

This *Buckles-Smith Electric* (“Company”) Privacy Policy covers the collection, use, and disclosure of personal information that may be collected by the Company and companies that we own or control (“Affiliates”) anytime you interact with the Company, such as when you visit our website, when you purchase the Company’s products and services online or at our locations, when you call our sales or support associates, or when you apply for employment. Please take a moment to carefully read the following to learn more about our information practices, including what type of information is gathered, how the information is used and for what purposes, to whom we disclose the information, and how we safeguard your personal information. Your privacy is a priority at the Company, and we go to great lengths to protect it.

### **Reasons the Company Collects Personal Information**

We collect your personal information because it helps us deliver a superior level of customer service. It enables us to give you convenient access to our products and services and focus on categories of greatest interest to you. In addition, your personal information helps us keep you posted on the latest product announcements, special offers, and events that you might like to hear about.

If you do not want the Company to keep you up to date with our news and the latest information on products and services, click <http://www.salesmanagementplus.com/Subscriptions/Identify.aspx?Page=BucklesSmith> and update your personal contact information and preferences.

### **Information the Company Collects and How the Information May be Used**

There are a number of situations in which your personal information may help us give you better products. For example:

We may ask for your personal information when you’re talking with our sales department or completing online forms.

Our website allows you to create a “Buckles-Smith Electric Contact ID” based on your personal information. This convenient service saves you time and allows for easier use of our web services. In order to create your Buckles-Smith Electric Contact ID you will need to create a personal profile by providing your name, phone number, email address, and in some cases your mailing address or a credit card number. You can use your unique personal Buckles-Smith Electric Contact ID when performing various activities relating to our website and the products and services you purchase from the Company.

When you interact with the Company, we may collect personal information relevant to the situation, such as your name, mailing address, phone number, email address, and contact preferences; your credit card information and information about the Company products you own, such as their serial numbers and date of purchase; and information relating to a support or service issue.

We also collect information for market research purposes — such as your occupation and where you use your Company products—to gain a better understanding of our customers and thus provide more valuable service.

We collect information regarding customer activities on our websites. This helps us determine how to best provide useful information to customers and understand which parts of our websites, products, and Internet services are of most interest to them.

We may use personal information to provide products that you have requested as well as for auditing, research, and analysis to improve our products.

This information may be shared with third parties or in special circumstances as described elsewhere in this policy.

### **Publicly Displayed Information is Public**

If you use a bulletin board or chat feature on our website you should be aware that any information you share is visible to other users. Personally identifiable information you submit to these forums can be read, collected, or used by other individuals to send you unsolicited messages. The Company is not responsible for the personally identifiable information you choose to submit in these forums. For example, if you choose to make previously

nonpublic information available by enabling certain user features, the Company will collect that information from your interaction and the information will become publicly available.

#### **When the Company Discloses Your Information**

The Company takes your privacy very seriously. The Company does not sell or rent your contact information to other marketers.

To help us provide superior service, your personal information may be shared with legal entities within our corporate group who will take steps to safeguard it in accordance with our privacy policy.

There are times when it may be advantageous for the Company to make certain personal information about you available to companies that the Company has a strategic relationship with or that perform work for the Company to provide products and services to you on our behalf. These companies may help us process information, extend credit, fulfill customer orders, deliver products to you, manage and enhance customer data, provide customer service, assess your interest in our products and services, or conduct customer research or satisfaction surveys. In such situations, these companies are prohibited from using your personal information for any unauthorized purposes and are also obligated to protect your information in accordance with the Company's policies, unless we inform you otherwise at the time of collection. Without such information being made available, it would be difficult for you to purchase products, have products delivered to you, receive customer service, provide us feedback to improve our products and services, or access certain services, offers, and content on our website.

The Company may take the personal information we receive from individuals responding to our customer surveys and combine (or aggregate) it with the responses of our other customers to create broader, generic responses to the survey questions (such as gender, age, residence, hobbies, education, employment, industry sector, or other demographic information). The Company then uses the aggregated information to improve the quality of its services, and to develop new services and products. This aggregated nonpersonal identifying information may be shared with third parties.

We also reserve the right to disclose your personal information for any reason if, at our sole discretion, we believe that it is reasonable to do so, including credit agencies, collection agencies, merchant database agencies, law enforcement, litigation or to satisfy laws, such as the Electronic Communications Privacy Act, the Child Online Privacy Act, regulations, or governmental or legal requests for such information. We may also disclose personal information that is necessary to identify, contact, or bring legal action against someone who may be violating our contracts, policies and procedures. Finally, we may disclose information about you if we determine that for national security, law enforcement, or other issues of public importance, disclosure is necessary.

#### **How the Company Protects Your Personal Information**

The Company takes precautions—including administrative, technical, and physical measures—to safeguard your personal information against loss, theft, and misuse, as well as unauthorized access, disclosure, alteration, and destruction.

You can help us by also taking precautions to protect your personal data when you are on the Internet. Change your passwords often using a combination of letters and numbers, and make sure you use a secure web browser.

While we make every effort to ensure the integrity and security of our network and systems, we cannot guarantee that our security measures will prevent third-party "hackers" from illegally obtaining your personal information.

#### **Integrity of Your Personal Information**

The Company has safeguards in place to keep your personal information accurate, complete, and up to date for the purposes for which it is used. You always have the right to access and correct the personal information you have provided and you can ensure that your contact information and preferences are accurate, complete, and up to date by checking your profile at <http://www.buckles-smith.com/>. In addition, you can request a copy of your personal information and your interactions with our sales and support agents by contacting us via email at [marketing@buckles-smith.com](mailto:marketing@buckles-smith.com).

