



---

## PRIVACY POLICY

Effective Date: 1<sup>st</sup> January 2023

---

### SCOPE

This Privacy Policy (“Policy”) describes how Apex Tool Group, LLC, its subsidiaries and affiliates (collectively, “ATG,” “we,” or “us”) treats personal information that we collect offline and through our websites and other online platforms where this Policy is located (collectively, our “Platform”). This Policy does not apply to our collection of employment-related information.

This Platform is operated in the United States and intended for use by individuals who are located in the United States.

---

### NOTICE AT COLLECTION

We collect information from you and about you. Here are some examples of the information we may collect, how we may use it, how we may disclose it and whether we share it for cross-contextual advertising purposes (“sharing”). Below this Notice At Collection, you will find more detailed descriptions of how we may collect, use and disclose personal information.

We do not knowingly engage in the “sale” of personal information, as defined by relevant state laws.

- **Contact Information.** For example, we may collect your name, home address, telephone number and email address. We may also collect your mobile phone number.
  - **How We May Collect It :** Directly from you; passively; or from third parties.
  - **How We May Use It:** To provide our products and services; to customize your experience with us; to run and improve our Platform and business; to communicate with you; for marketing purposes; for security purposes; as otherwise permitted by law or as we may notify you; or as requested or directed by you.
  - **How We May Disclose It:** Internally; with our service providers; with our business partners; with third-parties for marketing purposes; with successors to all or part of our business; to comply with the law or protect ourselves; for other reasons we may describe to you; or as requested or directed by you.
  - **We may share this information with business partners such as social media sites, data aggregators, advertisers, media buying agencies and advertising networks. For more information about your right to opt-out, please click here .**
- **Financial information.** This may include your credit or debit card number or your checking or savings account number.
  - **How We May Collect It:** Directly from you.
  - **How We May Use It:** To provide our products and services; to run and improve our Platform and business; for security purposes; as otherwise permitted by law or as we may notify you; or as requested or directed by you.
  - **How We May Disclose It:** Internally; with our service providers; with successors to all or part of our business; to comply with the law or protect ourselves; for other reasons we may describe to you; or as requested or directed by you.



- **We Do Not Share This Information.**
- **Information You Submit or Post.** We may collect information when you send us a message through the “Contact Us” page or similar features on our Platform. We may also collect other information you submit through an online comment or when you contact our sales or support teams. We may collect personal information you include in a social media post.
  - **How We May Collect It:** Directly from you.
  - **How We May Use It:** To provide our products and services; to run and improve our Platform and business; to communicate with you; for security purposes; as otherwise permitted by law or as we may notify you; or as requested or directed by you.
  - **How We May Disclose It:** Internally; with our service providers; with successors to all or part of our business; to comply with the law or protect ourselves; for other reasons we may describe to you; or as requested or directed by you.
  - **We Do Not Share This Information.**
- **Business Information.** For example, we may collect your business contact information. We may also collect information about your employer and your job title.
  - **How We May Collect It:** Directly from you; passively; or from third parties.
  - **How We May Use It:** To provide our products and services; to customize your experience with us; to run and improve our Platform and business; to communicate with you; for marketing purposes; for security purposes; as otherwise permitted by law or as we may notify you; or as requested or directed by you.
  - **How We May Disclose It:** Internally; with our service providers; with our business partners; with third-parties for marketing purposes; with successors to all or part of our business; to comply with the law or protect ourselves; for other reasons we may describe to you; or as requested or directed by you.
  - **We may share this information with business partners such as social media sites, data aggregators, advertisers, media buying agencies and advertising networks. For more information about your right to opt-out, please click here .**
- **Demographic Information.** We may collect demographic information such as your birthdate, age, and zip code.
  - **How We May Collect It:** Directly from you; passively; or from third parties.
  - **How We May Use It:** To provide our products and services; to customize your experience with us; to run and improve our Platform and business; for marketing purposes; for security purposes; as otherwise permitted by law or as we may notify you; or as requested or directed by you.
  - **How We May Disclose It:** Internally; with our service providers; with our business partners; with third-parties for marketing purposes; with successors to all or part of our business; to comply with the law or protect ourselves; for other reasons we may describe to you; or as requested or directed by you.
  - **We may share this information with business partners such as social media sites, data aggregators, advertisers, media buying agencies and advertising networks. For more information about your right to opt-out, please click here .**
- **Account Information.** Certain portions of the Platform allow you to create a user account. In connection with that account, we may collect your username and password.
  - **How We May Collect It:** Directly from you.



