

GROUPE SEB USA PRIVACY POLICY

Updated and Effective: October 1, 2020

Groupe SEB USA is committed to protecting your privacy. Groupe SEB USA operates various brands in the United States. This Privacy Policy applies to any website that posts a link to this Privacy Policy (“Website”), such application, feature or other online service owned or controlled by Groupe SEB USA, a subsidiary of SEB SA, as well as any offline service (collectively the “Services”). In this Privacy Policy, “we,” “our,” and “us” refers to Groupe SEB USA.

This Privacy Policy describes the information that we may collect from you during your visit to our Services, how we use the information, and how we protect the information which you opt to provide during your visit. In addition, the Privacy Policy provides important information about your rights with respect to your personal information.

By using our Services, or by sharing your information with us, you are accepting and consenting to the practices described in this Privacy Policy. **IF YOU DO NOT AGREE TO THE TERMS OF THIS PRIVACY POLICY AND THE APPLICABLE TERMS OF USE, DO NOT ACCESS OR USE THE SERVICES OR PROVIDE PERSONAL INFORMATION TO US.**

This Privacy Policy explains:

1. HOW WE GATHER INFORMATION ABOUT YOU
2. WHAT INFORMATION WE COLLECT
3. COOKIES AND SIMILAR TECHNOLOGY
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1. HOW WE GATHER INFORMATION ABOUT YOU

We may receive or gather personal information about you in a variety of ways, including the following:

- **Directly from you.** When you contact us, normally via our Website or other services including when you contact our customer service teams to make an inquiry; when you create an account; when you purchase or register a product; when you leave a product review; when you elect to receive marketing communications from us; when you follow us on social media; when you participate in promotional gift offers; and when you complete our survey questionnaires.
- **Cookies and Other Technology.** Automatically as you navigate through the Services.
- **Other Third Parties.** We may collect personal information about you from other sources such as our marketing partners.

2. WHAT INFORMATION WE COLLECT

When you visit the Website or use the Services, we may collect information about you, including Personal Information. “Personal Information” means information that identifies or relates to you, or as defined under applicable law. The following identifies the categories of personal information we collect directly from you (or about you) and how we collect such data the following types of personal information about you:

- **Contact Information:** your first and last name, postal address, email address, and phone number when you complete an online form or create an account on our Website;
- **Other Identifying Information:** IP address and other unique online identifiers, social media user names;
- **Financial Information:** credit card, debit card and bank account information;
- **Demographic Information:** gender, professional or employment information, education status, for example when you apply for a position with us or elect to complete a survey;
- **Geolocation data;**
- **Internet or Other Electronic Activity:** your browsing and click history, including information about how you navigate within our Website;
- **Commercial Information:** products purchased or viewed on our Website;
- **Audio Information:** such as when you call customer support; and
- **Inferences drawn from the categories described above in order to create a profile about you to reflect your preferences, characteristics, behavior and attitude.**

As with many other websites and applications, as you navigate through and interact with our Website or Services, 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 or Services, including details of referring websites (URL), traffic data, location data, logs, language, date and time of access, frequency, and other communication data and the resources that you access and use of the Services.
- Information about your computer and Internet connection, including your IP address, operating system, host domain, and browser type.

The information we collect automatically includes statistical data and may also include personal information. We may also maintain it or associate it with personal information you provide to us or that we collect in other ways or receive from third parties. It helps us to improve our Services and to deliver a better and more personalized service, including by enabling us to:

- Estimate how individuals access and use our Services.
- Store information about your preferences.
- Speed up your searches.
- Recognize you when you return to our Services.

Cookies. Like many other websites, we use cookies and other technologies to help us deliver content specific to your interests, to process your requests, and/or to analyze your visiting patterns. Cookies are small data files stored on your own computer's hard drive. They are generated by the Website. By assigning and storing a unique user name cookie on your device, we are able to offer you personalized collection, filtering and delivery of information that we feel will be of value to you, and we are able to save you the trouble of re-entering your contact information each time you visit the Website. If you choose to reject cookies, you may still use our Website, although certain functions and applications may be disallowed or not fully functional.

