

Privacy Policy

Effective Date: June 29, 2023

Master-Halco, Inc. (“Master Halco”) is committed to protecting the privacy and security of the information we collect and to being transparent about the ways in which we collect and process your information. This statement (the “Privacy Policy”) sets forth our policies and practices for handling the information we collect from or about you. It applies to the websites and online services that we operate and that link to this Privacy Policy (the “Services”).

I. COLLECTION OF INFORMATION

We collect the following categories of information when you use our Services:

- Information you provide directly to us.
 - **Contact Information**, including real name, alias, email address, telephone or mobile phone number, postal address and social security number;
 - **Sign-In Information**, including username and password, account name, account number;
 - **Commercial information**, including records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies;
 - **Geolocation data**, including geolocation information derived from your IP address and other device information;
 - **Transaction and Billing Data**, including financial account and payment card details, (credit card number, expiration date, and credit card security code, where needed to complete a transaction), billing address, account balances; and
 - **Correspondence you send to us.**
- Information we collect automatically. We collect internet, electronic activity, and other information automatically from the devices and browsers that you use, including your device type; Internet protocol (IP) address; device and advertising identifiers, probabilistic identifiers, and other unique personal or online identifiers; time zone setting and location; browser type and version; operating system and platform; pages that you visit before and after using the Services, browsing history, and search history information about the links you click, pages you view, and advertising you interact with within the Services and other information about how you use the Services. If you or your device experiences an error, we collect information about the error, the time the error occurred and the feature being used.

We also receive the categories of information described above from other sources, including from users of our Services and third-party services and organizations. For example, if you access

any social media or similar services through the Services to login or to share information about your experience on our Services with others, we may collect information from these third-party services.

Without this information, we are not able to provide you with all the requested services, and any differences in services are related to your information.

We may aggregate or de-identify the information described above. Aggregated or de-identified data is not subject to this Privacy Policy.

II. USE OF INFORMATION AND PURPOSE OF DATA PROCESSING

We use and otherwise process each of the categories of information identified above for the following business purposes:

Purpose/Activity	In jurisdictions that require a lawful basis for processing, the lawful basis for processing, including basis of legitimate interest
<p>To provide you with the information, products and services that you request from us; to allow you to participate in interactive features of our Services, when you choose to do so; to manage accounts; and to manage our relationship with you, including providing you with the information, products and services that you request from us, and notifying you about changes to our terms or Privacy Policy.</p>	<p>(a) Performance of a contract with you (b) Necessity to comply with a legal obligation (c) Necessity for our legitimate interests (for instance, to keep our records updated)</p>
<p>To make suggestions and recommendations to you about things that are similar to those that you have enquired about or may otherwise be of interest to you, to send promotional and/or informational materials from us or by our affiliates and trusted business partners via mail and e-mail.</p>	<p>Necessity for our legitimate interests (for instance, to grow our business)</p>
<p>To improve our Services and to ensure that content is presented in the most relevant and effective manner for you and for your device; to administer our Services, including troubleshooting, data analytics, testing, research, statistical and survey purposes; to keep our Services, business and users safe and secure; to notify you about changes to our terms or Privacy Policy; to comply with applicable laws and regulations; and to protect or exercise our legal rights or defend against legal claims.</p>	<p>(a) Necessity for our legitimate interests (for instance, for running and protecting our business; for provision of administration and IT services; for network security and to prevent cybercrime and fraud; in the context of a business reorganisation or group restructuring exercise; to study how people use our Services, to develop the Services, to keep our Services updated and relevant, to grow our business and to inform our communications strategy)</p>

Where legally required and we have no other valid legal basis to process your information, we will obtain consent (for example, to provide you with marketing information or share information with third parties), which may subsequently be withdrawn at any time by [contacting us](#). Withdrawing consent does not affect the lawfulness of processing based on consent before it is withdrawn.

Where we need to collect information by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may cancel a product or service you have with us.

III. DISCLOSURE OF INFORMATION

We are committed to maintaining your trust, and we want you to understand when and with whom, and under what circumstances we may share the information we collect.

