

[WWW.HAARTZ.COM](http://www.haartz.com) PRIVACY POLICY

Last updated: January 2021

The Haartz Corporation and its global subsidiaries (“Haartz”) have created this Privacy Policy in compliance with applicable law and to demonstrate our firm commitment to privacy. This Privacy Policy discloses our information gathering and dissemination practices for the Haartz website, www.haartz.com (the “Site”). The terms “we” and “our” refer to The Haartz Corporation and its global subsidiaries.

GENERAL DISCLOSURE

This Site is hosted in the United States. If you are visiting this Site from outside of the United States, please note that by providing your information it is being transferred to, stored or processed in the United States, where our data center and servers are located and operated. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country of residence. By using our Site, you understand that your information will be transferred to our data center and servers in the United States and to third parties with whom we may share your personal information. If you are visiting this Site from outside the United States and do not wish to allow the transfer of your personal information to the United States, you should not use this Site and opt-out of the use of cookies.

We take your privacy and the protection of your personal information seriously. We will only store, process, and disclose your personal information where we have your consent or a legitimate interest and in accordance with applicable law. We will make it clear when we collect personal information and will explain what we intend to do with it. We do our best to protect your privacy through the appropriate use of information security measures.

COLLECTION AND USE OF PERSONAL INFORMATION

We (and our affiliates and authorized service providers) may collect, store, and use:

1. information about your visits to and use of this Site;
2. information about any transactions carried out between you and us;
3. any information you provide to us if you correspond with us;
4. if you create or attempt to create a supplier/customer relationship with us, we may ask you for your name, e-mail address, street address, or other personal/corporate information. You may, however, visit the Site without providing that information.

We also may collect information about your computer or mobile device and your visits to this Site, such as your IP address, geographical location, browser type, referral source, length of visit and number of page views. We may use this information in the administration of this Site, to improve the Site’s usability, to provide better service, to send you newsletters, legal updates, marketing communications, and other information that may be of interest to you. We also use outside services such as Google Analytics to gather data about our Site visitors. Except where you log in using an account we provide or fill out an online form, the information from your site visit does not allow us to identify you (or your household) specifically.

We do not allow third-parties to collect personally identifiable data about your online or mobile activities over time and across different web sites or mobile devices when you use the Site.

We also will not sell your personal information. We rely on the following legal grounds to process your personal information, namely:

Performance of a contract—We may need to collect and use your personal information to enter into a contract or to perform a contract that you or your company has with us.

Consent—Where required by applicable law, we will rely on your consent for collecting your personal information.

Legitimate interests—We may use your personal information for our legitimate interests to improve our services. Consistent with our legitimate interests and any choices that we offer or consents that may be required under applicable law, we may use technical information as described in this Privacy Policy and use personal information for our marketing purposes.

COOKIES POLICY

Our Site uses first- and third-party cookies for technical, analytical, and advertising purposes. “First-party cookies” refer to cookies that are set by our Site, and we are the only ones with access to this information. On the other hand, “third party cookies” or requests allow other third parties to have access to the information collected. Not all cookies are necessary to navigate this Site. Cookies used for This is more comprehensive than what we actually do. analytical and advertising purposes, such as site analytics and advertising cookies (non-essential cookies) are not necessary to navigate our Site. You have the choice not to accept or delete them anytime and carry on browsing normally.

What are cookies and why do we use them?

Cookies are files that are downloaded on your computer or mobile device when you visit certain websites. Cookies allow a website, for instance, to identify a user session, recall your preferences (*e.g.* language), or gather information about your browsing habits on our site. We use essential cookies for our legitimate interest in facilitating your access to and use of the Site, and we ask your consent for using advertising and analytics cookies (non-essential cookies) so we can measure how you interact with the Site content. However, you can withdraw your consent at any time.

We may send a cookie which may be stored by your browser on your computer’s hard drive. We use this information for the following purposes:

- Assisting you in navigation on the Site
- Improve the functionality of the Site
- System administration, including site security
- Reporting information for research purposes
- Assisting with our promotional and marketing efforts.
- Recording your privacy preferences.

We also may use “clear gif” pixels in HTML-based emails sent to our users to track which emails are opened by recipients. We may use the information we obtain from the cookie in the administration of this Site, to improve the Site’s usability and for marketing purposes. We may also use that information to recognize your computer or mobile device on a return visit our Site and to personalize our Site for you.

