this information from third parties such

collected	as financial institutions, payment processors, social networks, product and services suppliers, product manufacturers, distributors and general business and/or office support service providers.
Purpose of collection	We collect this category of information to identify, better understand, and communicate with you and your business; to create and administer accounts; to administer and manage events; to make announcements; to help manufacture, design, develop, promote and distribute our products, services and marketing campaigns; to process orders, purchases, payments and refunds; to provide, improve, market, and personalize our products and services and third-party products and services; to promote for physical security, cybersecurity, incident response, and risk reduction purposes; to conduct research; for business and legal, recordkeeping and compliance purposes; for general business and office management and operational support; and for other purposes communicated to you at the time of collection.
Categories of Third Parties with whom shared	We disclose this category of information to related or affiliated companies under our control and to various third party service providers who provide various business support services or to support a business to business relationship that we have established with a supplier, manufacturer, retail distributor or other business that provides us with general business operational and/or office management support, and to other third parties (such as law enforcement) in order to comply with our legal obligations or to provide fraud protection and security services.

## Legally protected demographics

Such as your race, ethnicity, or gender identity.

Disclosure	Description
Sources from which collected	We collect this category of information from you when you provide it to us or interact with us online (such as through our Sites, as defined above, or our social media). We also collect this information from third parties, such as social networks.
Purpose of collection	We collect this category information to improve, market, and personalize our products and services (including our Sites); for physical security and incident response; for legal, recordkeeping, and compliance purposes; and for other purposes communicated to you at the time of collection.
Categories of Third Parties with whom shared	We disclose this category of information to related or affiliated companies under our control; to service providers that provide fraud prevention and security services; and to other third parties (such as law enforcement) as required by law.

## Commercial information

Such as records of the products or services you purchased or considered purchasing from us, order information, purchasing and transaction history, Sloan product purchase preferences, information regarding products you purchase from Sloan Marketplace or products that you contact customer service about (e.g., serial number, fixture manufacturer, date of installation and place of purchase) and other commercial related information that you provide to us when you register your product online, register in connection with our web or mobile applications and other information that you provide us that is generated through your use of the Site or interactions with Sloan not otherwise publicly available.

Disclosure	Description
Sources from which collected	We collect this category of information from you or your device(s) when you provide it to us or interact with us online (such as through our Sites or our social media) and you likely work for one of our suppliers or manufacturers or general business support service providers.
Purpose of collection	We collect this category of information to identify, better understand, and communicate with you and your business; to create and administer accounts; to administer and manage events; to make announcements; to help manufacture, design, develop, promote and distribute our products, services and marketing campaigns; to process orders, purchases, payments and refunds; to provide, improve, market, and personalize our products and services and third-party products and services; to promote for physical security, cybersecurity, incident response, and risk reduction purposes; to conduct research; for business and legal, recordkeeping and compliance purposes; for general business and office management and operational support; and for other purposes communicated to you at the time of collection.
Categories of Third Parties with whom shared	We disclose this category of information to related or affiliated companies under our control and to various third party service providers who provide various business support services or to support a business to business relationship that we have established with a supplier, manufacturer, retail distributor or other business that provides us with general business operational and/or office management support, and to other third parties (such as law enforcement) in order to comply with our legal obligations or to provide fraud protection and security services.

## Internet or other electronic network activity information

Such as your browsing history, search history, interactions with the Sites, product settings, adjustments made to products, type of device you use to connect to the Sites, type of computer operating system you use (e.g., Microsoft Windows, Google Chrome OS, Mac OS, Android or iOS), the type of browser you use (e.g. Firefox, Chrome, Internet Explorer, Safari), the domain name of your internet service provider and information regarding your Internet location when you view Sloan ads, including whether you have clicked on those ads, the content you accessed while on the Sloan Sites and the length of time you viewed the content.