- **How We May Use It:** To provide our products and services; to customize your experience with us; to run and improve our Platform and business; to communicate with you; for security purposes; as otherwise permitted by law or as we may notify you; or as requested or directed by you.
  - **How We May Disclose It:** Internally; with our service providers; successors to all or part of our business; to comply with the law or protect ourselves; for other reasons we may describe to you; or as requested or directed by you.
  - **We Do Not Share This Information.**
- **Commercial information.** We may collect personal information that could identify you and relates to the products or services in which you are interested, have purchased, or have considered or purchased. We may also collect personal information about your purchasing habits, or consuming history or tendencies
    - **How We May Collect It:** Directly from you; passively; or from third parties.
    - **How We May Use It:** To provide our products and services; to customize your experience with us; to run and improve our Platform and business; for marketing purposes; for security purposes; as otherwise permitted by law or as we may notify you; or as requested or directed by you.
    - **How We May Disclose It:** Internally; with our service providers; with our business partners; with third-parties for marketing purposes; with successors to all or part of our business; to comply with the law or protect ourselves; for other reasons we may describe to you; or as requested or directed by you.
    - **We may share this information with business partners such as social media sites, data aggregators, advertisers, media buying agencies and advertising networks. For more information about your right to opt-out, please click here .**
  - **Internet or other similar network activity.** This may include unique personal identifier, online identifier, IP address and location based on IP address, device identifier, browsing history, search history, and information regarding interaction with an Internet website, application, or advertisement. This may also include information about the browser you are using, what site you came from and what site you visit when you leave us or information regarding how you use the Platform. For example, we may collect information regarding what Platform features are useful or most frequently used.
    - **How We May Collect It:** Directly from you; passively; or from third parties.
    - **How We May Use It:** To provide our products and services; to customize your experience with us; to run and improve our Platform and business; for marketing purposes; for security purposes; as otherwise permitted by law or as we may notify you; or as requested or directed by you.
    - **How We May Disclose It:** Internally; with our service providers; with our business partners; with third-parties for marketing purposes; with successors to all or part of our business; to comply with the law or protect ourselves; for other reasons we may describe to you; or as requested or directed by you.
    - **We may share this information with business partners such as social media sites, data aggregators, advertisers, media buying agencies and advertising networks. For more information about your right to opt-out, please click here .**
  - **Inferences drawn from personal information.** This may include a profile relating to your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitude.
    - **How We May Collect It:** Directly from you; passively; or from third parties.



- **How We May Use It:** To provide our products and services; to customize your experience with us; to run and improve our Platform and business; for marketing purposes; for security purposes; as otherwise permitted by law or as we may notify you; or as requested or directed by you.
- **How We May Disclose It:** Internally; with our service providers; with our business partners; with third-parties for marketing purposes; with successors to all or part of our business; to comply with the law or protect ourselves; for other reasons we may describe to you; or as requested or directed by you.
- **We may share this information with business partners such as social media sites, data aggregators, advertisers, media buying agencies and advertising networks. For more information about your right to opt-out, please click here .**

**Our Personal Information Retention Criteria:** The California Consumer Privacy Act, as amended by the California Privacy Rights Act (collectively, “CCPA”) requires that we disclose the criteria we use to determine how long we will retain each category of personal information we collect. Oftentimes, our records contain several of these categories of personal information combined together and therefore we consider, on a case-by-case basis, a number of factors to assess how long personal information is retained. These factors include what personal information is reasonably necessary to (i) provide our products and services or administer our relationship with an individual; (ii) protect our business, employees, organization and others; (iii) fulfill our legal and regulatory obligations; and (iv) investigate and address issues which may include safety concerns, potential security incidents or policy violations.

---

## HOW WE MAY COLLECT YOUR PERSONAL INFORMATION

We may collect your personal information in different ways. Below, you will find additional details and examples regarding how we may collect your personal information.

- **Directly From You.** For example:
  - Register for an account.
  - Purchase our products and services.
  - Submit an inquiry to us.
  - Sign-up for one of our events.
  - Request a product demonstration.
  - Download our product materials.
  - Complete an online form.
  - Contact our sales or support team.
  - Interact with our social media pages.
  - Otherwise interact with us.

We may have service providers collect personal information from you on our behalf.

- **Passively.** For example, when you visit and navigate our Platform on any device. We may also collect information about users over time and across different websites and devices when you use the Platform. We may use tools such as analytics and cookies, including cookies run by third parties, to collect this information.



- **From Third Parties.** We may receive information about you from other sources. For example, this may include receiving information from:
  - Our business partners, including online advertising networks and analytics vendors
  - Social media sites, including Facebook, Twitter, YouTube, Pinterest, Snapchat and Instagram.
  - Your contacts who provide your information to us because they think you may be interested in our products and services or they want to share a product or service with you.
  - Companies that provide information to supplement what we already know about you, including data aggregators. Certain third-parties might link your name or email address to other information they have collected. That might include online usage information.

