# REPUBLIG GROUP Privacy Policy



#### **INTRODUCTION**

Republic Technologies (NA) LLC ("Company" or "We"), headquartered at 2301 Ravine Way, Glenview, Illinois, USA, respects your privacy and is committed to protecting it through our compliance with this policy.

This policy describes the types of information We may collect from you or that you may provide when you visit the website (our "Website") and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information We collect:

- · on this Website;
- in email, text, and other electronic messages between you and this Website;
- when you interact with our advertising on third-party websites and services, if those advertising include links to this policy.

It does not apply to information collected by:

- us offline or through any other means, including on any other website operated by Company or any third party (including our affiliates and subsidiaries); or
- any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how We will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this privacy policy. This policy may change from time to time. Your continued use of this Website after We make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

#### **UNDER THE AGE OF 21**

Our Website is not intended for anyone under 21 years of age. No one under age 21 may provide any information to or on the Website. We do not knowingly collect personal information from anyone under age 21. If you are under 21, do not use or provide any information on this Website or through any of its features, use any of the interactive or public comment

features of this Website, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If We learn We have collected or received personal information from anyone under age 21, We will delete that information. If you believe We might have any information from or about anyone under age 21, please contact us at info@therepublicgroup.net.

# INFORMATION WE COLLECT ABOUT YOU AND HOW WE COLLECT IT

We collect several types of information from and about users of our Website, including the following types of information:

- information which can be used to specifically identify or contact you, such as your name, e-mail address, mail or shipping address, phone number, age, date of birth, and other demographic information about you ("personal information");
- information that is about you but individually does not identify you, such as your internet connection, the equipment you use to access our Website, usage details, Republic Group emails you open and/or forward, and Republic Group offers or links you connect to via emails;
- · information that relates to your interaction with us electronically, such as the type of mobile device you use, wireless carrier, IP addresses, the type of Internet browser you are using, the third-party website from which your visit originated, the operating system you are using, and the domain name of your Internet service provider.

We collect this information:

- · directly from you when you provide it to us;
- automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies;
- from third parties, for example, our business partners.



#### **INFORMATION YOU PROVIDE TO US**

The information We collect on or through our Website may include:

- information that you provide by filling in forms on our Website. This includes information provided at the time of registering to use our Website or posting material. We may also ask you for information from time to time, such as when you enter a contest or promotion sponsored by us, and when you report a problem with our Website.
- Records and copies of your correspondence (including email addresses), if you contact us;
- your responses to surveys that We might ask you to complete for research purposes.

## INFORMATION WE COLLECT THROUGH AUTOMATIC DATA COLLECTION TECHNOLOGIES

As you navigate through and interact with our Website, We may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website;
- information about your computer and internet connection, including your IP address, operating system, and browser type.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). See for information on how you can opt out of behavioral tracking on this website and how We respond to web browser signals and other mechanisms that enable consumers to exercise choice about behavioral tracking.

The information We collect automatically is only statistical and/or technical non-nominative data and does not include personal information, but We may maintain it or associate it with personal information We collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- · estimate our audience size and usage patterns;
- · recognize you when you return to our Website.

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- Tracking Technologies and Advertising: You can set the cookies module and/or your browser to manage your choices regarding all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
- Disclosure of Your Information for Third-Party Advertising: If you do not want us to share the personal information that you provided to Us with unaffiliated or non-agent third parties for promotional purposes, you can opt-out by sending us an email with your request to info@ therepublicgroup.net.
- Opt-in and Opt-Out of Communications: You may have the right to opt-in to or opt-out of certain of our uses and disclosures of your Personal Information. For example, when you are asked to provide Personal Information on this Site, you may have the opportunity to elect to, or not to, receive messages from us by e-mail. If you do not wish to have your email address used by the Company to promote our own or third parties' products, click "Unsubscribe" in email. Each email We send you contains an "UNSUBSCRIBE" link at the bottom of the email. Open your email, click "UNSUBSCRIBE", and follow the instructions on the screen to opt-out of communications.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt-in and, then, opt-out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

California and EU residents may have additional personal information rights and choices. Please see Your California Privacy Rights and EU Privacy Rights for more information.



