

Privacy Policy

Last Updated: December 17, 2019

Brasscraft Manufacturing Company ("Brasscraft Mfg. Co.", "we", "us") is concerned about privacy issues and wants you to be familiar with how Brasscraft Mfg. Co. collects, uses and discloses your information in connection with our business. Accordingly, we have created this Privacy Policy to describe our practices in connection with information that we collect through: (1) in-person interactions at trade shows, during in-person market research and at retail stores where our products are sold, to name a few, (2) websites operated by us from which you are accessing this Privacy Policy (the "Sites"), (3) through the software applications made available by us for use on or through computers and mobile devices (the "Apps"), (4) through our social media pages and apps located at:

Facebook (<https://www.facebook.com/brasscraft>,
<https://www.facebook.com/Plumbshop/>, <https://www.facebook.com/CobraToolsUS/>),
Twitter (<https://twitter.com/brasscraft>) <https://twitter.com/Plumbshop>),
Instagram (<http://instagram.com/brasscraft> ,
<https://www.instagram.com/plumbshop>, <https://www.instagram.com/cobratools>),
YouTube (<https://www.youtube.com/user/brasscraft>,
<https://www.youtube.com/channel/UCjPx7Nsgd2FQ2xikJmX1y-g>,
<https://www.youtube.com/user/cobraproducts>)
and LinkedIn (<https://www.linkedin.com/company/brasscraft>)

(collectively, our "Social Media Pages"), and (5) HTML-formatted email messages that we send to you that link to this Privacy Policy (collectively, including the Sites, Apps and our Social Media Pages, the "Services"). Except as otherwise expressly provided herein, this Privacy Policy does not govern our collection of information through any website not identified in this Privacy Policy or by any other means other than through the Services; 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 the Services or submitting your personal information to us. "Personal information" is information that identifies you as an individual or relates to an identifiable individual.

Your use of the Services signifies that you agree with all terms of this Privacy Policy, so please do not use the Services if you disagree with any part of this Privacy Policy.

Policy Modifications

Brasscraft Mfg. Co. reserves the right to make changes to this Privacy Policy. In the event that Brasscraft Mfg. Co. 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 the Services 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.

Notice Regarding Use of the Services by Children

The Services are not directed to children under the age of eighteen (18), and we request that children do not provide personal information through the Services.

How We Collect and Use Personal Information

We will collect personal information about you, such as your name, postal address, telephone and mobile numbers, email address, credit card number or other payment number, date of birth, gender, IP address, profile pictures, or social media IDs through your use of the Services, such as when you create an account or profile, order or register a product, order literature, enter contests or incentive programs, sign up for newsletters, download an App, participate in a survey, contact customer service, or otherwise interact with the Services. We may also receive your personal information from other sources, such as public data bases; joint marketing partners; social media platforms; from people with whom you are friends or otherwise connected on social media platforms; as well as from other third parties. For example, if you elect to connect your social media account to your Site account, certain personal information from your social media account will be shared with us, which may include personal information that is part of your profile or your friends' profiles.

We use your personal information to provide the services you request from Brasscraft Mfg. Co. such as responding to product information requests; registering products; fulfilling orders for parts, products or customer service; initiating refunds; administering contests or incentive programs; and facilitating on-line product visualization applications and preferred products catalogs. We also use personal 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 that you might be interested in. Please see the "Sweepstakes, Contests, and Other Promotions" section below for more information on participating in such activities. Further, we may also use personal information to send you important information regarding the Services, changes to our terms, conditions, and policies and/or other administrative information. Because this information may be important to your use of the Services, you may not opt-out of receiving such communications. In addition, we may use the information to improve Brasscraft Mfg. Co.'s online and other services, such as through customer service and product support, to understand consumer preferences in developing product improvements and innovations. We may also use your personal information for internal business purposes, such as optimizing users' Services experiences and analyzing, managing and expanding our businesses. If you apply for employment with Brasscraft Mfg. Co., we may use the personal information you supply to process your job application.

The Services may offer a feature that allows you to send an electronic postcard or otherwise share a message with a friend. If you choose to use this feature, 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 are telling us that you are entitled provide us with the recipient's name and email address for this purpose.

