

## PRIVACY POLICY

Fellsway Group, LLC (“Fellsway”) is committed to respecting the privacy rights of website visitors. The following policy describes how we collect, protect, use, and share information we receive from you.

### WHAT INFORMATION DO WE COLLECT?

We collect information from you when you register an account, order products or services, or otherwise provide us with your information. The information we may collect from you includes your name, e-mail address, mailing and billing address, website username and password, phone number, payment information, and other information we may request from you or you may provide to us, including information used to facilitate the processing of your requests or regarding your preferences or interests.

Like many websites, we use various technologies to collect information when you access or use the website, including “cookies.” Please refer to the “Cookies” and Similar Technologies section below for information about cookies and how we use them.

### HOW DO WE USE YOUR INFORMATION?

We may use the information we collect from you to do the following:

- To fulfill orders, validate payments, and allow for repeat ordering.
- To allow us to better service you and respond to your customer service requests.
- To learn about site visitors and customers so we can tailor content, features, and functionalities to better serve your preferences.

Visitors who register on our website or participate in our marketing programs will be given a choice to opt-in to our e-mail marketing list and receive marketing e-mail communications from Fellsway or opt-out and choose not to receive email marketing communications from Fellsway. If you opt-in to receive Fellsway e-mails, we may send you periodic e-mails from Fellsway. If you opt-out, you will not receive these e-mails.

### HOW DO WE PROTECT YOUR INFORMATION?

We use a variety of technical, administrative and organizational security measures, including encryption of data, to maintain the safety of your personal information. Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems.

### “COOKIES” AND SIMILAR TECHNOLOGIES

“Cookies” are pieces of information that a site collects from your browser (like Google Chrome or Internet Explorer) while you are viewing and interacting with the site. Cookies are stored on your computer and work in combination with cookies within the site to capture and remember information about your use of the site. For instance, cookies are used to track your activity and understand your preferences based on previous or current site activity. This enables us to improve your site experience. We also use cookies to provide us with aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

Certain cookies we use last only for the duration of your web session and expire when you close your browser. Other cookies are used to remember you when you return to the site and, as such, will last longer. You may learn more about cookies by visiting <http://www.allaboutcookies.org>.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off cookies. You may do this through your browser settings. Each browser is different, so look at your browser “help” menu to learn the correct way to modify your cookie settings. If you turn off cookies, you may not have access to features that make your site experience more efficient -- like the features mentioned above -- and some of our services may not function properly.

We may contract with third-party service providers to assist us in analyzing cookies and similar technologies. For example, we use Google Analytics to understand how our website performs and how you use it. These third parties can use cookies and other technologies to collect information, such as the browsers you use to access our site, websites viewed, time spent on websites, and links clicked.

To learn more about how Google processes your data, please visit <https://www.google.com/policies/privacy/>. To opt out of Google Analytics please visit <https://tools.google.com/dlpage/gaoptout>.

#### DO WE DISCLOSE THE INFORMATION WE COLLECT TO OUTSIDE PARTIES?

Except as described in this Privacy Policy, we generally do not sell, trade, or otherwise transfer to outside parties your personal information unless we provide you with advance notice and obtain your consent. However, we may disclose your information to our website hosting partners and other parties who assist us in operating our website, fulfilling orders, conducting Fellsway’s business, or servicing you. We may also share information about you in connection with a corporate merger, consolidation, or restructuring; the sale of substantially all of our stock and/or assets; financing, acquisition, divestiture, or dissolution of all or a portion of our business; or other corporate change. In addition, we may release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property, or safety.

Non-personally identifiable visitor information in aggregate form may be provided to third-parties for marketing, advertising, or other uses.

#### INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

Please be aware that some of the third-party service providers with whom we may share your information are located outside of the United States. As a result, your information may be transferred from another country into the United States or out of the United States to another country. Some of these countries (including the United States) may not have data protection laws as comprehensive or protective as those in your country of residence. To the extent required by applicable law, we ensure that international transfers of your information are subject to appropriate protections, such as standard data protection clauses approved by the European Commission.

## LEGAL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION

We may process your information if any one of the following applies:

- You have given your consent to the processing of your information for one or more specific purposes;
- Processing is necessary for the performance of a contract with you and/or to take steps at your request prior to entering into a contract;
- Processing is necessary for the purposes of the legitimate interests pursued by Fellsway or by a third party, as described in this Privacy Policy; or
- Processing is necessary for compliance with a legal obligation to which Fellsway is subject.

We will gladly help to clarify the specific legal basis that applies to the processing of your information and, in particular, whether the processing of your information is a statutory or contractual requirement.

## YOUR RIGHTS

Fellsway strives to make sure that the information we maintain is reliable, accurate, and up to date.

Upon request, we will provide you with a copy of your information we hold about you to the extent required by law. You may also request, in accordance with applicable law, that your information be updated, corrected, transferred, deleted, or that processing be restricted or discontinued by contacting us at the e-mail address noted below. Where we have obtained your consent to process your personal information, you have the right to withdraw your consent at any time. If you contact us directly, we will take reasonable steps to confirm your identity before making any changes. Please note that some information remains in our records even after you request its deletion, to the extent permitted or required by applicable laws.

If you wish to opt-out of having your personal information used for advertising or marketing purposes, or to prevent your information from being shared with another organization consistent

with this Privacy Policy, or to withdraw consent previously given by you to our processing of your information for one or more reasons, please send a request to the e-mail listed below.

You may also unsubscribe from marketing e-mails that you receive from us at any time by clicking the “unsubscribe” link at the bottom of the e-mail. If you unsubscribe from marketing communications, however, it will not limit our ability to send transactional communications to you regarding products or services you have requested.

## CHILDREN

We do not knowingly collect information online from children under the age of 13. If you are under the age of 13 you should not provide any personal information to us and you should use this website only with the participation of a parent or guardian. Please note that if, while attempting to register on our site, a user provides us with their date of birth indicating that they are under the age of 13, the system will reject the submission.

## CHANGES TO OUR POLICY

If we decide to change our Privacy Policy, we will post those changes on this page. Policy changes will take effect when posted. This Policy was last modified in January 2020.

## TERMS AND CONDITIONS

This site is operated by Fellsway Group, LLC, with a primary office located at 200 Summit Drive Suite 210 Burlington MA 01803, and the site’s servers are housed in the United States. Please note that when you enter another website accessible through this site it may be operated by a different entity with its own privacy policy specific to that site. We encourage you to read the privacy policies of each site.

## HOW TO CONTACT US

Should you have any questions or concerns about our Privacy Policy please contact us at: Data Privacy Officer, Fellsway Group, LLC, 200 Summit Drive Suite 210 Burlington MA 01803, or send us an e-mail at [info@fellswaygroup.com](mailto:info@fellswaygroup.com).