# THIRD-PARTY USE OF COOKIES AND OTHER TRACKING TECHNOLOGIES

Some content including advertisements, on the Website are served by third-parties, ad networks and servers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

Since you have accepted third-parties tracking technologies, we do not control them nor how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see Choices About How We Use and Disclose Your Information.

#### **HOW WE USE YOUR INFORMATION**

We use information that We collect about you or that you provide to us, including any personal information:

- to present our Website and its contents to you;
- to provide you with information, products, or services that you request from us;
- to fulfill any other purpose for which you provide it;
- to notify you about changes to our Website or any products or services We describe on it;
- to allow you to participate in interactive features on our Website;
- to understand the form and manner in which you arrived on or were directed to our Website;
- to protect and enforce our Company's rights and intellectual property;
- to protect and enforce the commitments We have made to you regarding the type of information We gather and how We use it;
- in any other way We may describe when you provide the information;
- tor any other purpose with your consent;

We may also use your information to contact you about our own and third-parties' goods and services that may be of interest to you. If you do not want us to use your information in this way, please see Choices About How We Use and Disclose Your Information.

We may use the information We have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though We do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria. If you do not want us to use your information in this way, please see Choices About How We Use and Disclose Your Information.

#### **DISCLOSURE OF YOUR INFORMATION**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that We collect or you provide as described in this privacy policy:

- · to our subsidiaries and affiliates;
- to contractors, service providers, and other third parties We use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which We disclose it to them;
- to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by the Company about our Website users is among the assets transferred;
- to third parties to market their products or services to you if you have not opted out of these disclosures (for more information, see Choices About How We Use and Disclose Your Information);
- to fulfill the purpose for which you provide it (for example, if you give us an email address to



use the "email a friend" feature of our Website, We will transmit the contents of that email and your email address to the recipients);

- tor any other purpose disclosed by us when you provide the information;
- with your consent.

We may also disclose your personal information:

- to comply with any court order, law, or legal process, including to respond to any government or regulatory request;
- to enforce or apply our privacy policy, terms of use and other agreements;
- if We believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers, or others.

# CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- Tracking Technologies and Advertising: You can set the cookies module and/or your browser to manage your choices regarding all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
- Disclosure of Your Information for Third-Party Advertising: If you do not want us to share the personal information that you provided to us with unaffiliated or non-agent third parties for promotional purposes, you can opt-out by sending us an email with your request to info@ therepublicgroup.net.
- Opt-in and Opt-Out of Communications: You may have the right to opt-in to or opt-out of certain of our uses and disclosures of your Personal Information. For example, when you are asked to provide Personal Information on this Site, you may have the opportunity to elect to, or not to, receive messages from us by e-mail. If you do not wish to have your email address used by the Company to promote our own or third parties' products, click

"Unsubscribe" in email. Each email We send you contains an "UNSUBSCRIBE" link at the bottom of the email. Open your email, click "UNSUBSCRIBE", and follow the instructions on the screen to opt-out of communications.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt-in and, then, opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

California and EU residents may have additional personal information rights and choices. Please see Your California Privacy Rights and EU Privacy Rights for more information.

# ACCESSING AND CORRECTING YOUR INFORMATION

You may also send us an email at info@therepublicgroup.net to request access to, correct or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your user account. We may not accommodate a request to change information if We believe the change would violate any law or legal requirement or cause the information to be incorrect.

We have created mechanisms to provide you with the following control over your information. For more information, see Choices About How We Use and Disclose Your Information.

California residents may have additional personal information rights and choices. Please see Your California Privacy Rights for more information.

## **CALIFORNIA PRIVACY RIGHTS**

If you are a California resident and visit, use, and interact with our services, products and Website the following California Privacy Rights apply to you.



#### **Data Security**

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls.