Here is some information about the different categories of cookies we may use:

- Strictly Necessary Cookies. These cookies are essential to make this Website work. They enable you to move around this Website and use its features. Without these cookies, services that are necessary for you to be able to use the Website cannot be provided.
- Performance Cookies. These cookies collect information about how you have used a website, such as which pages are visited the most often, how people are moving from one link to another, and if they get error messages from certain pages. Overall, these cookies provide analytical information about how a website is performing and how the publisher can improve it.
- Social Media Cookies. To enhance your internet experience and make the sharing of content easier, some of the pages on this Website may contain links to third party social media service providers, such as Facebook, Twitter, or Pinterest. Through these links, the

social media service provider may set its own cookies on your computer or device. We do not control these cookies and you should check the social media service provider's website for further details about how they use cookies.

- **Targeting Cookies.** Some companies allow their advertising partners or other third party partners to use this type of cookie to deliver advertising that is relevant to your interests. These cookies can remember that your computer or device has visited a site or service, and may also be able to track your device's browsing activity on other sites.

The length of time a cookie stays on your computer or device varies depending on whether it is a "persistent" or "session" cookie. Persistent cookies remain on your hard drive until you erase them or they expire. How long a persistent cookie remains on your browser depends on how long the visited website has programmed the cookie to last. Session cookies are temporary and are erased when you close your browser at the end of your surfing session. The next time you visit that particular site, it will not recognize you and will treat you as a new visitor.

We may use cookies or other tracking technologies to collect information about your online activities over time and across third-party websites or other online services for online behavioral advertising.

Click Stream Tracking. We also employ "click stream tracking." Clickstream or clickstream data reflect the specific web pages visited by an individual user, and the manner or traffic pattern by which a user moves from one page to another. We track and use this information to analyze trends, to understand how our users' habits are similar to or different from one another, to personalize the content, ads and promotions that you and other users see on our Website, and to administer the Website.

Online Advertising and Analytics Providers. We work with third-party network advertisers, ad agencies, analytics service providers, and other vendors to provide advertisements on third-party websites and elsewhere online and to provide us with information about web traffic on our Website. These service providers may set their own tracking technologies on your device (including cookies and web beacons) and may otherwise collect or have access to information about you (such as usage information and device identifier). We also use Google Analytics, among other search engine tools, to analyze how the Website is used and to monitor its performance. We use the data gathered to diagnose and correct technical issues with the Website and to make improvements based on what users find most interesting or useful. To learn more about how to adjust your settings and the choices available to you, please visit Section 10 below.

Social Media Plug-Ins. We offer social media plug-ins for companies that include Facebook, Twitter, YouTube, and Instagram. For example, we have Facebook like and share buttons, a tweet button for Twitter, and embedded videos that offer certain interactive features and we and the company track your interactions with these functions. Additionally, even if you do not choose to use these plug-ins, the relevant company may still collect certain tracking information about you and share it with us.

We may combine information we receive from other sources with information you give to us and information we collect about you. Depending on the types of information received, we will use the information received from other sources or the combined information for the purposes described in Section 3 (How We Use Your Information).

Cross-Device Tracking. We use data analytics companies, advertising networks, or social media companies, and the features they offer, to engage in “cross-device tracking,” which occurs when platforms, publishers, and advertising technology companies try to connect a consumer's activity across smartphones, tablets, desktop computers, and other connected devices. The goal of cross-device tracking is to enable companies to link a consumer’s behavior across devices.