- Authorized third-party vendors and service providers. We may share contact information, sign-in information, commercial information, geolocation data, transaction and billing data, correspondence you send to us and data that we automatically collect with third-party vendors and service providers that provide services to us for a variety of business purposes, such as customer service, email deployment, advertising and marketing, security and performance monitoring, maintaining or servicing accounts, processing or fulfilling orders and transactions, verifying customer information, research, data hosting, auditing, and data processing.
- Corporate affiliates. We may share contact information, sign-in information, commercial information, geolocation data, transaction and billing data, correspondence you send to us and data that we automatically collect with our corporate affiliates.
- Business transfers. We may share contact information, sign-in information, commercial information, geolocation data, transaction and billing data, correspondence you send to us and data that we automatically collect in connection with a substantial corporate transaction, such as the sale of a website, a merger, consolidation, asset sale, initial public offering, or in the unlikely event of bankruptcy.
- Legal purposes. We may disclose contact information, sign-in information, commercial information, geolocation data, transaction and billing data, correspondence you send to us and data that we automatically collect to respond to subpoenas, court orders, legal process, law enforcement requests, legal claims or government inquiries, and to protect and defend the rights, interests, safety, and security of Master Halco, our affiliates, users, or the public.
- With your consent. We may share information for any other purposes disclosed to you at the time we collect the information or pursuant to your consent.

If you access third-party services such as social media services or third-party single-sign on tools, through the Services, these third-party services may be able to collect information about you,

including information about your activity on the Services, and they may notify your connections on the third-party services about your use of the Site, in accordance with their own privacy policies.

If you choose to engage in public activities on the Services, you should be aware that any information you share there can be read, collected, or used by other users of these areas. You should use caution in disclosing information while participating in these areas. We are not responsible for the information you choose to submit in these public areas.

Personal information is not shared for money, but certain uses may be deemed the “sale” or “sharing” of personal information under applicable privacy laws.

In the twelve months since this Privacy Policy took effect, for commercial purposes, we have processed or shared for cross-context behavioral advertising the following categories of information to analytics providers, social media, advertisers and other vendors for cross-context behavioral advertising: contact information, commercial information, geolocation data, correspondence you send to us and data that we automatically collect.

Master Halco uses or discloses sensitive personal information for the following purposes only: providing the products and services you request, as well as improving those offerings; operating and overseeing our business; protecting rights and interests; short-term transient uses; and for purposes that do not infer characteristics about consumers.

IV. ADVERTISING, COOKIES AND SIMILAR TECHNOLOGIES

When you use our Services, we and our third-party advertising partners (including advertising networks and exchanges, Internet service providers, data analytics providers, operating systems and platforms, social networks, and entities that sell data) use cookies, pixel tags, local storage, and other similar technologies (collectively, “cookies”) to collect information from your browser or device. By using the Services, you consent to our use of cookies and similar technologies.

The following types of cookies are used on our Services:

- Essential cookies – These cookies enable you to use our Services. These cookies are essential to enable you to browse our Services and use certain features. Disabling them may prevent you from using certain parts of the Services. These cookies also help keep our Services safe and secure.
- Preference cookies – These cookies store information such as your preferred country and language selection, login data and website preferences. Without these cookies, our Services may not be able to remember certain choices you've previously made (such as a saved country / language preference) or personalize your browsing experience by providing you with relevant information. These cookies can also be used to recognize your device so that you do not have to provide the same information more than once.
- Performance cookies – These cookies collect information about how you use our Services such as which pages you visit regularly. These cookies are used to provide you with a high-

quality experience by doing things such as tracking page load, site response times, and error messages.

- Content / advertising cookies– These cookies gather information about your use of our Services so we may improve your experience and provide you with more relevant content and advertising on our Services and elsewhere online and across your devices. They remember that you've visited our Services and help us understand usage of our Services. Some of these cookies are from third parties that collect information about your use of our Services in order to provide advertising (on our Services and elsewhere, across your different devices) based on your online activities (so-called "interest-based advertising") on our Services and elsewhere online, across your different devices. We do not control the privacy practices of these third parties, and their practices are not covered by this Privacy Policy.

Do-Not-Track Signals and Similar Mechanisms. Some mobile and web browsers transmit "do-not-track" signals. Because of differences in how web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they even are aware of them. We currently do not take action in response to these signals.

V. YOUR RIGHTS AND CHOICES

You may be entitled, in accordance with applicable law, to object to or request restriction of processing of your information, and to request access to, rectification, erasure, and portability of your information or more information about our information practices. Requests should be submitted in writing as set out [below](#). If you become aware of changes or inaccuracies in your information, you should inform us of such changes so that the information may be updated or corrected. Once we receive your request, we may verify it by requesting information sufficient to confirm your identity.