We may also use your personal information: (i) as necessary or appropriate under applicable 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 or safety of Brasscraft Mfg. Co., the Affiliated Entities, Services 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; (vii) to respond to an emergency; and (viii) in connection with any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Brasscraft Mfg. Co.'s business, assets or stock (including without limitation in connection with any bankruptcy or similar proceedings).

How We Share Personal Information

Brasscraft Mfg. Co. may share personal information collected via the Services with Affiliated Entities or other third parties as described below. You should also be aware that personal 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 personal 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 personal information with Affiliated Entities for their marketing purposes, please see the “Choice: Opt-Out” section below for information on how to opt-out.
- ***Service Providers.*** We may use third-party service providers to help us operate our business and the Services or to administer activities on our behalf, such as sending emails, hosting dealer locator sites, providing order fulfillment, conducting advertising or customer service, and administering contests or incentive programs. We may share personal information with these third parties for those business purposes. For instance, if you request a brochure, we may share personal information about you with fulfillment and management agencies to complete your request.
- ***Dealers and Retailers.*** We may share personal information with third parties that offer our products for sale. The third-party dealer or retailer may contact you directly by email, phone or postal mail. If you wish to opt-out from our sharing of your personal information with such third parties for their marketing purposes, please see the “Choice: Opt-Out” section below for information on how to opt-out. If you provide any personal information to such a third party through its website or otherwise, your transaction will occur with the third party (and not on the Services) and the personal information you provide will be collected pursuant to the privacy policy of that third party. Brasscraft Mfg. Co. recommends that you review the privacy policy of third parties who may contact you about Brasscraft Mfg. Co. or Affiliated Entities’ products or services.
- ***Other Third Parties.*** We may share personal information with unaffiliated third parties, including dealers and retailers discussed above, to permit such third parties to send to you marketing materials. If you wish to opt-out from our sharing of your personal information with third parties for their marketing purposes, please see the “Choice: Opt-Out” section below for information on how to opt-out.
- ***E-mails to Friends.*** Please note that any personal information you provide in connection with sending an electronic postcard or other message to a friend through the Services, such as your name and your e-mail address, will, of course, be disclosed to your friend.
- ***Social Media.*** We may share any personal information you provide with your friends associated with your social media account, to other website users and as well as to your social media account provider, in connection with your social sharing activity, such as if you connect your social media account to your Services account or log-into your Services

account from your social media account. By connecting your Services account and your social media account you authorize us to share information with your social media account provider and you understand that the use of the information we share will be governed by the social media site's privacy policy. If you do not want your personal information shared with other users or with your social media account provider, please do not connect your social media account with your Services account and do not participate in social sharing on the Services.

- **Promotions.** We may share the personal information you provide in connection with sweepstakes, contests and similar promotions with third party sponsors of such promotions (irrespective of whether such promotions are hosted by us), or otherwise in accordance with the rules applicable to such promotion. Please see the "Sweepstakes, Contests, and Other Promotions" section below for more information on participating in such activities.
- **Assignment.** We may transfer information that we collect from Services 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. Co.'s business, assets or stock (including without limitation in connection with any bankruptcy or similar proceedings).
- **Other Disclosures.** We may share your personal information as we believe to be necessary or appropriate: (i) under applicable law, which may include laws outside your country of residence; (ii) to comply with the request of a law enforcement or regulatory agency (including agencies outside your country of residence) 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. Co., the Affiliated Entities, Services 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. Co. to provide additional features on the Services, such as co-branded pages. Both Brasscraft Mfg. Co. and the third-party collect personal information on these co-branded pages. Brasscraft Mfg. Co.'s collection, use and disclosure of the personal information are subject to this Privacy Policy, and the third party's collection, use and disclosure of the personal information are subject to its privacy policy. You should review the privacy policies posted on these co-branded pages to understand how personal information collected through these pages will be collected and used.
- **Purchases.** We may use third-party payment services (each, a "Payment Service") to collect payments made through the Services. If you wish to make a payment through the Services, you will be directed to a webpage that is hosted by the Payment Service (or the Payment Service's service providers) and not by us (such page, the "Payment Service Page"). Any personal information that you provide through the Payment Service Page will be collected by Payment Service and not by us, and will be subject to Payment Service's privacy policy, rather than this Policy. Brasscraft Mfg. Co. has no control over, and shall

not be responsible for, Payment Service's use of information collected through the Payment Service Page.