3. HOW WE USE YOUR INFORMATION

We collect and use your personal information for different purposes, including in the following ways:

- To identify you when you contact us, and give you the best answer to your questions;
- To provide or manage any information, products and services requested;
- For general administration purposes;
- To identify other products and services which might be of interest to you and to inform you about our products and services;
- To send you by marketing e-mails and other materials, either electronically or in hard copy format, to help you enjoy the products you have purchased from us (which may include telephone, voicemail, email, SMS/text messages, or notifications within the Website);
- To complete any registration or other transactions or actions you request online, such as payment processing, including determining eligibility, use, and other benefits;
- To administer your account, including processing your payments and fulfilling your orders;
- To operate the Services and perform any services associated with the Services, including providing you with technical support and to improve the Services and our products and services;
- To create de-identified information that cannot be used to personally identify you, such as aggregate statistics relating to the use of our service;
- To measure or understand the effectiveness of communications (including advertising) that we send to you and others, and to deliver relevant communications to you and to provide you with communications from us, surveys, newsletters, and other information;

- To enhance the safety and security or performance of our products and services. This includes verifying your identity, preventing or detecting fraud or other unauthorized or illegal activities;
- To design, develop, and communicate with you about our new features, products, and services, or, subject to any consents or authorizations that are required by applicable law, those of our subsidiaries, affiliates, and parent company and any of their related businesses and those of our third-party partners;
- To notify you about changes to our services or the Website;
- To enforce this Privacy Policy and any other terms that you have agreed to, including to protect the rights, property, or safety of us or any other person, or the copyright-protected content of the Services;
- For any purpose where you have given your consent (where legally required); and
- To comply with applicable federal, state, and other laws and regulations;

We use the personal information you provide to respond to your inquiries on the Services, to facilitate your purchases on the Services. We also reserve the right to store your personal information for our own internal purposes, including list management and demographic matching with other database information.

4. HOW WE SHARE YOUR INFORMATION

We may share your personal information we collect from you in connection with the Services with the following third parties:

- Our service providers who perform services on our behalf, such as credit card processors, suppliers who provide technology services and solutions, and data management firms or logistic support. The service providers(s) are subject to contractual and other legal obligations to preserve the confidentiality of your information and to respect your privacy, and they will only have access to and use the data they need to perform their functions.
- To provide information for legal or regulatory purposes.
- For the purpose of preventing fraud/loss, for example to fraud prevention agencies.
- To a prospective or actual buyer of our company in the event of a takeover, such as a merger, acquisition or divestitures.

We also may share aggregate or de-identified information about users with third parties for marketing, advertising, research or similar purposes.

5. HOW WE PROTECT YOUR INFORMATION

We are dedicated to the security of your personal information, and we take commercially reasonable precautions to maintain that protection. We use physical, electronic and managerial processes and procedures to attempt to protect the personal information we collect on and offline. Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted to our Services; any transmission is at your own risk.

We do not store your full bank data or credit card information on our servers. All bank data and credit card information is processed by our outside financial services provider, Adyen, and all transmissions or transfers of such financial data shall be done only with SSL Secure Lock data security protection.

6. CHILDREN'S PRIVACY PROTECTION

Our Services are designed and intended for adults. To protect children's personal information, we do not knowingly collect personal information from children under the age of thirteen (13) that can be used to specifically identify them and we do not permit persons under the age of thirteen (13) to use the Services. If you are a parent or guardian of a child under the age of thirteen (13) and believe that he or she has disclosed personal information to us, please contact us using the information listed in the "Contact" section below. You may review and request the deletion of your child's personal information or prohibit the further use of such information.

7. PERIOD OF RETENTION AND USE

We will retain the collected personal information only for as long as is reasonably necessary taking into consideration our need to answer queries or resolve problems, provide improved and new services and comply with legal requirements under applicable law(s). This means that we may retain your personal information for a reasonable period after you stop using the Website or Services offered thereunder. After this period, your personal information will be deleted from all our systems.

8. ACCESSING, CHANGING, OR DELETING YOUR PERSONAL INFORMATION

You may access to your personal information and change them under the *my personal information* in your account. If you wish to delete your personal information, please contact us at + 1-800-255-2523 or allcladusalegal@groupeseb.com.