---

## HOW WE MAY USE YOUR PERSONAL INFORMATION

Here are more details and examples regarding how we may use your personal information:

- **To Provide Our Products and Services.** This includes fulfilling your requests for our products and services.
- **To Customize Your Experience With Us.** This may include displaying products that may be of interest to you.
- **To Run and Improve Our Platform and Business.** We may use your information to make our Platform and business better. We may also use your information to provide you with information about our business. This includes using your information for accounting, record keeping, backup, and other administrative purposes.
- **To Communicate With You.** We may communicate with you about your account or our relationship. We may also contact you about this Policy or our Platform terms and conditions. This may also include responding to your requests, questions or feedback or providing customer support.
- **For Marketing Purposes.** We may provide you with information about our company and our business initiatives. This includes using your information to personalize your experience on our Platform and with our products. We may also engage in online behavioral advertising and retargeting. For more information about your choices related to these communications, see the **Cookies and Electronic Communications** section below.
- **For Security Purposes.** This could include protecting our company and consumers who use our products and services. It may also include protecting our Platform.
- **As Otherwise Permitted By Law or As We May Notify You.**
- **As Requested or Directed By You.**



---

## HOW WE MAY DISCLOSE YOUR PERSONAL INFORMATION

Here are more details and examples regarding how we may disclose your personal information:

- **Internally.** We may share your information with our parent, subsidiary, and affiliate entities.
- **With Our Service Providers.** We may share your information with third-parties who perform services on our behalf. For example, this may include companies that send emails on our behalf or help us run our Platform. This may also include advertising and analytics service providers.
- **With Our Business Partners.** For example, this may include social media sites, data aggregators, advertisers, media buying agencies and advertising networks.
- **With Third-Parties for Marketing Purposes.** This may include third-parties in whose products or services we believe you may be interested. These third-parties may also share your information with others. These third-parties may use your information for their own marketing purposes or the marketing purposes of others. This may include the delivery of interest-based advertising.
- **With Any Successors to All or Part of Our Business.** For example, if we merge with, acquires or is acquired, or sells part of its business to another entity. This may include an asset sale, corporate reorganization or other change of control.
- **To Comply With the Law or To Protect Ourselves.** For example, this could include responding to a court order or subpoena. It could also include sharing information if a government agency or investigatory body requests. We might share information when we are investigating a potential fraud.
- **For Other Reasons We May Describe to You.**
- **As Requested or Directed By You.**

---

## YOUR PRIVACY RIGHTS

Residents of California may have the rights listed below with respect to the Personal Information that we maintain about you. We may take steps to verify your identity, as permitted or required under applicable law, before we process your request. Verification may include asking you to provide information about yourself that we can match against information already in our possession.

**Please note that we do not knowingly sell or share the personal information of consumers under 16 years.**

- **Notice.** This means that you can request that we disclose what personal information we have collected about you, including the categories of personal information, the categories of sources from which the personal information is



collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom we have disclosed personal information, and the specific pieces of personal information we have collected about the consumer.

- **Deletion.** This means that you can request that we delete personal information about you which we have collected from you.
- **Correction.** This means that you can request that we correct inaccurate personal information that we maintain about you.
- **Opt-Out of Sale of Personal Information.** This means that you can request that we refrain from selling your personal information.
- **Opt-Out of Sharing of Personal Information.** You may have the right to opt out of sharing of personal information with third parties for cross-contextual marketing purposes. In order to fully opt-out of sharing, you will need to both submit a sharing opt-out request and follow the instructions in the Cookies and Electronic Communications section to opt-out of cookies. **Your choice to opt-out of cookies is specific to the device, website and browser you are using at the time and you may need to do this again if you clear your cookies or use a different device, website or browser.**
- **Right to Non-Discrimination.** This means that we are prohibited from discriminating against you if you exercise your rights under applicable law.

If you wish to exercise your rights under this section, you can contact us at [DataPrivacy@ApexToolGroup.com](mailto:DataPrivacy@ApexToolGroup.com). Please include your name, telephone number and the email address that you provided to us and indicate you are making a “Privacy Rights” request. If we deny your rights request and you would like to appeal, you may contact us at [DataPrivacy@ApexToolGroup.com](mailto:DataPrivacy@ApexToolGroup.com) and indicate that you are making a “Privacy Rights Appeal.”

**Agents.** Agents that you have authorized to act on your behalf may also submit privacy requests as instructed above. The agent must also provide evidence that they have your written permission to submit a request on your behalf. If we are unable to verify the authenticity of a request, we may ask you for more information or may deny the request.