<b>Disclosure</b>	<b>Description</b>
Sources from which collected	We collect this category of information from you or your device(s) when you provide it to us or interact with us online (such as through our Sites or our social media). We also collect this information from third parties such as financial institutions, payment processors, social networks, product and services suppliers, product manufacturers, retail distributors and general business and/or office support service providers.
Purpose of collection	We collect this category of information to identify, better understand, and communicate with you and your business; to create and administer accounts; to administer and manage events; to make announcements; to help manufacture, design, develop, promote and distribute our products, services and marketing campaigns; to process orders, purchases, payments and refunds; to provide, improve, market, and personalize our products and services and third-party products and services; to promote for physical security, cybersecurity, incident response, and risk reduction purposes; to conduct research; for business and legal, recordkeeping and compliance purposes; for general business and office management and operational support; and for other purposes communicated to you at the time of collection.
Categories of Third Parties with whom shared	We disclose this category of information to related or affiliated companies under our control and to various third party service providers who provide various business support services or to support a business to business relationship that we have established with a supplier, manufacturer, retail distributor or other business that provides us with general business operational and/or office management support, and to other third parties (such as law enforcement) in order to comply with our legal obligations or to provide fraud protection and security services.

## **Geolocation information**

Your physical location, including the physical addresses of the relevant building(s) that you own, manage or service.

<b>Disclosure</b>	<b>Description</b>
Sources from which collected	We collect this category of information from you or your device(s) when you provide it to us or interact with us online (such as through our Sites or our social media). We also collect this information from third parties such as financial institutions, payment processors, social networks, product and services suppliers, product manufacturers, retail distributors and general business and/or office support service providers.
Purpose of collection	We collect this category of information to identify, better understand, and communicate with you and your business; to create and administer accounts; to administer and manage events; to make announcements; to help manufacture, design, develop, promote and distribute our products, services and marketing campaigns; to

	process orders, purchases, payments and refunds; to provide, improve, market, and personalize our products and services and third-party products and services; to promote for physical security, cybersecurity, incident
	response, and risk reduction purposes; to conduct research; for business and legal, recordkeeping and compliance purposes; for general business and office management and operational support; and for other purposes communicated to you at the time of collection.
Categories of Third Parties with whom shared	We disclose this category of information to related or affiliated companies under our control and to various third party service providers who provide various business support services or to support a business to business relationship that we have established with a supplier, manufacturer, retail distributor or other business that provides us with general business operational and/or office management support, and to other third parties (such as law enforcement) in order to comply with our legal obligations or to provide fraud protection and security services.

## Sensory information

Audio, electronic, visual, thermal, olfactory, or similar information related to you.

Disclosure	Description
Sources from which collected	We collect this category of information from you or your device(s) when you provide it to us or interact with us online (such as through our Sites or our social media). We also collect this information from third parties such as financial institutions, payment processors, social networks, product and services suppliers, product manufacturers, retail distributors and general business and/or office support service providers.
Purpose of collection	We collect this category of information to identify, better understand, and communicate with you and your business; to create and administer accounts; to administer and manage events; to make announcements; to help manufacture, design, develop, promote and distribute our products, services and marketing campaigns; to process orders, purchases, payments and refunds; to provide, improve, market, and personalize our products and services and third-party products and services; to promote for physical security, cybersecurity, incident response, and risk reduction purposes; to conduct research; for business and legal, recordkeeping and compliance purposes; for general business and office management and operational support; and for other purposes communicated to you at the time of collection.

Categories of Third Parties with whom shared	We disclose this category of information to related or affiliated companies under our control and to various third party service providers who provide various business support services or to support a business to business relationship that we have established with a supplier, manufacturer, retail distributor or other business that provides us with general business operational and/or office management support, and to other third parties (such as law enforcement) in order to comply with our legal obligations or to provide fraud protection and security services.
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## Inferences

Inferences drawn from any of the information identified above.

Disclosure	Description
Sources from which collected	We collect this category of information from you or your device(s) when you provide it to us or interact with us online (such as through our Sites or our social media). We also collect this information from third parties such as financial institutions, payment processors, social networks, product and services suppliers, product manufacturers, retail distributors and general business and/or office support service providers.
Purpose of collection	We collect this category of information to identify, better understand, and communicate with you and your business; to create and administer accounts; to administer and manage events; to make announcements; to help manufacture, design, develop, promote and distribute our products, services and marketing campaigns; to process orders, purchases, payments and refunds; to provide, improve, market, and personalize our products and services and third-party products and services; to promote for physical security, cybersecurity, incident response, and risk reduction purposes; to conduct research; for business and legal, recordkeeping and compliance purposes; for general business and office management and operational support; and for other purposes communicated to you at the time of collection.
Categories of Third Parties with whom shared	We disclose this category of information to related or affiliated companies under our control and to various third party service providers who provide various business support services or to support a business to business relationship that we have established with a supplier, manufacturer, retail distributor or other business that provides us with general business operational and/or office management support, and to other third parties (such as law enforcement) in order to comply with our legal obligations or to provide fraud protection and security services.