#### **Cookies and Other Technologies**

As is standard practice on many corporate websites, our website uses “cookies” and other technologies to help us understand which parts of our websites are the most popular, where our visitors are going, and how much time they spend there. Cookies and other technologies are used to make sure that our online advertising is bringing customers to our products and services. We use cookies and other technologies to study traffic patterns on our website in order to make your experience even more rewarding and also to study the effectiveness of our customer communications. Lastly, we use cookies to customize your experience and provide greater convenience each time you interact with us.

If, however, you prefer not to enable cookies, please go to <http://www.buckles-smith.com/> and follow the steps to disable cookies. Please note that certain features of our website will not be available once cookies are disabled.

As is true of most websites, we gather certain information automatically and store it in log files. This information includes Internet Protocol (IP) addresses, browser type, Internet Service Provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data. We use this information, which does not identify individual users, to analyze trends, to administer the site, to track users’ movements around the site, and to gather demographic information about our userbase as a whole. The Company will not use the information collected to market directly to that person.

In some of our email messages, we use a “click-through URL” linked to content on our website. When customers click one of these URLs, they pass through our web server before arriving at the destination web page. We track this click-through data to help us determine interest in particular topics and measure the effectiveness of our customer communications. If you prefer not to be tracked, simply avoid clicking text or graphic links in the email.

In addition, we use pixel tags—tiny graphic images—to tell us what parts of our website customers visited or to measure the effectiveness of searches customers perform on our site. Pixel tags also enable us to send email messages in a format that customers can read, and they tell us whether emails have been opened to ensure that we’re sending messages that are of interest to our customers. We may use this information to reduce or eliminate messages sent to a customer. We store all this information in a secure database.

### **Commitment to Your Privacy**

As we’ve said, the Company takes protecting your privacy very seriously. To make sure your personal information is secure, we communicate these guidelines to our employees and strictly enforce privacy safeguards within the company. In addition, the Company supports industry initiatives, such as TRUSTe, to preserve privacy rights on the Internet and in all aspects of electronic commerce.

### **International Users**

The Company abides by the safe harbor framework set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information collected from the European Union.

### **Links to Sites of Other Companies**

Our website has links to the sites of other companies. We are not responsible for their privacy practices. We encourage you to learn about the privacy policies of those companies.

### **Further Questions Regarding Privacy**

If you have questions or concerns about the Company’s Customer Privacy Policy or data processing, you may email us at [marketing@buckles-smith.com](mailto:marketing@buckles-smith.com) (please include “Privacy Inquiry” in the subject line of your email).

If you do not want the Company to keep you up to date with Company news and the latest information on products and services, click <http://www.salesmanagementplus.com/Subscriptions/Identify.aspx?Page=BucklesSmith> and update your personal contact information and preferences. Naturally, if you notify us that you do not want us to use your information for a particular purpose, we will not do so.

### ***Notice of Compliance to California Residents***

*California law requires that we provide you with a summary of your privacy rights under the California Online Privacy Protection Act (“California Act”) and the California Business and Professions Code. As required by the California Act, this privacy policy identifies the categories of personally identifiable information that we collect*

through our web site about individual consumers who use or visit our web site and the categories of third-party persons or entities with whom such personally identifiable information may be shared.

Depending on the visitor’s activity at our web site, certain “personally identifiable information” (as that term is defined in the California Act) may be collected, in addition to information set forth in other sections of this document. For purposes of the California Act, the term “personally identifiable information” means individually identifiable information about an individual consumer collected online by us from an individual and maintained by us in an accessible form, and may include any of the following:

Category	Examples	Collected
Identifiers	Name, signature, address, telephone email, account name, online identifier, IP address	Yes
Government ID number	Social security number, passport number, driver’s license or state identification card number	No
Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	No
Biometric data	Imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, faceprint, voiceprint, keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data	No
Internet activity	Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.	Yes
Geolocation data	Physical location or movements	No
Audio, visual, olfactory information	Audio, electronic, visual, thermal, olfactory, or similar information.	No
Employment information	Current or past job history or performance evaluations.	Yes
Education information	Personally identifiable education information that is not publicly available (e.g. grades, financial aid)	No
Inferences	Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No

See main Privacy Policy section entitled “Effective Date; Updates to Privacy Policy” for a description of the process by which the Company notifies consumers who use or visit our web site of material changes to the Company’s privacy policy. The effective date of this privacy policy is also included in Section 15 above.]

#### **California Shine the Light Law (SB 27) Compliance Statement**

Under California S.B. 27 (“Shine the Light” Law), California residents have the right under certain circumstances to receive, once a year, information about third parties with whom we have shared information about you or your family for their marketing purposes during the previous calendar year, and a description of the categories of personal information shared. To make such a request, please send an email to [marketing@buckles-smith.com](mailto:marketing@buckles-smith.com) and please include the phrase “California Privacy Request” in the subject line, the domain name of the web site you are inquiring about, along with your name, address and email address. We will respond to you within thirty days of receiving such a request.

#### **Effective Date; Updates to Privacy Policy**

The terms and conditions in this policy statement came into effect on March 12, 2020. The Company reserves the right to revise, amend, or modify this policy at any time and in any manner. When we change the policy in a material way, a notice will be posted on our website along with the updated privacy policy. Your use of our website

and any other services provided by the Company after such changes are implemented constitutes your acknowledgement and acceptance of these changes. Please consult this privacy statement prior to any use of our website and services.