You may be entitled, in accordance with applicable law, to submit a request through an authorized agent or to appeal a refusal to take action on your request. To designate an authorized agent to exercise your rights and choices on your behalf, please e-mail us at contact@masterhalco.com. You also may be entitled, in accordance with applicable law, to appeal a refusal to take action on your request; to do so, please see the instructions in our responses to your request.

You may be able to refuse or disable cookies by adjusting your web browser settings. Some browsers have options that allow the visitor to control whether the browser will accept cookies, reject cookies, or notify the visitor each time a cookie is sent. Because each web browser is different, please consult the instructions provided by your web browser (typically in the "help" section). Please note that you may need to take additional steps to refuse or disable Local Shared Objects and similar technologies. If you choose to refuse, disable, or delete these technologies, some of the functionality of the Services may no longer be available to you and any differences in service are related to the data. Deleting cookies may in some cases cancel the opt out selection in your browser.

Some of our third-party partners are members of the Network Advertising Initiative, which offers a single location to opt out of ad targeting from member companies. To learn more, please click [here](#) or [here](#). For additional information on how Google processes your information and what choices you may have, visit their site [here](#). Due to differences between websites and mobile apps, you may need to take additional steps to opt out of interest based advertising for mobile applications. Please check your device settings and mobile app permissions for additional information on how to opt out. You also may stop further data collection from a mobile application by removing it from your mobile device.

You also may be able to control our collection and use of your location information through your mobile device or app settings.

We will not discriminate against you for exercising your rights and choices, although some of the functionality and features available on the Service may change or no longer be available to you.

We also provide you additional rights depending on where you live. In particular:

- By clicking the “Do Not Sell or Share My Personal Information” link, California residents may opt-out of the sale of their information or sharing of their personal information for purposes of cross-context behavioral advertising. You can also e-mail us at contact@masterhalco.com. You can also use the Global Privacy Control, which is operated by a third party. Please note that because the Global Privacy Control is a browser-based mechanism, your opt-out preference will apply only to the browser from which you exercised that choice.
- Virginia, Colorado, Connecticut, and Utah residents may opt out of the processing of their personal information for targeted advertising by e-mailing contact@masterhalco.com.
- California residents may limit the use or disclosure of their sensitive information by clicking the Limit the Use and Disclosure of My Sensitive Personal Information link.

You may lodge a complaint with a supervisory authority if you believe our processing of your information is unlawful.

VI. INTERNATIONAL TRANSFERS

By using the Services and providing us with information, you understand and agree that we may transfer and store your information on servers located outside your resident jurisdiction. To the extent you are a resident of (i) a country other than the United States, you consent to the transfer of such data to the United States for processing by us in accordance with this Privacy Policy and (ii) the United States, you consent to the transfer of such data to Japan for processing by us in accordance with this Privacy Policy.

VII. CHILDREN

We do not knowingly collect or sell any information from children, as defined by applicable law, without parental consent or as otherwise permitted by applicable law.

We do not knowingly sell or share for cross-context behavioral advertising the information of consumers who are less than thirteen years of age without the consent of a parent or guardian.

VIII. DATA RETENTION, SECURITY, AND INTEGRITY

Information will be retained only for so long as reasonably necessary and proportionate for the purposes set out above and consistent with our retention policies, in accordance with applicable laws.

We maintain reasonable security measures to safeguard information from loss, theft interference, misuse, unauthorized access, disclosure, alteration, or destruction. We also maintain reasonable procedures to help ensure that such data is reliable for its intended use and is accurate, complete, and current. You should understand that no data storage system or transmission of data over the Internet or any other public network can be guaranteed to be 100 percent secure, accurate, complete, or current. Please note that information collected by third parties may not have the same security protections as information you submit to us, and we are not responsible for protecting the security of such information.

IX. CHANGES TO THE PRIVACY POLICY

We may modify this Privacy Policy from time to time. When we update the Privacy Policy, we will revise the “Effective Date” date above and post the new Privacy Policy. We recommend that you review the Privacy Policy each time you visit the Services to stay informed of our privacy practices.

X. CONTACT INFORMATION

If you have any questions about this Privacy Policy or our practices or would like to exercise a right under applicable law, please contact us via e-mail at contact@masterhalco.com or via traditional mail addressed to 3010 Lyndon B Johnson Fwy., Suite 800, Dallas, TX 75234, Attention: IT – Chief Compliance Officer.