# Induction Innovations PRIVACY POLICY



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# **Privacy Policy**

Effective date: June 18, 2020

Induction Innovations<sup>®</sup>, Inc. ("us", "we", "our", or "Induction Innovations") manufactures induction heating tools for use in removing fasteners. We operate the <u>www.theinductor.com</u> website.

Our website collects and dispenses information to assist in the sale of our tools and for our customers to shop and make buying decisions. All of the foregoing are referred to as the "Service."

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data.

Induction Innovations may use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms of Use.

This Privacy Policy does not apply to any websites operated by third parties. We are not responsible for, and this Privacy Policy does not apply to, the privacy practices of other companies or other websites. We encourage you to seek out and read the privacy policy of each website that you visit.

# **Definitions**

- Service: the www.theinductor.com website operated by Induction Innovations
- **Personal Data**: means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession)
- **Usage Data**: data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit)
- Cookies: small pieces of data stored on your device (computer or mobile device)
- **Data Controller**: means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed; for the purpose of this Privacy Policy, we are a Data Controller of your Personal Data
- Data Processors (or Service Providers): means any natural or legal person who processes the data on behalf of the Data Controller; we may use the services of various Service Providers in order to process your data more effectively
- **Data Subject (or User)**: any living individual who is using our Service and is the subject of Personal Data

### **Information Collection & Use**

Induction Innovations collects several different types of information for various purposes to provide and improve our Service to you.

#### **Types of Data Collected**

#### **Information You Provide Us**

You must fill in our forms before we have any personal information about you. Completing and submitting a form evidences your consent for us to obtain and use the information you provide to us, as indicated herein.

While using our Service, our <u>contact form</u> and check out page (dynamically created after clicking "Check Out" on the <u>checkout page</u>) provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, state, province, zip/postal code, city

We do not retain credit card information at any time during or following purchases on the Site.

If you opt in, we may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send or by contacting us.

#### **Tracking & Cookies Data**

When you use the Site, we and our third-party service providers may automatically collect information about how you access and use the Site and information about the device you use to access the Site. We typically collect this information through a variety of tools, including cookies, web beacons, pixels, social media widgets, other tools to enable data recording and indexing, and similar tracking technologies (collectively, "tracking technologies").

We and our third-party partners may automatically collect such information as:

- IP or MAC address
- Device type
- Unique device identifier (UDID) or other device identifier (IMEI)
- Browser type

- Operating system or platform
- Name of Internet Service Provider (ISP)
- Referring website
- Exiting website
- Clickstream data
- Search terms entered on the Site
- Pages visited on the Site
- Time, date, and duration of visit to the Site
- Whether you open emails from us
- Links you click on in our emails and on the Site
- Whether you access the Site from multiple devices
- Other interactions you may have on the Site
- Location or geo-location data (latitude/longitude, Wi-Fi / cell tower location, etc.)

The Induction Innovations website uses two types of cookies:

- Required: these cookies are necessary for site functionality and cannot be disabled
- Performance & Tracking: these cookies can be disabled here

# Use of Data

We process personal information in order to provide products and services to you and additional services you request, as well as to respond to communications from you. The precise purposes for which your personal information is processed will be determined by the request, and by applicable laws, regulatory guidance, and professional standards.

We use information we collect from you and information that we collect automatically to manage and improve the Site and our business. We take steps to ensure that your rights are safeguarded. For example, we use information to:

- Fulfill your orders and provide services to you. For example, we will collect and use your personal information to process and ship your orders, and to inform you about the status of your orders.
- Provide the Site and its features and functionality to you.

- Conduct data analytics to support the Site and our business. For example, we may analyze website user behavior and conduct research and analysis about the way you and other users use the Site.
- Manage, operate, and improve our business. For example, we may use data to improve the Site and/or our products and services, to develop new products and services, to market and promote our products and services, to administer promotions and other programs, to maintain our business records, to conduct internal monitoring and training, and to otherwise fulfill our other contractual obligations to you or other users or third parties.
- Manage risk and protect the Site. We use data to better protect our services, the Site, and you and our other users by helping to detect and prevent fraud and abuse of the Site or our services.
- Comply with our legal and regulatory obligations. We will use your information as necessary to enforce the terms of the Site and to comply with all applicable laws and regulations and other legal requirements.
- For other purposes for which you provide your consent. For other purposes which are disclosed to you at the time your information is collected, or for purposes which can be inferred from or are obvious given the circumstances of collection.