How We Collect and Use Other Information

We may also collect other information that does not reveal your specific identity or directly relate to an individual through the Services ("other information"), such as domain, URL, browser, device and operating system information, information about visits to the Services pages, App usage data, physical location and information collected through cookies, pixel tags and other technologies, demographic information provided by you that does not reveal your specific identity, and information that has been aggregated in a manner such that it no longer reveals your specific identity.

We and our third-party service providers may collect other information in a variety of ways, including:

- ***Through your browser or device.*** Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version and the name and version of the Services (such as the App) you are using. We use this information to ensure that the Services function properly.
- ***Through your use of the Apps.*** When you download and use an App, we and our service providers may track and collect App usage data, such as the date and time the App on your device accesses our servers and what information and files have been downloaded to the App based on your device number.
- ***Using cookies.*** Cookies are pieces of information stored directly on the computer that you are using. Cookies allow us to collect information such as browser type, time spent on the Services, pages visited, language preferences, and other traffic data. We and our service providers use the information for security purposes, to facilitate navigation, to display information more effectively, and to personalize your experience while using the Services, as well as for online tracking purposes. We can recognize your computer to assist your use of the Services. We also gather statistical information about the usage of the Services in order to continually improve their design and functionality, understand how the Services are used and to assist us with resolving questions regarding the Services. Cookies further allow us to select which of our advertisements or offers are most likely to appeal to you and display them while you are on the Services. We may also use cookies in online advertising to track responses to our advertisements, and we may use cookies to track how you arrived at our site from another website to improve your on-line experience with us.

If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to automatically decline cookies, or be given the choice of declining or accepting the transfer to your computer of a particular cookie (or cookies) from a particular site. You may also wish to refer to <http://www.allaboutcookies.org/manage-cookies/index.html>. However, if you do not accept these cookies, you may experience some inconvenience in your use of the Services. For example, we may not be able to recognize your

computer and you may need to log in every time you visit the applicable Services. You also may not receive advertising or other offers from us that are relevant to your interests and needs.

- **Using pixel tags and other similar technologies.** Pixel tags (also known as web beacons and clear GIFs) may be used in connection with some Services to, among other things, track the actions of users of the Services (including email recipients), measure the success of our marketing campaigns and compile statistics about usage of the Services and response rates.
- We do not respond to browser do-not-track signals at this time.
- **Using Google Analytics.** We use Google Analytics, a Google service that uses cookies and other, similar technologies to collect and analyze information about use of the Services and report on activities and website trends. We also use an enhancement to Google Analytics called “Demographics and Interest Reporting,” through which Google provides us with information about our users’ demographics (e.g., age, gender) and interests. This information, which Google may collect by tracking a user’s behavior across third-party websites, helps us to learn more about our users. You can learn about Google’s practices in connection with this enhanced tracking and opt out of it by visiting www.google.com/settings/ads or by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.
- **Using Adobe Flash technology (including Flash Local Shared Objects (“Flash LSOs”)) and other similar technologies.** We may use Flash LSOs and other technologies to, among other things, collect and store information about your use of the Services. If you do not want Flash LSOs stored on your computer, you can adjust the settings of your Flash player to block Flash LSO storage using the tools contained in the Website Storage Settings Panel. You can also control Flash LSOs by going to the Global Storage Settings Panel and following the instructions (which may include instructions that explain, for example, how to delete existing Flash LSOs (referred to “information on the Macromedia site), how to prevent Flash LSOs from being placed on your computer without your being asked, and (for Flash Player 8 and later) how to block Flash LSOs that are not being delivered by the operator of the page you are on at the time). Please note that setting the Flash Player to restrict or limit acceptance of Flash LSOs may reduce or impede the functionality of some Flash applications, including, potentially, Flash applications used in connection with the Services or our online content.
- **Physical Location.** We may collect the physical location of your device by, for example, using satellite, cell phone tower or WiFi signals. We may use your device’s physical location to provide you with personalized location-based services and content. We may also share your device’s physical location, combined with information about what advertisements you viewed and other information we collect, with our marketing partners to enable them to provide you with more personalized content and to study the effectiveness of advertising campaigns. In some instances, you may be permitted to allow or deny such uses and/or sharing of your device’s location, but if you choose to deny such uses and/or sharing, we and/or our marketing partners may not be able to provide you with the applicable personalized services and content.
- **From you.** Information, such as your preferred means of communication is collected when you voluntarily provide it. Unless combined with personal information, this information does not personally identify you.