Unfortunately, the transmission of information via the internet is not completely secure. Although We do our best to protect your personal information, We cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

# 1. Right to Know About personal information Collected, Disclosed, or Sold.

- You have the right to request that We advise you what personal information We collect, use, disclose, and sell that belongs to you.
- You may submit a verifiable consumer request to obtain the specific personal information We have collected about you by emailing us at info@therepublicgroup.net. We will verify your request by checking the information We hold against what has been submitted.
- As set forth in our primary privacy Policy, We collect several types of information about you when you visit and use our Website.
- Personal information has been collected from the sources set forth in the primary privacy policy and may have been disclosed and shared as set forth in the primary privacy policy.

# 2. Right to Request Deletion of personal information.

- You have a right to request the deletion of your personal information if We have collected or maintained it in the past 12 months.
- You may submit a verifiable consumer request to delete your information by emailing us at info@therepublicgroup.net. We will verify your request by checking the information We hold against what has been submitted.
- Once We receive and confirm your verifiable consumer request, We will disclose to you the following:
- The categories of personal information We collected about you.



- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom We shared that personal information.

# 3. Right to Opt-Out of the Sale of personal information.

You have the right to opt-out of any sale of your personal information.

You can unsubscribe from receiving our e-mails at any time. You can unsubscribe by clicking on the "Unsubscribe" link in the footer of our emails and following the instructions. You can also unsubscribe by clicking on the "Unsubscribe" link on this site and following the instructions.

# 4. Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights.

You have a right not to receive discriminatory treatment by us for the exercise of these privacy rights conferred by the California Consumer Privacy Act. As such, We will not deny you goods or services, provide you a different level or quality of goods or services, or recommend a different level or quality of goods or services.

#### 5. Authorized Agent.

Only you or a person that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. Please contact us at info@therepublicgroup.net to designate an authorized agent.

#### 6. Contact Us.

Contact us for more information or with any questions by emailing us at info@ therepublicgroup.net

## 7. Limitations on Requests.

You may only make a verifiable consumer request for access twice within a twelve (12) month period. The verifiable consumer request must: (a) provide sufficient information that allows us to reasonably verify you are the person about whom We collected personal information or your authorized agent; (b) describe your request with sufficient detail that allows us to properly understand, evaluate, and respond



to you; (c) We cannot respond to your request or provide you with personal information if We cannot verify your identity or authority to make the request and confirm the personal information relates to you; (d) making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

8. Response Time and Response Format.

We make every effort to respond to a verifiable consumer request within forty-five (45) days of its receipt. If We require more time (up to 90 days), We will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. Any disclosures We provide will only cover the twelve (12) month period preceding the verifiable consumer request's receipt. The response We provide will also explain the reasons why We cannot comply with a request, if applicable. We will provide our response in a manner that is readily usable and should allow you to transmit

the information from one entity to another entity without hindrance to you.

#### **EU PRIVACY RIGHTS**

If you are an EU resident and visit, use, and interact with our services, products and Website the following EU privacy Rights apply to you.

Legal basis and data retention periods of the data treatments.

On a general assessment, the Republic Group commits itself to process the Personal data:

- · for specified, explicit and legitimate purposes;
- · with valid legal basis;
- and to set forth retention periods in accordance with the purpose for which Personal data are collected and in accordance with the legal obligations (laws and regulations may set a minimum period during which the Republic Group must retain Personal data)

#### IN PARTICULAR, WE ARE PROCESSING TO THE FOLLOWING DATA TREATMENTS ACTIVITIES:

| PURPOSE                                    | DETAILED PURPOSE<br>(if necessary)                                     | LEGAL BASIS         | RETENTION PERIOD   |
|--|--|---------------------|--|
| Communication and promotion operations     | Necessary cookies  | Legitimate interest | Most of the cookies used by the Republic Group's Websites are "session cookies" (they are automatically erased at the end of each visit), but various retention period may apply depending on the kind of cookies with a maximum of 13 months (retention periods are detailed within the cookie module). |
|  | Non-necessary cookies  | Consent             |  |
|  | Moderation of our social media pages                                   | Legitimate interest | As long as it is made available by the social media  |
|  | Digital prospection operation to physical persons (as the case may be) | Consent             | As long as the physical person does not unsubscribe  |
| Website security management                | -  | Legitimate interest | 6 months (maximum)   |
| Anti-counterfeit program & web-application | On a general basis   | Legitimate interest | 24 months  |
|  | For some data-treatments where the customer's participation is needed  | Consent             |  |



#### THE RIGHTS RELATED TO PERSONAL DATA

In compliance with the regulatory provisions, the Republic Group ensures that appropriate measures are taken to provide any mandatory information to EU residents whose Personal data are processed, in a concise, transparent, comprehensible and easily accessible way.