**California Shine the Light Inquiries.** California residents have the right to ask us one time each year if we have shared personal information with third parties for their direct marketing purposes. To make a request, please send us an email at [DataPrivacy@ApexToolGroup.com](mailto:DataPrivacy@ApexToolGroup.com). Indicate in your email or letter that you are a California resident making a “California Shine the Light” inquiry.

**Nevada Opt-Out Inquiries.** If you are a Nevada resident, under Privacy and Security of Personal Information Chapter of the Nevada Revised Statutes Section 603A (“603A”), you have the right to submit a verified request to us, directing us not to make any sale of certain “personal information” as defined under this law that we have collected or will collect about you. We do not currently engage in the “sale” (as defined by Nevada law) of personal information. That stated, Nevada residents who wish to exercise their rights under this section can email us at [DataPrivacy@ApexToolGroup.com](mailto:DataPrivacy@ApexToolGroup.com). Please indicate you are a Nevada resident making a “Nevada Opt-Out” request, and include your name, telephone number and the email address you used to access our Platform.

---

## CHILDREN UNDER 18

The Platform where this Policy is located is meant for adults. We do not knowingly collect personally identifiable data from persons under the age of 18 and strive to comply with the provisions of COPPA (The Children’s Online Privacy Protection Act). If you are a parent or legal guardian and think your child under 18 has provided us with information, please contact us at [DataPrivacy@ApexToolGroup.com](mailto:DataPrivacy@ApexToolGroup.com). You can also write to us at the address listed at the end of this website Policy. Please



mark your inquiries “COPPA Information Request.” Parents, you can learn more about how to protect children’s privacy on-line [here](#).

---

## COOKIES AND ELECTRONIC COMMUNICATIONS

You have certain choices about how we collect, use and disclose your information in connection with our use of cookies and our provision of electronic communications. Certain choices you make are device, website and browser specific.

### Cookies & Other Tracking Technologies:

- **Cookies:** You can adjust your browser to control cookies to require your affirmative acceptance for new cookies, automatically reject cookies and/or delete or disable existing cookies. How you do so depends on the type of cookie and the browser that you are using. For more information on how to control browser cookies, [click here](#). If information about your browser is not available through this page, please search your browser for instructions about how to opt-out of cookie collection. **Your choice to opt-out of cookies is specific to the device, website and browser you are using at the time and you may need to do this again if you clear your cookies or use a different device, website or browser.**
- **Flash Cookies:** You may need to take an additional action to manage flash cookies, which you can learn more about [here](#). Why? Because flash cookies cannot be controlled through your browser settings.
- **Google Analytics:** We may use Google Analytics on our Platform to help us understand how you use our Platform. You can learn about how to opt-out of Google Analytics [here](#).
- Note that deleting or blocking cookies may impact your experience on our website, as some features may not be available. Certain options you select are browser and device specific.

**Our Do Not Track Policy:** Some browsers have “do not track” features that allow you to tell a website not to track you. These features are not all uniform. We do not currently respond to “do not track” signals. If you block cookies, certain features on our sites may not work. If you block or reject cookies, not all of the tracking described here will stop.

**Marketing Communications:** You can opt out of receiving our marketing communications, which we may send by email or text message. Note that you will still receive transactional messages from us, including information about your account and responses to your inquiries.

---

## SECURITY

The Internet is not 100% secure. We cannot promise that your use of our Platform will be completely safe. We encourage you to use caution when using the Internet. We use reasonable means to safeguard personal information under our control. A username and a password may be needed to access certain areas of our Platform. It is your responsibility to protect your username and password.

---

## STORAGE OF INFORMATION

Information we maintain may be stored in or outside of the United States. If you live outside of the United States, you understand and agree that we may transfer your personal information to the United States. This Platform is intended for use in the United States and is subject to the laws of the United States, which may not provide the same level of protections as those in your own country.





---

## LINKS

Our Platform may contain links to other third-party sites that are not governed by this Policy. If you click on a link to a third-party site, you will be taken to a site we do not control. We are not responsible for these third party sites or their privacy practices. We suggest that you read the privacy policies of those sites carefully.

---

## HOW TO CONTACT US

If you have any questions, comments or concerns with respect to our privacy practices or this Policy, or wish to update your information, please feel free to contact us at [DataPrivacy@ApexToolGroup.com](mailto:DataPrivacy@ApexToolGroup.com) or by telephone at 980-441-4068. You may also write to us at the following address:

Apex Tool Group, LLC,  
Attn: Chief Compliance Officer  
1000 Lufkin Road  
Apex, NC 27539  
Re: ATG Privacy Policy

---

## CHANGES IN POLICY

From time to time, we may change our Policy. We will notify you of any material changes to our Policy as required by law. We will also post an updated copy on our Platform. Please check our Platform periodically for updates.

© Apex Tool Group, LLC. 2023.