- ***By aggregating information.*** Aggregated personal information does not personally identify you or any other user of the Services (for example, we may aggregate personal information to calculate the percentage of our users who have a particular telephone area code).

We may use and disclose other information for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat other information as personal information under applicable law, then we may use it for all the purposes for which we use and disclose personal information.

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

Selling of Personal Information

We do not sell your personal information or any other information we collect about you to any affiliated or unaffiliated third parties.

User Generated Content Functions

Certain pages on the Services, including our Social Media Pages, 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 connection with such services may be publicly available and be read, collected, or otherwise used by anyone who visits the page on which you have chosen to comment, and you should exercise caution in deciding whether to disclose your information there. Brasscraft Mfg. Co. 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 personal information about you collected via the Services or otherwise with Affiliated Entities or other third parties for such Affiliates Entities' or other third parties' marketing purposes, you may opt-out of receiving such marketing-related emails and from such sharing by following the unsubscribe instructions contained in each such email.

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 personal information about you from the databases of Affiliated Entities or other third parties with which we have already shared your personal 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.

Sweepstakes, Contests, and Other Promotions

We may operate sweepstakes, contests, raffles and similar promotions through the Services that may require online registration with us or with third-party sponsors of such promotions. You

should carefully review the rules of each promotion in which you participate through the Services, as they may contain additional important information about Brasscraft Mfg. Co.'s or a sponsor's use or disclosure of your personal information. To the extent that the terms and conditions of such rules concerning the treatment of personal information conflict with this Policy, the terms and conditions of such rules shall control.

Third-Party Services

The Services may contain links to other sites which are not operated by Brasscraft Mfg. Co. BRASSCRAFT MFG. CO. 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 Services does not imply endorsement of the linked site by Brasscraft Mfg. Co. If you provide any personal information through any such third-party website, your transaction will occur on such third party's website (and not on the Services) and the personal information you provide will be subject to the privacy policy of that third party. Brasscraft Mfg. Co. recommends that you review the privacy policy of third-party websites arrived at from links on the Services.

In addition, we are not responsible for the information collection, usage, disclosure or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, RIM or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including with respect to any personal information you disclose to other organizations through or in connection with the Apps or our Social Media Pages.

Third-Party Advertisers

We may use third-party advertising companies to serve advertisements regarding goods and services that may be of interest to you when you access and use the Services and other websites or online services, based on information relating to your access to and use of the Services and other websites or online services on any of your devices, as well as on information received from third parties. To do so, these companies may place or recognize a unique cookie on your browser (including through the use of pixel tags). They may also use these technologies, along with information they collect about your online use, to recognize you across the devices you use, such as a mobile phone and a laptop. If you would like more information about this practice, and to learn how to opt out of it in desktop and mobile browsers on the particular device on which you are accessing this Privacy Policy, please visit http://www.networkadvertising.org/managing/opt_out.asp and <http://www.aboutads.info/>. You may download the AppChoices app at www.aboutads.info/appchoices to opt out in mobile apps.

Security of Personal Information

Brasscraft Mfg. Co. takes measures designed to protect personal information collected through the Services against unauthorized access, disclosure, alteration or destruction. Unfortunately, however, no security system or system of transmitting data over the Internet can be guaranteed to be entirely secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us in accordance with the "*Questions*" section below.

For your own protection, we encourage you not to include sensitive personal information, such as payment card information, in any emails you may send to us. Brasscraft Mfg. Co. will not request sensitive personal information in our emails to you.