When the Republic Group collects, uses or stores Personal data, EU residents whose Personal data are processed has these rights, which, in most cases, may be exercised free of charge:

- The right to receive information regarding the processing of, and the access to, Personal data held by the Republic Group; the purposes of the processing, the types of Personal data involved; the addressees or categories of addresses to which Personal data were transmitted; and the duration of retention of Personal data when such is feasible.
- The right to withdraw at any time one's consent to the processing of Personal data. However, it is specified that, notwithstanding the withdrawal of consent, the Republic Group has the right to process Personal data if there is a legitimate reason for doing so. For example, it may be necessary to retain Personal data in order to comply with a legal obligation. Also, the lawfulness of the data processing up to the time of the revocation is not affected thereby.
- In some circumstances, the right to receive certain Personal data that are automatically processed – based on consent or in execution of a contract – and are transmitted to the user or a third party in a standard and machinereadable format. It is understood that the transfer of Personal data to another Processing controller, upon a user's request, may occur only when it is technically feasible to do so.
- The right to ask the Republic Group to rectify Personal data if they are inaccurate or incomplete.
- The right to ask the Republic Group to delete Personal data in some circumstances. However, there may be situations when a request to delete Personal data cannot be satisfied because the Republic Group is legally required to retain them or is authorized to refuse such a request.
- The right to oppose, or request a restriction of, the processing of Personal data in some circumstances. However, there may be situations when a request for opposition or restriction of the processing of Personal data

cannot be satisfied because the Republic Group is legally required to retain them or is authorized to refuse such a request.

These rights may be exercised by sending a request by e-mail to the following address: privacy@rpb-tech.com

In addition, you may at any time send to the aforementioned e-mail address any questions relating to the exercise of the aforementioned rights and, more generally, any questions relating to the processing of Personal data by the Republic Group.

To be valid, a request must contain an electronic copy of the national identity card or passport as documentation of the applicant's identity. A request for the exercise of rights, insofar as it is validly submitted, is processed within one month of the receipt thereof.

Each EU resident whose Personal data are processed by the Republic Group has also the right to file a complaint with the competent supervisory authority.

The competent supervisory authority regarding the data protection legislation is the lead supervisory authority – i.e. the authority that falls within the jurisdiction of the Republic Group's head office in accordance with article 56.1 of the GDPR; or, if applicable, the competent supervisory authority in the country where the Republic Group's entity operating the website and processing Personal data is located, in accordance with article 56.2 of the GDPR.



# THE LIST OF COMPETENT AUTHORITIES IS PROVIDED BELOW:

## 1. Lead supervisory authority:

#### France:

Commission Nationale de l'Informatique et des Libertés 3 place de Fontenoy – TSA 80175 75334 Paris Cedex 07 (France) Tel: +33 1 53 73 2222

## 2. National supervisory authorities:

#### **Germany**

Der Budesbeauftragte für den Datenschutz und die Informationsfreiheit Husarenstraße 30 D-53117 Bonn (Germany)

#### **Austria**

Österreichische Datenschutzbehörde Wickenburgasse 8 1080 Vienna (Austria)

#### **United Kingdom**

Information Commissioner's Office (ICO) Wycliffe House Water Lane Wilmslow Cheshire SK0 5 AF (United Kingdom)

## **Spain**

Agencia Española de Protección de Datos C/Jorge Juan 6 28001 Madrid (Spain)

#### **CHANGES TO OUR PRIVACY POLICY**

It is our policy to post any changes We make to our privacy policy on this page with a notice that the privacy policy has been updated on the Website home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring We have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

#### **CONTACT INFORMATION**

To ask questions, complains, concerns, or comments, contact us at info@therepublicgroup. net.