Cookies and information captured through this Site are stored on your computer for a certain retention period and read by us on your return visits using the same browser and computer; however, you can eliminate these cookies any time before the cookie expiration date (see instructions below).

How to Restrict Cookies and Control Privacy Settings

You can adjust the settings in your browser in order to restrict or block cookies that are set by the services or information you access on our Site (or any other website on the Internet). Your browser may include information on how to adjust your settings. Alternatively, you may visit www.allaboutcookies.org to obtain comprehensive general information about cookies and how to adjust the cookie settings on various browsers. This site also explains how to delete cookies from your computer.

You can control and delete these cookies through your browser settings through the following links:

- [Google Chrome](#)
- [Mozilla Firefox](#)
- [Safari](#)
- [Opera](#)
- [Microsoft Internet Explorer](#)
- [Safari for iOS \(iPhone and iPad\)](#)
- [Chrome for Android](#)
- [Windows Phone](#)

To prevent Google Analytics from recognizing you on return visits, you can use the following cookie management and disposal tool from Google Analytics by downloading and installing the browser plug-in from the following link: <http://tools.google.com/dlpage/gaoptout>.

Please be aware that restricting cookies may impact the functionality of the Site. Most browsers allow you to refuse to accept cookies. This will, however, impact the usability of many websites, including this Site.

LINKING SITES

The Site contains links to other sites. Haartz is not responsible for the privacy practices or the content of such other websites, including any sites that may indicate a special relationship or partnership with us (such as co-branded pages or “powered by” or “in cooperation with” relationships). We do not share information we gather with other websites or any other entities or individuals unless such sharing is approved in advance by you. Other linked websites, however, may collect personal information from you that is not subject to our control. To ensure the protection of your privacy, always review the privacy policy of the websites you may visit by linking from the Site. Please note that this Privacy Policy applies only to www.haartz.com, and not to other companies’ or organizations’ websites to which we link. For instance, information collected through Google Analytics is shared with Google and its partners who may combine it with other information you’ve provided to them or they’ve collected from your use of their services.

SOCIAL MEDIA

We may collect information from other sources, such as social media platforms that may share information about how you interact with our social media content. We do not control how your personal information is collected, stored or used by such third-party social media platforms or websites, or to whom it is disclosed. You should review the privacy policies and settings on any social networking platform or website that you subscribe to so that you understand the information they may be collecting and sharing. If you do not want your social networking sites to share information about you,

you must contact that particular social media platform website and determine whether it gives you the opportunity to opt-out of sharing such information. Haartz is not responsible for how these third-party social media platforms or websites may use information collected from or about you.

SECURITY

Haartz employs security measures utilizing industry-standard technology to protect the loss, misuse or alteration of personal information that you disclose through the Site. Personal information is stored in a secured database and always sent via an encrypted Internet or mobile channel. Further public disclosure here of our security measures could aid those who might attempt to circumvent those security measures. If you have additional questions regarding security, please feel free to contact us directly at privacyinquiry@haartz.com.

DISCLOSURE OF PERSONAL INFORMATION

Haartz may disclose personal information when we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be violating any agreement with Haartz, or may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other Site users, or anyone else that could be harmed by such activities. We may disclose information in response to a subpoena, search warrant, in connection with judicial proceedings, or pursuant to court orders, legal process, or other law enforcement measures. Haartz may disclose or access personal information when we believe in good faith that the law requires it, to establish our legal rights or to defend against legal claims, and for administrative and other purposes that we deem necessary to maintain, service and improve our products and services.

RESPONSE TO "DO NOT TRACK" SIGNALS

Some Internet browsers include the ability to transmit "Do Not Track" signals. Since uniform standards for "Do Not Track" signals have not yet been adopted, Haartz does not process or respond to "Do Not Track" signals.

CHILDREN'S ONLINE PRIVACY PROTECTION ACT (COPPA) COMPLIANCE AND RELATED INFORMATION

The U.S. federal Children's Online Privacy and Protection Act ("COPPA") regulates online collection of information from persons under the age of 13. It is our policy to refrain from knowingly collecting or maintaining personally identifiable data relating to any person under the age of 18. If you are under the age of 18, please do not supply any personally identifiable data through the Site. If you are under the age of 18 and have already provided personally identifiable data through the Site, please have your parent or guardian contact us immediately at privacyinquiry@haartz.com so that we can remove such information from our files.