**CALIFORNIA EMPLOYEES AND JOB APPLICANTS:** The following table provides details about the personal information and/or sensitive personal information that we collect and handle within the preceding twelve (12) months for residents of California who are our employees or who are job applicants.

## Identifiers

Contact information (such as your name, the name of your former employers, names of your references, your former professional or corporate titles, your home address, email address, telephone and fax numbers, including the same contact information about your references); unique identifiers (such as your social security number, alien or I-94 number); financial information (such as your bank account); credit and background history; and online identifiers (such as an internet protocol address and a social media channel ID). Note that certain financial information (such as a credit or debit card number) is not stored by us as this types of payment is handled through our payment processing service providers.

Disclosure	Description
Sources from which collected	We collect this category of information from you or your device(s) when you provide it to us or interact with us online (such as through our Sites, intranet or our social media), in writing or in person and through service providers who may run a credit or background check on you.
Purpose of collection	We collect this category of information to identify, better understand, and communicate with you; to prepare and maintain employment records and job application records; to help us evaluate your prior employment history; to provide an electronic means for paying you through automatic deposits and to provide you with
	employment related benefits; to promote for physical security, cybersecurity, incident response, and risk reduction purposes; for business and legal, recordkeeping and compliance purposes; for general business and office management; and for other purposes communicated to you at the time of collection.
Categories of Third Parties with whom shared	We disclose this category of information to related or affiliated companies under our control and to third parties (such as law enforcement) in order to comply with our legal obligations or to provide fraud protection and security.

## Legally protected demographics

Such as your race, ethnicity, or gender identity.

Disclosure	Description
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Sources from which collected	We collect this category of information from you or your device(s) when you provide it to us or interact with us online (such as through our Sites, intranet or our social media), in writing or in person and through service providers who may run a credit history or background check on you.
Purpose of collection	We collect this category of information to identify, better understand, and communicate with you; to prepare and maintain employment records and job application records; to promote for physical security, cybersecurity, incident response, and risk reduction purposes; for business and legal, recordkeeping and compliance purposes; for general business and office management; and for other purposes communicated to you at the time of collection.
Categories of Third Parties with whom shared	We disclose this category of information to related or affiliated companies under our control and to third parties (such as law enforcement) in order to comply with our legal obligations or to provide fraud protection and security.

### Internet or other electronic network activity information

Such as your browsing history, search history, and interactions with the Sites.

Disclosure	Description
Sources from which collected	We collect this category of information from you or your device(s) when you provide it to us or interact with us online (such as through our Sites, intranet or our social media).
Purpose of collection	We collect this category of information to identify, better understand, and communicate with you; to prepare and maintain employment records and job applications; to help us evaluate your job performance; to provide you with employment related benefits; to promote for physical security, cybersecurity, incident response, and risk reduction purposes; for business and legal, recordkeeping and compliance purposes; for general business and office management; and for other purposes communicated to you at the time of collection.
Categories of Third Parties with whom shared	We disclose this category of information to related or affiliated companies under our control and to third parties (such as law enforcement) in order to comply with our legal obligations or to provide fraud protection and security.

## Geolocation information

Your physical location.

Disclosure	Description
Sources from which collected	We collect this category of information from you or your device(s) when you provide it to us or interact with us online (such as through our Sites, intranet or our social media).
Purpose of collection	We collect this category of information to identify, better understand, and communicate with you; to prepare and maintain employment records and job applications; to help us evaluate your job performance; to provide you with employment related benefits; to promote for physical security, cybersecurity, incident response, and risk reduction purposes; for business and legal, recordkeeping and compliance purposes; for general business and office management; and for other purposes communicated to you at the time of collection.
Categories of Third Parties with whom shared	We disclose this category of information to related or affiliated companies under our control and to third parties (such as law enforcement) in order to comply with our legal obligations or to provide fraud protection and security.

