

## **BRASSCRAFT MANUFACTURING PRIVACY POLICY**

**Last Updated December 12, 2011**

**BrassCraft Manufacturing Company** (“**BrassCraft Mfg.**,” “**we**,” “**us**”) is concerned about online privacy issues, and wants you to be familiar with how BrassCraft Mfg. collects, uses and discloses your personally identifiable information in connection with our website. Accordingly, we have created this Privacy Policy for [www.brasscraft.com](http://www.brasscraft.com) and other websites operated by BrassCraft Mfg. that display or link to the Privacy Policy (collectively the “**Site**”) to demonstrate its firm commitment to online privacy. This Privacy Policy discloses BrassCraft Mfg.’s information gathering and dissemination practices for the information collected by BrassCraft Mfg. through this Site. This Privacy Policy does not govern our collection of information through any website, or by any other means, other than through the Site; nor does this Privacy Policy govern the collection of information by any of our Affiliated Entities (as defined below) or by third parties.

We encourage you to read this Privacy Policy before using this Site or submitting your personally identifiable information to us. Your use of this Site signifies that you agree with all terms of this Privacy Policy, so please do not use this Site or share your personally identifiable information with us or otherwise through the Site if you disagree with any part of this Privacy Policy.

### **Policy Modifications**

BrassCraft Mfg. reserves the right to make changes to this Privacy Policy. In the event that BrassCraft Mfg. makes a material change to this Privacy Policy, it will be posted here. We encourage you to check this page regularly because your continued use of this Site following any changes to the Privacy Policy will be deemed to constitute your acceptance of such change. You can determine when this Privacy Policy was last revised by referring to the “**Last Updated**” legend at the top of this page. In the event that BrassCraft Mfg. makes a material change to the Privacy Policy, a notice will be posted regarding such change.

### **Notice Regarding Use of this Site by Children**

This Site is not directed to children under the age of eighteen (18), and we request that children do not provide personally identifiable information through the Site.

### **How we Collect and Use Personally Identifiable Information**

We will collect personally identifiable information about you, such as your name, postal address, telephone number, and email address when you voluntarily provide it to us through this Site such as when you order literature, enter contests or incentive programs, sign up for newsletters, participate in a survey, contact customer service, or otherwise interact with this Site.

Your personally identifiable information may be used by us for all legal purposes, which may include, but are not limited to, responding to your requests, processing your transactions, notifying you of new products or product-related news, and for administrative purposes such as conducting incentive programs or tracking which parts of the Site are of interest to you.

We use your personally identifiable information to provide the services you request from BrassCraft Mfg. such as responding to product information requests; fulfilling orders for parts, products or customer service; administering contests or incentive programs; and facilitating on-line product visualization applications and preferred products catalogs. We also use personally identifiable information to send you news about our products and promotions, to conduct online surveys, contests,

other similar promotions or incentive programs via email, telephone or postal mail, and to notify you of special events and advertising in which you might be interested. Please see the “Sweepstakes, Contests, and Other Promotions” section below for more information on participating in such activities. Further, we may also use personally identifiable information to send you important information regarding the Site, changes to our terms, conditions, and policies and/or other administrative information; because this information may be important to your use of the Site, you may not opt-out of receiving such communications. In addition, we may use the information to improve BrassCraft Mfg.’s online and other services, such as customer service and product support, to understand consumer preferences in developing product improvements and innovations, and to ensure that our Site is of interest to you. We may also use your personally identifiable information for internal business purposes, such as optimizing users’ Site experiences and analyzing and managing our businesses. If you apply for employment with BrassCraft Mfg., we may use the personally identifiable information you supply to process your job application.

This Site may offer a feature that allows you to send an electronic postcard or otherwise share a message with a friend. If you choose to do so, we will ask you for the recipient’s name and email address, along with the text of any message you choose to include. By using this feature, you warrant that you are entitled to use and provide us with the recipient’s name and email address for this purpose.

We may also use your personally identifiable information: (i) as permitted by law; (ii) where we determine that such use is necessary to comply with the request of a law enforcement or regulatory agency or other legal process; (iii) to protect our operations or those of any of the Affiliated Entities; (iv) to protect the rights, privacy, property, interests of safety of BrassCraft Mfg., the Affiliated Entities, Site visitors, customers, business partners, employees or the public; (v) to permit us to pursue available remedies or limit the damages that we may sustain (vi) to enforce our Terms of Use; and (vii) to respond to an emergency.

#### **How We Collect and Use Non-Personal Information**

We may also collect other information that is not personally identifiable through this Site (“non-personal information”), such as your postal or Zip code, date of birth, gender, IP address, domain name, URL, browser and operating system and a record of the Site pages you visited. This data helps us to understand traffic patterns at this Site and may be used to tailor your experience at this Site, such as showing you content including special events and advertising that you might be interested in and displaying the content according to your postal code. At times we will use your IP address to help diagnose problems with our server and to administer our website. We also may track browser types to help us understand our visitors’ needs related to our website design.

Since non-personal information does not identify any particular individual, we may use such information for any purpose. In addition, we reserve the right to share such non-personal information with third parties, for any purpose.