Jurisdictional Issues

Your personal information may be stored and processed in any country where we have facilities, where our Affiliated Entities are located, or in which we engage service providers, and by using the Services you understand that your information will be transferred to countries outside of your country of residence, which may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your personal information.

Questions

If you have any questions about this Policy or how Brasscraft Mfg. Co. processes your personal information, please contact us by e-mail through the Let's Connect section on www.brasscraftmfgco.com.

ADDITIONAL INFORMATION REGARDING CALIFORNIA

Pursuant to the California Consumer Privacy Act of 2018 (“CCPA”), we are providing the following additional details regarding the categories of personal information about California residents that we have collected or disclosed within the preceding 12 months:

- **What We Collect.** We collected the following categories of personal information:
 1. Identifiers, such as name, contact information, IP address;
 2. Personal information, as defined in the California customer records law, such as name, address, telephone number, email, social media account ID, date of birth, and information related to employment, education and experiences, preferences and interests;
 3. Characteristics of protected classifications under California or federal law, such as sex, age;
 4. Commercial information, such as transaction information, purchase history, financial details and payment methods; and
 5. Images and videos created in connection with our business activities.
- **From Whom We Collect.** We collect this personal information from you and from other categories of sources, which include: our Affiliated Entities; public databases; joint marketing partners; social media platforms; from people whom you are otherwise connected with on social media platforms; and other third parties, when they share the information with us. We use and disclose this personal information to operate, manage, and maintain our business, to provide our products and services, for our vendor management purposes, to accomplish our business purposes and objectives, and for the purposes described above in this Policy.
- **To Whom We Disclose.** As described above in this Policy, we disclosed the following personal information to third parties, including our Affiliated Entities, service providers (including internet service providers and data analytics providers), business partners (including dealers, retailers and partners for co-branded pages), third-party sponsors of sweepstakes,

contests and similar promotions, third parties to permit them to send you marketing communications, consistent with your choices, your social media account provider, third parties in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including without limitation in connection with any bankruptcy or similar proceedings), and public or government entities for our operational business purposes:

1. Identifiers, such as name, contact information, IP address;
 2. Personal information, as defined in the California customer records law, such as name, address, telephone number, email, social media account ID, date of birth, and information related to employment, education and experiences, preferences and interests;
 3. Characteristics of protected classifications under California or federal law, such as sex, age;
 4. Commercial information, such as transaction information, purchase history, financial details and payment methods; and
 5. Images and videos created in connection with our business activities.
- ***We Do Not Sell.*** We have not “sold” personal information for purposes of the CCPA. For purposes of this Policy, “sold” or “sale” means the disclosure of personal information for monetary or other valuable consideration but does not include, for example, the transfer of personal information as an asset that is part of a merger, bankruptcy, or other disposition of all or any portion of our business.
 - ***Right to Request.*** If you are a California resident, you may have the right to request that we:
 1. Disclose to you the following information covering the 12 months preceding your request:
 - a) The categories of personal information we collected about you and the categories of sources from which we collected such personal information;
 - b) The specific pieces of personal information we collected about you;
 - c) The business or commercial purpose for collecting personal information about you; and
 - d) The categories of personal information about you that we otherwise shared or disclosed, and the categories of third parties with whom we shared or to whom we disclosed such personal information (if applicable).
 2. Delete personal information we collected from you.

We will respond to your request consistent with applicable law. You have the right to be free from unlawful discrimination for exercising your rights under the CCPA.

- ***How We Verify Your Request.*** In order to process your request, you must provide us with the following personal information, which will be used solely for the purpose of verifying your identity:
 1. Name;
 2. Address; and
 3. Email address.

Upon receipt of this information, we will compare the personal information you provide in connection with your request to the consumer information we have in our systems and

applications to determine whether or not we have any of your personal information. If additional information is necessary to verify your identity, we will send a Requesting Additional Information letter to you using the same method of communication you used to submit your request unless you designate a different method of communication.

- ***How to Make Requests.*** If you are a California resident, you may make a request for the disclosures described above or make a request to delete personal information we collected from you, by contacting us at:
 1. [\(877\) 272-7755](tel:8772727755) or
 2. customerservice@brasscrafthq.com.