## Sensory information

Audio, electronic, visual, thermal, olfactory, or similar information related to you.

Disclosure	Description
Sources from which collected	We collect this category of information from you or your device(s) when you provide it to us or interact with us online (such as through our Sites, intranet or our social media), in writing or in person.
Purpose of collection	We collect this category of information to identify, better understand, and communicate with you; to prepare and maintain employment records and job applications; to help us evaluate your job performance; to provide you with employment related benefits; to promote for physical security, cybersecurity, incident response, and risk reduction purposes; for business and legal, recordkeeping and compliance purposes; for general business and office management; and for other purposes communicated to you at the time of collection.

Categories of Third Parties with whom shared	We disclose this category of information to related or affiliated companies under our control and to third parties (such as law enforcement) in order to comply with our legal obligations or to provide fraud protection and security.
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## Inferences

Inferences drawn from any of the information identified above.

Disclosure	Description
Sources from which collected	We collect this category of information from you or your device(s) when you provide it to us or interact with us online (such as through our Sites, intranet or our social media), in writing or in person.
Purpose of collection	We collect this category of information to identify, better understand, and communicate with you; to prepare and maintain employment records and job application records; to help us evaluate your prior employment history; to provide an electronic means for paying you through automatic deposits and to provide you with employment related benefits; to promote for physical security, cybersecurity, incident response, and risk reduction purposes; for business and legal, recordkeeping and compliance purposes; for general business and office management; and for other purposes communicated to you at the time of collection.
Categories of Third Parties with whom shared	We disclose this category of information to related or affiliated companies under our control and to third parties (such as law enforcement) in order to comply with our legal obligations or to provide fraud protection and security.

## Your Privacy Rights Under the CCPA

As a California resident consumer, professional, employee or job applicant, in addition to the right to know what personal information we collect, use, disclose and sell (previously discussed above), you are also afforded

1. the right to have your personal information deleted;
2. the right to have your personal information corrected;
3. the right to have your personal information transferred to a designated third party, i.e. right to data portability, and a right to receive a copy of your personal information;

4. the right to limit the use and disclosure of your sensitive personal information (e.g., only to have use of such information limited to providing you with the products and services that you have requested);
5. the right to opt-out of any sale of your personal information to a third party; and
6. the right not to be discriminated against should you exercise any of your CCPA rights.

Please note that your right to know, right to delete, the right to correct, the right of data portability and/or the right to limit may be subject to one or more limited exceptions, including but not limited to the following: we cannot verify you; we may not be required to provide you access to all of the specific pieces of information we have collected about you due to the sensitive nature of the information; we cannot honor your request to delete or limit information in certain circumstances. For example, we are not required to delete or limit information that is necessary to complete a requested transaction, to detect security incidents, the request interferes with our legal obligations or legal rights or for certain other internal purposes.

Selling your personal information and the right to opt-out of any sale of your personal information to a third party (discussed further below) may also be subject to (or not applicable to) certain limited exceptions such as if the selling or sharing of personal information is made to one of our service providers who is using such information in order to help us provide our products and/or services or such sharing or selling is necessary for us to comply with our legal obligations or to exercise our legal rights.

## **Submitting Your CCPA Right Requests**

If you are a California resident consumer, professional, employee or job applicant, you or your legally authorized agent acting on your behalf may submit your CCPA personal information requests by emailing us at [dpo@sloan.com](mailto:dpo@sloan.com) or by calling us at the following toll free number: 888-756-2612. To exercise your right to limit the use of your sensitive personal information, such as limiting use of such information solely to provide you with the products or services that you requested, you can simply click on the "Limit The Use Of My Sensitive Personal Information" link [here](#) or click on the "Limit The Use of My Sensitive Personal Information" link that is displayed on the Sloan web site home page.

**Identity Verification for Privacy Rights Requests.** To protect your privacy and prevent unauthorized access to your personal information, we use a risk-based approach to verify your identity: For Low-Risk Requests (such as requests to know categories of information): We may verify your identity using information you previously provided to us, such as your email address and account user name. Verification typically takes 1-2 business days. For Medium-Risk Requests (such as requests for specific pieces of information): We may require additional verification such as matching your request to recent transaction details or account activity. Verification typically takes 3-5 business days. For High-Risk Requests (such as deletion requests or requests involving sensitive information): We may require more robust verification, including government-issued ID verification or multi-factor authentication. Verification may take up to 10 business days. **Process Timeline:** We will acknowledge receipt of your request within 10 business days. We will provide a substantive response within 45 calendar days of verification. If we need additional time, we will notify you and may extend our response by an additional 45 days. If we cannot verify your identity using reasonable means, we will explain what additional information is needed and provide you with an opportunity to provide it. All verification procedures are provided at no cost to you.