# **Legal Basis for Processing Personal Data Under General Data Protection Regulation (GDPR)**

If you are from the European Economic Area (EEA), Induction Innovations legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

Induction Innovations may process your Personal Data because:

- We need to perform a contract with you
- You have given us permission to do so
- The processing is in our legitimate interests and it's not overridden by your rights
- To comply with the law

# **Retention of Data**

Induction Innovations will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Induction Innovations will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

### Transfer of Data

Your information, including Personal Data, may be transferred to—and maintained on—computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside United States and choose to provide information to us, please note that we transfer the data, including Personal Data, to the United States and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

# **Disclosure of Data**

We do not sell, trade, or transfer your personal information to third parties, except in the circumstances described in this Privacy Policy.

#### **Third-Party Service Providers**

We may disclose your personal information to our vendors and other third-party service providers that help us provide services and support features on the Site.

#### **Legal Requirements and Business Transfers**

We may disclose personal information: (i) if we are required to do so by law, legal process, statute, rule, regulation, or professional standard, or to respond to a subpoena, search warrant, or other government official requests; (ii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss; (iii) in connection with an investigation of a complaint, security threat, or suspected or actual illegal activity; (iv) in connection with an internal or external audit; or (v) in the event that Induction Innovations is subject to mergers, acquisitions, joint ventures, sales of assets, reorganizations, divestitures, dissolutions, bankruptcies, liquidations, or other types of business transactions. In these instances, personal information may be shared or transferred, and it may be used subsequently by a third party.

# **Security of Data**

The security of your data is important to us but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

# "Do Not Track" Signals

We do not support Do Not Track ("DNT"). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked.

You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

# Your Data Protection Rights Under General Data Protection Regulation (GDPR)

As a resident of the EEA, you have certain data protection rights. Induction Innovations aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

- The right to access, update or to delete the information we have on you. Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you. The person to contact is set out below.
- The right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete.
- The right to object. You have the right to object to our processing of your Personal Data
- The right of restriction. You have the right to request that we restrict the processing of your personal information.
- The right to data portability. You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
- The right to withdraw consent. You also have the right to withdraw your consent at any time where Induction Innovations relied on your consent to process your personal information.

To make one of the above requests you should contact our Data Protection Officer (DPO) by contacting us here.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

# Your California Privacy Rights

Under California Civil Code Section 1798.83 et. Seq. and sections 100,105,110, 115 and 125, individual users who reside in California from whom we collect personal information may request information about categories of information we collect, whether we sell such information and the categories of third parties we sell such information to, whether we share such information with third parties where information is not sold and the categories of third parties we share such information with and the categories of information shared.

To make such a request, send an email with the subject heading "California Privacy Rights" to <a href="info@theinductor.com">info@theinductor.com</a>. If you have an account with us, or mail us at: 1175 Jansen Ct. Road Elgin, Illinois 60123 Attention CCPA Request. In your request, please attest to the fact that you are a California resident and provide a current California address for our response. Please be aware that not all information sharing is covered by these California privacy rights requirements and only information on covered sharing will be included in our response. This request may be made no more than once per calendar year.

Pursuant to applicable California law, including the California Consumer Privacy Act (CCPA), Induction Innovations makes the following further disclosures regarding the personal information collected within the last 12 months:

Category of Personal Information	Category of Source from which Data is Collected	Purpose of Collection	Category of Third Parties to whom Data is Disclosed
Contact information such as first and last name, company name, phone number, and email address	Directly from user	To provide our services and communicate with our users	Service Providers
Shipping and billing information such as mailing address, billing name and address, and credit card number or other payment information	Directly from user	To fulfill orders and facilitate payment for our products and services	Service Providers
Automatically collected information such as browser type, device type, and IP address	Cookies and other tracking technologies	To gather information about use of the Site, to improve the Site, and to enhance functionality of the Site	Service Providers

Induction Innovations has not sold consumers' personal information in the twelve (12) months preceding the effective date of this Privacy Policy.