LIMITATIONS

We only collect the personal information necessary to fulfill the purposes identified to you prior to or at the time of collection, or any other reasonable and legitimate purposes or as required by applicable law. We do not use or disclose your personal information, except for the purposes for which it was collected, or new purposes to which you have consented, or as required or otherwise permitted by applicable law. We do not, as a condition of providing services to you or on your behalf, or as an administrative or management requirement, require consent to the collection, use or disclosure of personal information

beyond that reasonably required for such purposes or to comply with our obligations under applicable law.

RETENTION OF PERSONAL INFORMATION

We may keep a record of your personal information, including correspondence or comments, in the applicable file specific to you. We will utilize, disclose, or retain your personal information for as long as necessary to fulfill the purposes for which it was collected and for legal or business requirements. When personal information is retained to make a decision about you, we will retain such information for the period required in order to comply with our internal compliance and data retention policies.

YOUR CHOICES AND ACCESS TO YOUR PERSONAL INFORMATION

Where applicable law provides, and subject to the exceptions and limitations provided by that law, we will make available to you any specific personal information about you that we have collected, utilized or disclosed, upon your written request. We will make such information available to you in a form that is generally understandable, including explaining any abbreviations or codes and using an alternative format, if required. Simply send your request for access via e-mail to privacyinquiry@haartz.com. We may ask for additional information to determine the law applicable to your request.

If you no longer wish to receive marketing communications from us, you can let us know by sending an email to privacyinquiry@haartz.com. Each of our marketing emails also contains an unsubscribe link so that you may unsubscribe from the applicable list or lists.

YOUR INDIVIDUAL RIGHTS IN THE EUROPEAN UNION, THE EUROPEAN ECONOMIC AREA, THE UNITED KINGDOM, AND SWITZERLAND

For residents of the European Union, the European Economic Area, the United Kingdom, and Switzerland, you may be entitled to ask us for a copy of your information, to correct it, erase or restrict its processing, or ask us to transfer some of this information to other organizations under the General Data Protection Rule (GDPR). You may also have the right to object to some processing activities and, where we have asked for your consent to process your information, to withdraw this consent. These rights may be limited in some situations, for example, where we can demonstrate that we have a legal requirement to process your information. In some instances, this may mean that we are able to retain your information even if you withdraw your consent.

We hope we can satisfy any queries you may have about the way we process your data. If you have any concerns about how we process your data, or would like to opt-out of receiving marketing communications, please contact us at privacyinquiry@haartz.com.

For residents of the European Union, the European Economic Area, the United Kingdom, and Switzerland in the event you have unresolved concerns, you also have the right to complain to a data protection authority.

YOUR RIGHTS IF YOU ARE A CALIFORNIA RESIDENT

If you are a California consumer, the California Consumer Privacy Act (“CCPA”) gives you certain rights with regard to specified information that identifies you or your household (“Personal Information”). This Privacy Notice is provided so that you can understand at or before the point of collection what we are collecting and why.

Information We Collect. Personal Information may be collected directly from you, from third parties, or automatically when Haartz’s services are used. Below is a description of the categories of Personal Information we collect and the sources from which the Personal Information was collected.

Job Applicants. If you apply for a job with Haartz, various information may be collected through applications and various employment forms, HRIS, third party vendors (background screenings and insurance providers, retirement plan bank/custodians, etc.), benefit election forms, beneficiary forms, etc. Such information may include the following: names, addresses, phone numbers, social security numbers, copies of governmental ID including driver’s license numbers, date of birth, pay/benefit deduction data, personal banking information, dependent and beneficiary personal data including social security numbers, emergency contact information, tax withholding info, court ordered wage attachment, qualified domestic relations orders, medical/family/personal leave of absence data, marriage and death certificates, and other information that you voluntarily provide or that government agencies provide about you or on your behalf.

Customers. If you are a customer of Haartz, information may be collected directly from you include the following: names, addresses, credit history, and banking information

Marketing. Haartz may obtain the following information automatically from you upon subscribing to Haartz’s website or other referral sources to send you communications for marketing purposes that are relevant to you: name, title, company, department, addresses, phone numbers, email addresses, and company website address.

Payment. Haartz may obtain information from vendors or customer files to obtain payment or to pay vendors.

Communications. If you contact Haartz for any purpose, Haartz will record your name, contact details, the content and purpose of your contact, the date and time of your contact, and Haartz’s reply or action taken in response to your contact.

Events. Haartz may obtain the following information collected upon your registration for an event sponsored by Haartz: name, address, phone number, title, company, social media handle, and email address. The particulars of the data collected in connection with events will be reflected in the registration forms you fill out.