9. FOR CALIFORNIA RESIDENTS

If you are a California resident, the California Consumer Privacy Act (“CCPA”) requires us to make certain disclosures about our personal information practices and provides you additional rights related to our collection, use, and sale of your personal information.

A. Notice of Collection

We collect the following categories of personal information about you and use the personal information for the following business or commercial purposes. We obtain this information directly from you, automatically as you navigate through the Services, or receive it from third-party sources.

Categories of Personal Information Collected	Personal Information	Purpose for Collecting Personal Information
Identifiers	<ul style="list-style-type: none"> • Name • Alias • Email address • Phone number • Postal address • Account name and password 	<ul style="list-style-type: none"> • Product purchase • Product registration • Newsletters and email promotions • Customer service • Product reviews • Gift offers and promotions • Creating account • Social media • Targeted advertising • Marketing and analytics • Improving products and services • Tracking website referrals to third-party retailers • Website personalization
Categories described in California Code Section 1798.80(e)	<ul style="list-style-type: none"> • Credit or debit card information 	<ul style="list-style-type: none"> • Product purchase • Customer service
Characteristics of Protected Classifications under California or Federal Law	<ul style="list-style-type: none"> • Gender • Race 	<ul style="list-style-type: none"> • Survey questionnaires for marketing

Commercial Information	<ul style="list-style-type: none"> • Products or services purchased, obtained or considered • Purchasing or consuming histories or tendencies 	<ul style="list-style-type: none"> • Product purchase • Product registration • Newsletters and email promotions • Customer service • Product reviews • Gift offers and promotions • Creating account • Social media • Targeted advertising • Marketing and analytics • Improving products and services • Tracking website referrals to third-party retailers • Website personalization
Internet/Network Activity	<ul style="list-style-type: none"> • Internet protocol (IP) address • Device identifier • Mobile ad identifiers • Cookie ID • Beacons • Pixel tags • Customer number • Interaction with a website, application, or advertisement • Browsing history • Search history 	<ul style="list-style-type: none"> • Newsletters and email promotions • Creating account • Social media • Targeted advertising • Marketing and analytics • Improving products and services • Tracking website referrals to third-party retailers • Website personalization
Geolocation Data	<ul style="list-style-type: none"> • Approximate location. 	<ul style="list-style-type: none"> • Targeted advertising • To give information or provide a service appropriate to your location.
Audio and Electronic Information	<ul style="list-style-type: none"> • Call recordings • Chat transcripts 	<ul style="list-style-type: none"> • Customer service • Quality assurance and training
Professional/ Employment-Related Information	<ul style="list-style-type: none"> • Employment status • Professional or employment-related information 	<ul style="list-style-type: none"> • Survey questionnaires for marketing • Customer service

		<ul style="list-style-type: none"> • Improving products and services • Marketing and analytics
Education Information	<ul style="list-style-type: none"> • Education status 	<ul style="list-style-type: none"> • Survey questionnaires for marketing • Marketing and analytics
Inferences Based on Profiling	<ul style="list-style-type: none"> • Preferences, characteristics, psychological trends, behavior, attitudes 	<ul style="list-style-type: none"> • Survey questionnaires for marketing • Newsletters and email promotions • Targeted advertising • Marketing and analytics • Improving products and services • Website personalization

B. California Privacy Disclosures

In the past twelve (12) months, we have disclosed certain categories of personal information about you to third parties (such as our service providers) for a business or operational purpose.