In some instances, we may combine non-personal information with personally identifiable information (such as combining your name with your geographic location). If we do combine any non-personal information with personally identifiable information, the combined information will be treated by us as personally identifiable information in accordance with this Policy.

## **Cookies and Similar Technologies**

This Site uses cookies, which are small bits of data that a web server transfers to a computer for recordkeeping and other purposes. Cookies are an industry standard used by most websites to help facilitate users' ongoing access to and use of a particular website. If you want to remove cookies from your computer at any time, you can delete or automatically decline them using your browser. Please refer to your browser instructions or help screen to learn more about these functions. You should note, however, that declining cookies may make it difficult or impossible for you to use portions of the Site.

The Site may use so-called "pixel tags", "web beacons", "clear GIFs" or similar means (collectively, "Pixel Tags") to, among other things, compile aggregate statistics about Site usage and response rates. Pixel Tags allow us to, for example, count users who have visited certain pages of the Site and to help determine the effectiveness of promotional or advertising campaigns. When used in HTML-formatted email messages, Pixel Tags can tell the sender whether and when the email has been opened. We use the information received from these Pixel Tags in the aggregate for statistical analysis, among other things.

Some uses of cookies and Pixel Tags in connection with the Site may be under the control of unaffiliated third-party entities that BrassCraft Mfg. retains to manage certain programs and fulfill specific visitor requests. BrassCraft Mfg. cannot be responsible for third-party uses of cookies and Pixel Tags.

We treat information collected through the use of cookies and Pixel Tags as non-personal information.

## **How We Share Personally Identifiable Information**

BrassCraft Mfg. may share personally identifiable information collected via the Site with Affiliated Entities or other third parties as described below. You should also be aware that personally identifiable information about you may be transferred to or received by Affiliated Entities or third parties in the U.S. or in other countries, which countries may have different privacy regulations than those applicable in the country where you reside.

- **Affiliated Entities.** We may share personally identifiable information with our parent, subsidiaries and affiliates worldwide (collectively, "Affiliated Entities") for the purposes described in this Privacy Policy, including to permit such Affiliated Entities to send you marketing materials. If you wish to opt-out from our sharing of your personally identifiable information with Affiliated Entities for their marketing purposes, please see the "Choice: Opt-Out" section below for information on how to opt-out. You may access a list of certain Affiliated Entities at [http://www.masco.com/our\\_companies/index.html](http://www.masco.com/our_companies/index.html).
- **Service Providers.** We may use third-party service providers to help us operate our business and this Site, or to administer activities on our behalf, such as sending emails, hosting dealer locator sites, conducting advertising or customer service, and administering contests or incentive programs. We may share personally identifiable information with these third parties for those business purposes. For instance, if you request a brochure, we may share personally identifiable information about you with fulfillment and management agencies to complete your request.
- **Distributors and Retailers.** We may share personally identifiable information with third parties that offer our products for sale. The third-party distributor or retailer may contact you directly by email, phone or postal mail. If you provide any personally identifiable information to such a third party through its website or otherwise, your transaction will occur with the third party (and not on this Site) and the personally identifiable information you provide will be collected by, and controlled by the privacy policy of, that third party. BrassCraft Mfg. recommends that

you review the privacy policy of third parties who may contact you about BrassCraft Mfg. or Affiliated Entities' products or services.

- **Other Third Parties.** We may share personally identifiable information with unaffiliated third parties, including distributors and retailers, to permit such third parties to send to you marketing materials. If you wish to opt-out from our sharing of your personally identifiable information with third parties for their marketing purposes, please see the "Choice: Opt-Out" section below for information on how to opt-out.
- **Emails to Friends.** Please note that any personally identifiable information you provide in connection with sending an electronic postcard or other message to a friend through the Site, such as your name and your email address, will, of course, be disclosed to you friend.
- **Sweepstakes, Contests and other Promotions.** We may operate sweepstakes, contests, raffles and similar promotions through the Site that may require online registration with us or with third party sponsors of such sweepstakes, contests, raffles or other promotions. You should carefully review the rules of each sweepstakes, contest, raffle and promotion in which you participate through the Site, as they may contain additional important information about BrassCraft Mfg.'s or a sponsor's use or disclosure of your personally identifiable information. To the extent that the terms and conditions of such rules concerning the treatment of personally identifiable information conflict with this Policy, the terms and conditions of such rules shall control.
- **We reserve the right to share the PII you provide in connection with sweepstakes, contests and similar promotions with third parties sponsors of such sweepstakes, contests and other promotions (irrespective of whether such promotions are hosted by us), or otherwise in accordance with the rules applicable to such sweepstake, contest or other promotion.**
- **Assignment.** We reserve the right to transfer any and all information that we collect from Site users to an Affiliated Entity or a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of BrassCraft Mfg.'s business, assets or stock (including without limitation in connection with any bankruptcy or similar proceedings).
- **Other Disclosures.** Personally identifiable information of any individual user also may be shared with other companies outside BrassCraft Mfg.: (i) as permitted by law; (ii) where we determine that disclosure of specific information is necessary to comply with the request of a law enforcement or regulatory agency or other legal process; (iii) to protect our operations or those of any of the Affiliated Entities; (iv) to protect the rights, privacy, property, interests or safety of BrassCraft Mfg., the Affiliated Entities, Site visitors, customers, business partners, employees or the public; (v) to permit us to pursue available remedies or limit the damages that we may sustain (vi) to enforce our Terms of Use; and (vii) to respond to an emergency.
- **Co-Branded Pages.** From time to time, we may enter into a special relationship with another company that is not owned by or affiliated with BrassCraft Mfg. to provide additional features on this Site, such as co-branded sites (referred to here as "co-branded pages"). Any personally identifiable information that you provide on one of these co-branded pages may be shared with or accessible by these third-party partners. Both Company and the third party partner are collecting personally identifiable information on these co-branded pages, and Company's collection, use and disclosure of the personally identifiable information is subject to this Privacy Policy, and the third party's Company's collection, use and disclosure of the personally identifiable information is subject to its privacy policy. By submitting your personally identifiable information through these co-branded pages, you also consent to our sharing this information with those third-party partners. You should review the privacy policies posted on