You can also designate an authorized agent to make a CCPA rights request to us on your behalf. When you use an authorized agent to submit a CCPA rights request, you must provide the authorized agent with written permission to do so, and, in certain circumstances, we may ask you to verify your own identity directly with us. We may deny a request from an authorized agent who does not submit proof that they have been authorized by you to act on your behalf.

## **Selling Your Personal Information**

We do not sell personal information for direct monetary compensation. However, some of our data sharing practices described in this policy may be considered 'selling' under the California Consumer Privacy Act (CCPA). These may include sharing information with business partners for marketing purposes or with analytics providers who provide us with valuable insights in return. California residents have the right to opt out of such sales as described below. If we do, you are afforded the right to opt-out of any sale or sharing of your personal information for value and you may opt-out by clicking on the "Do Not Sell My Personal Information" link [here](#), the "Do Not Sell My Personal Information" link that is displayed on the Site home page, by emailing us at [dpo@sloan.com](mailto:dpo@sloan.com) or by calling us at the following toll-free number: 888-756-2612. Except as otherwise indicated, the information sharing that we do is so that we can provide you with the products and services that you have requested we provide to you.

## **Responding to California Consumer Privacy Requests**

When you make a CCPA rights request, we must first verify your identity using other non-sensitive personal information that we may have on file for you except when you exercise your right to opt out of the selling of your personal information. When you request to opt out of the selling of your personal information, we must honor your request even if you have not established an account with us. But for the other rights, in order for us to process your request, you must provide the information we request as part of the verification process, such as your contact information and an additional non-sensitive personal information identifier based on your relationship with us. Before we process your request, we will match these data points with data points we currently maintain to verify your identity and your relationship with us.

We also reserve the right not to respond to or to deny a request to know or a request to allow access to or deletion of your information or to limit your rights under certain circumstances (e.g. if the request poses an unreasonable risk, we are lawfully entitled to do so, we are lawfully entitled to maintain an archive copy of your information despite a request to delete, if it is necessary to detect security incidents or if the rights of another individual might be violated, or if the request requires that we or our vendor, user or partner undertake a search or provide an accessible format when the information that is the subject of the request does not lend itself to a search or does not lend itself to the format being requested by the individual making the request). In some instances, this may mean that we and our vendor(s), other(s) and business partners are able to retain your personal information even if you withdraw your consent or if a California resident consumer, professional, employee or job applicant, we and our vendor(s), other user(s) and business partner(s) can maintain an archive copy of your personal information on a backup system notwithstanding a request to delete your personal information. Moreover, we have the legal obligation not to transmit to you or others certain information deemed highly sensitive (assuming that we even have such information) but we should always be able to provide you with information about whether we have such highly sensitive information about you.

Unless we are designated as the Service Provider under the CCPA, please do not submit personal information requests to any of our vendors, users or business partners as they may not necessarily be required to respond to personal information requests that they may receive directly from our customer or clients. When you make a legitimate CCPA rights request, we will communicate that request to our appropriate Service Providers who are acting on our behalf so that they will similarly honor your request. On the other hand, if we are the designated Service Provider for any product or service that is being offered to you, please direct your personal information requests directly to the company or other organization that has retained us as its/their Service Provider.

## **Sharing Personal Information for Direct Marketing**

Sloan has adopted a policy of not sharing your personally identifiable information with third parties for their direct marketing purposes if you request that we do not do so ("Opt-Out Policy"). You may make such a request by clicking on the "Do Not Sell My Personal Information" link [here](#), the "Do Not Sell My Personal Information" link that is displayed on the Site home page, or by sending us an email

at [dpo@sloan.com](mailto:dpo@sloan.com). When contacting us, please indicate your name, address, email address, and what personally identifiable information you do not want us to share with third parties for their direct marketing purposes. Please note that there is no charge for controlling the sharing of your personally identifiable information or for processing this request.