If you are a California resident, pursuant to the CCPA, you have the right to request:

- The categories of personal information Induction Innovations has collected about you
- The categories of sources from which your personal information is collected
- The business or commercial purpose of collecting or selling your personal information
- The categories of third parties with whom Induction Innovations shares your personal information
- The specific pieces of personal information Induction Innovations has collected about you
- The categories of personal information that Induction Innovations has sold about you and the categories of third parties to whom the personal information was sold, if applicable
- Deletion of your personal information
- An opt out of having your personal information disclosed or sold to third parties

To submit a request, or designate an authorized agent to make a request under the CCPA on your behalf, please contact us <u>info@theinductor.com</u>, (877) 688-9633, or complete the web form located <u>here</u>. To verify your identity when you submit a request, we will match the identifying information you provide to us to the personal information we have about you.

Induction Innovations will not be required to comply with your request to delete your personal information if it is necessary for Induction Innovations to maintain your personal information in order to:

- 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 Induction Innovations
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity
- Debug to identify and repair errors that impair existing intended functionality
- 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
- 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
- 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
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with the Induction Innovations
- Comply with a legal obligation
- Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

Induction Innovations will not discriminate against you in the event you exercise any of the aforementioned rights under CCPA, including, but not limited to, by:

- Denying goods or services to you
- Charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties
- Providing a different level or quality of goods or services to you
- Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services

This Privacy Policy is available to consumers with disabilities.

## Service Providers

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

#### **Analytics**

We may use third-party Service Providers to monitor and analyze the use of our Service.

#### **Google Analytics**

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <a href="https://policies.google.com/privacy?hl=en">https://policies.google.com/privacy?hl=en</a>

Induction has no control or say over Google.

#### Google Ads

You can opt-out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the Google Ads Settings page: http://www.google.com/settings/ads

Google also recommends installing the Google Analytics Opt-out Browser Add-on – <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a> – for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <a href="https://policies.google.com/privacy?hl=en">https://policies.google.com/privacy?hl=en</a>

#### **Facebook**

You can learn more about interest-based advertising from Facebook by visiting this page: <a href="https://www.facebook.com/help/164968693837950">https://www.facebook.com/help/164968693837950</a>

To opt-out from Facebook's interest-based ads follow these instructions from Facebook: <a href="https://www.facebook.com/help/568137493302217">https://www.facebook.com/help/568137493302217</a>

Facebook adheres to the Self-Regulatory Principles for Online Behavioral Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the Digital Advertising Alliance in the USA <a href="http://www.aboutads.info/choices/">http://www.aboutads.info/choices/</a>, the Digital Advertising Alliance of Canada in Canada <a href="http://youradchoices.ca/">http://youradchoices.ca/</a> or the European Interactive Digital Advertising Alliance in Europe <a href="http://www.youronlinechoices.eu/">http://www.youronlinechoices.eu/</a>, or opt-out using your mobile device settings.

For more information on the privacy practices of Facebook, please visit Facebook's Data Policy: <a href="https://www.facebook.com/privacy/explanation">https://www.facebook.com/privacy/explanation</a> and update about CCPA: <a href="https://www.facebook.com/legal/policy/ccpa">https://www.facebook.com/legal/policy/ccpa</a>

Induction Innovations has no say or control over Facebook.

# **Links to Other Sites**

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit before clicking on any link. Induction has no control or say over such other sites.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

# Children's Privacy

Our Service does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

# **Changes to This Privacy Policy**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

If you have an account with us and a citizen of the EEA, we will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy if you have opted to receive such notifications and not called for the deletion of your data if you are a citizen of the EEA.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

# **Product Warranty**

With respect to any Product Warranties that Induction Innovations offers to its customers, unless otherwise stated by Induction in writing, warranties commence at Purchase of the Goods.

## **Contact Us**

If you have any questions about this Privacy Policy, please contact our Data Protection Officer (DPO), in one of the following ways:

• By email: <u>info@theinductor.com</u>

• By phone number: (877) 688-9633

• By mail: 1175 Jansen Farm Ct., Elgin, IL 60123, United States

End of Privacy Policy.