Categories of Personal Information	Categories of Third Parties
Identifiers	<ul style="list-style-type: none"> • Financial services vendors • Supplier vendors • Service providers (technology and communications providers, storage and hosting providers, market research and customer service, sales support, fraud prevention, etc.) • Social media partners and advertising networks • Data analytics providers
Categories described in California Code Section 1798.80(e)	<ul style="list-style-type: none"> • Financial services vendors • Service providers (technology and communications providers, storage and hosting providers, market research and customer service, sales support, fraud prevention, etc.)
Characteristics of Protected Classifications under California or Federal Law	<ul style="list-style-type: none"> • Service providers (technology and communications providers, storage and hosting providers, market research and customer service, sales support, fraud prevention, etc.)
Commercial Information	<ul style="list-style-type: none"> • Financial services vendors • Retail partners

	<ul style="list-style-type: none"> • Supplier vendors • Service providers (technology and communications providers, storage and hosting providers, market research and customer service, sales support, etc.) • Social media partners and advertising networks • Data analytics providers
Internet/Network Activity	<ul style="list-style-type: none"> • Service providers (technology and communications providers, storage and hosting providers, market research and customer service, sales support, fraud prevention, etc.) • Internet service providers • Social media partners and advertising networks • Data analytics providers
Geolocation Data	<ul style="list-style-type: none"> • Service providers (technology and communications providers, storage and hosting providers, market research and customer service, sales support, etc.) • Social media partners and advertising networks
Audio and Electronic Information	<ul style="list-style-type: none"> • Service providers (technology and communications providers, storage and hosting providers, market research and customer service, sales support, fraud prevention, etc.)
Professional/ Employment-Related Information	<ul style="list-style-type: none"> • Service providers (technology and communications providers, storage and hosting providers, market research and customer service, sales support, fraud prevention, etc.)
Education Information	<ul style="list-style-type: none"> • Service providers (technology and communications providers, storage and hosting providers, market research and customer service, sales support, fraud prevention, etc.)
Inferences Based on Profiling	<ul style="list-style-type: none"> • Service providers (technology and communications providers, storage and hosting providers, market research and customer service, sales support, fraud prevention, etc.)

We may also share all categories of personal information as part of corporate transactions, such as mergers, acquisitions, or divestitures. We may be required to share all categories of personal information with law enforcement, regulatory agencies, or litigants based on enforceable requests for this information, or to exercise our legal rights.

Groupe SEB USA does not sell your personal information for monetary gain. Like many organizations, we engage third parties to help us deliver interest-based advertisements to you and may make use of third-party tracking technologies or other online marketing services. In doing so, we may make available or transfer your personal information (e.g., identifiers such as your IP address, geolocation data, and Internet or other similar network activity) to third parties, such as advertising agencies, advertising services, sponsored content providers, social media platforms, and other similar technology companies. These companies may use information about your activities on the Services – and other websites and services you visit across the various devices you use – to recognize you and your devices across the internet and to provide you targeted advertising based upon your interests. Making such personal information available to these entities may constitute a “sale” of data under the CCPA. Please see your California Privacy Rights and Section 10 (Your Choices) for more information on how you can adjust your preferences.

We do not knowingly sell the personal information of individuals under the age of sixteen (16).

C. California Privacy Rights

If you are a California resident, the CCPA gives you certain rights concerning your personal information.

- **Right to know:** You have the right to request that we provide what personal information about you we collect, use, disclose, and sell. This includes the right to request that we provide to you the specific pieces of personal information we have collected about you in the past 12 months.
- **Right to delete:** You have the right to request that we delete certain personal information that we have about you. We may not be able to fulfill your request if we (or our service providers) need to retain your personal information for certain authorized purposes, such as to provide a good or service you requested, to secure our Services, to protect against fraud, to improve our Services, or to comply with or exercise rights under applicable law.
- **Right to opt out of sale:** You have the right to request that we not “sell” your personal information. The term “sale” is defined broadly under the CCPA. To the extent that “sale” under the CCPA is interpreted to include interest-based advertising and similar data uses, you may stop this use of your personal information by adjusting your device or browser’s settings to limit how your online usage and device data is shared with third parties. You can refuse the installation of optional third-party cookies through your browser settings, and you may even be able to direct your browser to prevent the installation of third-party cookies by default. For your information on how to adjust your settings to opt out of these third-party cookies, please see Section 10 (Your Choices) below.
- **Right to non-discrimination:** You have the right not to receive discriminatory treatment from us based on your exercising of any privacy rights conferred by the CCPA.