Your Rights with Regard to Your Personal Information. As a California consumer, you have the following rights, in certain circumstances, in relation to your Personal Information:

1. The right to understand the collection and use of your Personal Information.
2. The right to request that Personal Information be erased.
3. The right to obtain a copy of your data in a reasonably useful electronic form (in certain specific circumstances).
4. The right to opt-out of the sale of your Personal Information.

A summary of each right and how an individual can take steps to exercise it is set out below.

Right to Understand the Collection and Use of your Personal Information (“Right to Know”). Subject to any applicable legal limitations, you have the right to request, and receive information on:

1. The categories of Personal Information we have collected about you.
2. The categories of sources from which the Personal Information is collected.

3. The business or commercial purpose for collecting or selling Personal Information (if applicable).
4. The categories of third parties with whom we share Personal Information.
5. The specific pieces of Personal Information we have collected about you.

Right to Request the Deletion of Your Personal Information (“Right to Delete”). You may request that we delete your Personal Information. We will do so, except in the following circumstances:

1. Complete the transaction for which the Personal Information was collected, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
3. Debug to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code.
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, if you have provided informed consent.
7. Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Otherwise use your Personal Information, internally, in a lawful manner that is compatible with the context in which you provided the information.

These rights do not extend to anonymized or aggregated information that can no longer be connected to you personally.

Your Right to Access and Data Portability (“Right to Data Portability”). Subject to any legal limitations on our ability to do so, where we receive a verifiable request from you, you are entitled to a copy of the Personal Information that we have collected on you that, to the extent technically feasible, would allow you to transmit that data to another entity without undue hindrance. In addition, we may provide Personal Information to you at any time, but we are not required to provide Personal Information to you more than twice in a 12-month period.

Right to Opt-Out of the Sale of your Personal Information. Haartz does not sell the Personal Information of California customers and has not done so in the past twelve (12) months.

Rights of Minors. Our website is not directed to persons under the age of 13, and we do not knowingly store personal information of any kind relating to such persons. If you are the parent or guardian of a minor and believe that minor’s personal information has been collected, please contact us so that we may delete it.

Right to Not Receive Discriminatory Treatment. You have the right not to receive discriminatory treatment by Haartz for the exercise of the privacy rights conferred by the CCPA.

Financial Incentives. Haartz does not offer financial incentives to consumers based upon the retention of a consumer's personal information.

Exercising your rights. If you wish to exercise any of your rights under the CCPA, please contact us at privacyinquiry@haartz.com

We may require that you provide sufficient information to verify your identity before we provide information about the existence, use, or disclosure of your personal information in our possession, as well as your requests under the CCPA and our responses. Any personal information collected in this process shall be used only for the purposes described above.

Your rights may be exercised free of charge, except where requests are manifestly unfounded or excessive, in particular, if they are of an abusive or repetitive character. Under such circumstances, we may charge a reasonable fee (which we will specify in advance) or may refuse to act on the request. We will make every reasonable effort to respond to any of your written requests within the periods stated by California law, and if the law states no applicable period, within a reasonable amount of time. We expect to provide access without charge as a general matter. However, we reserve the right to collect a reasonable charge when you request the transcription, reproduction, or transmission of such information. We will notify you, following your request for transcription, reproduction, or transmission, of the appropriate amount that will be charged. You will then have the opportunity to withdraw your request.

PRIVACY POLICY CONTACTS

Personal information is generally located at our offices in the United States. A list of affiliates to which this Privacy Policy applies is available upon request. Please direct all questions, inquiries, or complaints regarding personal information or this Privacy Policy to Haartz as follows:

The Haartz Corporation

87 Hayward Rd.

Acton, MA 01720 USA

privacyinquiry@haartz.com

(978) 264-2600

CHANGES TO THE PRIVACY POLICY

This Privacy Policy may be revised from time to time as we add new features and services, as laws change, and as industry privacy and security best practices evolve. We display an effective date on this Privacy Policy at the top of this Privacy Policy so that it will be easier for you to know when there has been a change. Changes will apply to information collected after the change is effective. Please check this Privacy Policy periodically for changes. Small changes or changes that do not significantly affect individual privacy interests may be made at any time and without prior notice. Your use of the Site constitutes acceptance of the provisions of this Privacy Policy and your continued usage after such changes are posted constitutes acceptance of each revised Privacy Policy. If you do not agree to the terms of this Privacy Policy or any revised Privacy Policy, please exit the Site immediately.