these co-branded pages to understand how personally identifiable information collected through these pages will be collected and used.

### **User Generated Content Functions**

Certain pages on this Site enable users to create their own profile page or submit their own content (for example, message boards, forums, chat functionality and blogs, among other services). Any information you disclose in such a profile page or submission may be publicly available and be read, collected, or otherwise used by anyone who visits the URL of the page on which you have chosen to comment, and you should exercise caution in deciding whether to disclose your personal, financial or other sensitive information there. BrassCraft Mfg. cannot prevent such publicly-available information from being used by others in a manner that may violate this Policy, the law, or your personal privacy and safety, and is not responsible or liable for the results of any postings or the use or disclosure of any information that you disclose via such postings.

### **Choice: Opt-out**

If you do not wish to receive marketing-related emails from us, or if you would prefer that we do not share personally identifiable information about you collected via the Site with Affiliated Entities or other third parties for such Affiliated Entities or other third parties' marketing purposes, you may opt-out of receiving such marketing-related emails or from such sharing by submitting your request in writing and emailing it to the following address: [customerservice@brasscrafthq.com](mailto:customerservice@brasscrafthq.com). Please specify clearly which of the following choices you are opting out from:

- Receiving marketing-related emails from BrassCraft Mfg.
- Allowing BrassCraft Mfg. to share personally identifiable information about you with Company's Affiliated Entities (including its parent and subsidiaries) for their marketing purposes; and/or
- Allowing BrassCraft Mfg. to share personally identifiable information about you with third parties for their marketing purposes.

We will endeavor to comply with your request as soon as reasonably practicable. Please note that, if you opt-out as described above, we will not be able to remove personally identifiable information about you from the databases of Affiliated Entities or other third parties with which we have already shared your personally identifiable information as of the date on which we implement your opt-out request. If you wish to cease receiving marketing-related emails from such Affiliated Entities or other third parties, please contact such Affiliated Entities or other third parties directly or utilize any opt-out mechanisms set forth in their respective privacy policies or marketing-related emails.

### **Links and Third Parties' Privacy Practices**

This Site may contain links to other sites which are not operated by BrassCraft Mfg. BrassCraft Mfg. IS NOT RESPONSIBLE FOR THE PRIVACY PRACTICES OR THE CONTENT OF SUCH OTHER WEBSITES, INCLUDING WEBSITES OPERATED BY AFFILIATED ENTITIES. We provide such links only as a convenience, and the inclusion of links on the Site does not imply endorsement of the linked site by BrassCraft Mfg. If you provide any personally identifiable information through any such third party website, your transaction will occur on such third-party's website (and not on this Site) and the personally identifiable information you provide will be collected by, and controlled by the privacy policy of, that third party. BrassCraft Mfg. recommends that you review the privacy policy of third-party websites arrived at from links on this Site.

**Security of Personally Identifiable Information**

BrassCraft Mfg. takes measures to protect personally identifiable information collected through this Site against unauthorized access, disclosure, alteration or destruction. We also seek to require our Affiliated Entities and service providers to exercise reasonable efforts to maintain the confidentiality of any personally identifiable information about you that they receive from BrassCraft Mfg. Unfortunately, however, no security system or system of transmitting data over the Internet can be guaranteed to be entirely secure.

For your own privacy protection, we encourage you not to include sensitive personally identifiable information in any emails you may send to us. Note that BrassCraft Mfg. will not request sensitive personally identifiable information in our emails to you and you should verify the authenticity of any such request.

**Retaining Personally Identifiable Information**

We retain personally identifiable information about you for the period necessary to fulfill the purposes outlined in this Policy unless a longer retention period is required or permitted by applicable law.

**Questions**

If you have any questions about this Policy or how BrassCraft Mfg. processes your personally identifiable information, please contact us by email through the Contact Us section on [www.brasscraft.com](http://www.brasscraft.com).