D. How to Exercise Your CCPA Privacy Rights

To exercise your rights, contact us at the contact details provided in Section 14 (Contact Us) below.

To make a **request to know or request to delete** your personal information, we may need to verify your identity (and if applicable, your agent's authority to make the request on your behalf) before we are able to process your request. Only you or an authorized agent acting on your behalf have the ability to make the request related to your personal information.

To do so, we will ask you for certain information to verify your identity, such as your name, address and e-mail address. We also may contact you by e-mail to verify your identity and ask you additional questions, such as your last order with us so that we can match your identity with the personal information we have about you. In some instances, we may ask you to declare under penalty of perjury that you are the consumer whose personal information is the subject of the request.

If you have an authorized agent who makes the request, then (i) we need proof that you have provided the agent power of attorney; or (ii) you must provide the agent signed permission to submit a request to know or delete; you must verify your identity directly with us; or you must confirm with us that you provided the authorized agent permission to submit the request.

If we cannot verify your identity, or cannot confirm the agent's authority to act on your behalf, we are not required to fulfill your request.

You also have the right to **request to opt out of the sale** of your personal information. As explained above, the term "sale" is defined broadly under the California Consumer Privacy Act. For more information on how to adjust your settings to opt out of third-party cookies, please see Section 10 (Your Choices) below.

10. 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 control over your information:

Tracking Technologies and Advertising. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of our Services may then be inaccessible or may not function properly.

Opt Out Tools: You can also learn more about the options available to you to limit third party advertisers that use tracking or targeting tools in connection with our Website:

- Opt Out of Interest Based Advertising (National Advertising Initiative);
- Your Ad Choices (Digital Advertising Alliance);
- Your Online Choices (European Interactive Digital Advertising Alliance);

- For mobile add users, check out participating members of the Digital Advertising Alliance by installing the AppChoices mobile app and selecting the user’s choices.

Google Analytics: You can opt-out by visiting [Google Analytics Opt-out Browser Add-on](#).

Do Not Track. Do Not Track is a privacy preference that You can set in Your web browsers. When You turn on the Do Not Track signal, the browser sends a message to websites requesting them not to track the user. At this time, we do not respond to Do Not Track browser settings or signals. For information about Do Not Track, please visit: www.allaboutdnt.org.

Promotional Offers from us. If you do not wish to receive marketing emails, you can click “unsubscribe” in the bottom of the email. You can also always exercise your right to ask us not to process your personal information for marketing purposes by contacting us at the address below.

Text Messages and SMS. To opt out of text messages, reply STOP to the message you received.

11. THIRD-PARTY LINKS

The Services may contain links to other sites. **PLEASE BE AWARE THAT WE ARE NOT RESPONSIBLE FOR THE PRIVACY PRACTICES OF SUCH OTHER SITES.** We encourage you to be aware when you leave the Services and to read the privacy statements of each and every web site that collects personally identifiable information. This Privacy Policy applies solely to information collected by the Services.

12. REVISIONS TO THE PRIVACY POLICY

You also acknowledge our right to change this Privacy Policy, without prior notification, and our commitment to post any such changes on this page so that you are fully informed of the types of information we collect, how we use it, and under what circumstances, if any, it is disclosed. Your continued use of our Services after such amendments will be deemed your acknowledgement of these changes to this Privacy Policy.

13. INTERNATIONAL USERS

Your personal information may be transferred to and/or stored in any country where we conduct business, which includes outside the United States. By using our Services or by otherwise providing information to us, you understand that the information from or about you or your use of our Services may be transferred to and/or stored in countries outside of your country of residence, including to the United States.

14.CONTACT US

For any questions, please contact us at:

Phone: 1-800-255-2523

E-mail: allcladusalegal@groupeseb.com

Mail: Attention: Customer Service
Groupe SEB USA
5 Wood Hollow Rd. - 2nd Floor
Parsippany, NJ 07054