## California's "Shine the Light" Law

If you are a California resident and have provided personal information to a business without an Opt-Out Policy, you may be entitled by law to request certain information regarding disclosures of personally-identifiable information made by such business to third parties for the third parties' direct marketing purposes during the immediately preceding calendar year ("Disclosure Request"). Such business is not required to respond to more than one Disclosure Request per customer each year, or to respond to requests made by means other than through the contact information designated by the business for such purposes. However, please note that due to Sloan's Opt-Out Policy described in the preceding paragraph, we are not obligated by law to provide you with the requested information.

If you are still interested in making a Disclosure Request, please contact us at [dpo@sloan.com](mailto:dpo@sloan.com). In the Disclosure Request, specify that you seek your "California Customer Choice Privacy Notice." Please allow thirty (30) days for a response, but note that Sloan is entitled by law to respond to your Disclosure Request by notifying you of your right to prevent the disclosure of personal information pursuant to our Opt-Out Policy.

### 15. Links

You may have the opportunity to follow links on the Sites to other sites that may be of interest to you. Sloan endeavors to only link to reputable organizations. Because other sites may not be hosted or controlled by Sloan, we are not responsible for the privacy practices of those sites or the content provided thereon. Therefore, the privacy policies with respect to other sites may differ from those applicable to the Sites. We encourage you to review the privacy policies of each other site. This Privacy Policy only applies to information collected and maintained by Sloan.

### 16. International Visitors

The Sites are hosted in the United States and are intended only for United States visitors. We do not solicit any personal data transmitted to us from others who are located in countries outside of the United States. If you are located in an EU member country, the United Kingdom, Iceland, Liechtenstein, Norway or Switzerland and you have sent us your personal data unsolicited, after we have completed our review of your communication, we will appropriately delete your communication, including any personal data that may be contained therein. European Union and United Kingdom Data Protection. When we process personal data of EU or UK residents, we comply with the General Data Protection Regulation (GDPR) and UK GDPR respectively.

Legal Basis for Processing - We may process personal data based on the following legal grounds:

- **Consent:** Where you have provided clear consent for specific processing activities
- **Contract:** Where processing is necessary to perform a contract with you
- **Legitimate Interests:** Where we have legitimate business interests that do not override your privacy rights
- **Legal Obligation:** Where processing is required by law

If you are an EU or UK resident, you have additional rights including:

- Right to access your personal data
- Right to rectification of inaccurate data-
- Right to erasure ('right to be forgotten')

- Right to restrict processing
- Right to data portability
- Right to object to processing
- Rights related to automated decision-making

To exercise these rights, please contact us at [dpo@sloan.com](mailto:dpo@sloan.com). You also have the right to lodge a complaint with your local data protection authority. For GDPR-related inquiries, you may contact our Data Protection Officer at [dpo@sloan.com](mailto:dpo@sloan.com).

International Data Transfers: When we transfer personal data outside the EU/UK, we ensure appropriate safeguards are in place, including Standard Contractual Clauses or adequacy decisions.

We may share, as described in this Privacy Policy, information with our affiliates and subsidiaries, and third parties. We may disclose information in response to legal process and lawful requests by public authorities in the United States and other countries, for the purposes of law enforcement and national security.

## **17. Contact Information and Privacy Inquiries**

For questions, concerns, or requests related to this Privacy Policy or your personal information, please contact us using the methods below:

Online: Use the 'Privacy Rights Request' form on our website.

Email: [dpo@sloan.com](mailto:dpo@sloan.com)

Mail: Attention Sloan Valve Company, Privacy Office, 10500 Seymour Avenue, Franklin Park, IL 60131.

Important Security Notice: Email communications may not be secure. When contacting us about privacy matters: - Do not include sensitive personal information (SSN, passwords, financial account numbers) in emails - For sensitive inquiries, please call us directly or use our secure online forms - We will never ask for sensitive personal information via email.

Response Times: - General inquiries: 5-7 business days - Privacy rights requests: 10 business days acknowledgment, 45 days response - Urgent security matters: 24-48 hours. We are committed to addressing your privacy concerns promptly and thoroughly. email correspondence to the Sites or Sloan.