



PRIVACY POLICY

LAST UPDATE: May 2018

PLEASE READ THIS DOCUMENT CAREFULLY. IT CONTAINS IMPORTANT INFORMATION ABOUT YOUR RIGHTS AND OBLIGATIONS.

www.basicconcepts.com (the "Site") is brought to you by Basic Concepts, Inc., of 1310 Harris Bridge Road, Anderson, SC 29621-3410 ("Basic Concepts", "we", "us", or "our"). This Privacy Policy describes the types of personal and non-personal information we collect on the Site, how we use such information and to whom and under what circumstances we may disclose it. By using the Site, you agree to the terms of this Privacy Policy. If you do not agree to the policy, please do not use the Site.

SCOPE OF THIS PRIVACY POLICY

This Privacy Policy applies only to information collected on or through the websites owned and operated by us. This Privacy Policy does not apply to information collected by us offline or through any other means or by any third party, including through any link, content, or application that is accessible from or on the Site. The Site is operated from within the United States (U.S.) and is intended for a U.S. audience.

COLLECTION OF INFORMATION

PERSONAL INFORMATION

We collect personal information from you when you submit it to us, including by: (1) signing up to receive product information; (2) contacting us; or (3) participating in a Site promotion or survey. This information may include, for example, your name, email address, address, telephone number and any information you submit to us that identifies you personally. We may combine the information we collect from you with information we receive about you from other sources, such as address update services. If you do not want us to obtain any personally identifiable information about you, do not submit it.

You are not obliged to provide us with any personal information that we request from you. However, failure to provide such information may have consequences in relation to what we are able to do for you. For example:

- failure to provide an address when placing an order with us will result in us being unable to deliver that order;
- if you do not agree to provide us with your contact details (*Name, Email, Company Name, Phone, State, Zip Code, and Military Unit*) when you make an inquiry with us then we shall be unable to respond to you; and,
- failure to provide the information required for setting up or validating an account with us may result in you being unable to utilize the associated benefits that come with having an account.

We will retain your personal information for as long as is needed to manage your inquiry and for a maximum of [six] years from the end of our relationship with you unless a longer period is required by law or we have a legitimate reason for doing so.

REVIEWING YOUR INFORMATION, ACCESS AND CHOICE

If the Site permits you to register or create an “account,” we will provide a button or link (“View My Account” or a similar button) on which you can review and/or update your information. Your Account page may also permit you to opt in or opt out of receiving various communications.

You have a right to request access to any personal information which we hold on you. This includes data collected through other means than submitted when you registered on the Site. In addition, you have the rights to: (1) request that any information we are holding about you is corrected where it is inaccurate; (2) request that we delete your personal information in certain circumstances (note that where we have an ongoing relationship, it may not be possible for us to delete all of the information that we hold about you); and (3) request that we move, copy, or transfer your data to another data controller.

If you would like to exercise any of these rights, or for more information please, contact us at our registered address, or via info@basicconcepts.com.

NON-PERSONAL INFORMATION

When you visit the Site, like many websites we may collect certain non-personally-identifiable information from you, including your IP address, browser type, operating system and the domain name from which you accessed the Site. In addition, we may collect information about your browsing behavior, such as the date and time you visit the Site, the areas or pages of the Site that you visit, the amount of time you spend viewing the Site, the number of times you return to the Site and other clickstream data. Because non-personally identifiable information does not identify you, we may use and share non-personal information without restriction. For example and without limitation, non-personal information is used and is shared with third parties to:

- improve our products, services, and website content; generate information about site visitors so we can make this website more useful; and
- personalize information and services when you return to our site.

Like many websites, we may use a technology called “cookies” to collect the non-personal information described above. A cookie is a small text file or piece of data that can be sent by a web server to your computer, which then may be stored on your computer when you access the Site. We may also use cookies to: (1) allow you to use the Site without having to re-enter your user name and password; (2) enhance or personalize your Site usage and experience; (3) monitor Site usage; (4) manage the Site; and (5) improve the Site and our products and services. Most web browser applications have features that can notify you when you receive a cookie or prevent cookies from being sent. If you disable cookies, however, you may not be able to use certain features on the Site.

We may also use web beacons on the Site, in our emails and in our advertisements on other websites. Web beacons are tiny graphic images that are used to collect information about your Site visit, such as the pages you view and the features you use, as well as information about whether you open and/or act upon one of our emails or advertisements. We may also collect the URL of the website you visited immediately before coming to the Site. Web beacons help us analyze our Site visitors’ behavior and measure the effectiveness of the Site and our advertising. We may work with service providers that help us track, collect and analyze this information.

We may use third-party advertising companies that use tracking technologies to serve our advertisements across the Internet. These companies may collect anonymous information about your visits to the Site

and other websites and your interaction with our advertising and other communications. Other companies may also use such companies to advertise on our Site.

We may combine the non-personal information we collect through cookies and web beacons with other information we have collected from you.

USE OF INFORMATION

We may use the information we collect from and about you for the purpose of performing our obligations under any contract, or to take steps at your request prior to entering into a contract. This would include, but is not limited to, using information collected from and about you to: (1) fulfill your requests for products; and (2) engage in correspondence for the furtherance of any contractual discussion.

We may also use the information we collect from and about you for the purpose of pursuing one of Basic Concepts' legitimate interests including, but not limited to: (1) to respond to your inquiries; (2) to contact you with Site updates, newsletters and other informational and promotional materials from us where appropriate; (3) to contact you when necessary; (4) to review Site usage and operations; (5) to address problems with the Site, our business or our services; (6) to help establish and verify the identity of users; and (7) to protect the security or integrity of the Site and our business.

Depending on the features of this Site, we may use personal information to track your activities/progress on and through this Site. We may also use your personal information for the pursuance of Basic Concepts' legitimate interests via:

- internal reports, based on personal information, relating to promotion, research, and website content;
- tracking website usage so we can improve site content and functionality;
- formulating personalized website access based on your site use and areas of interest;
- contacting you about our products or services or those of others that may be of interest to you; and
- learning about our customers and markets.

We do not provide personally identifiable information to unaffiliated third parties for their use in marketing directly to you. We will only send you promotional emails about new products and special offers where any required consent has been obtained. You may withdraw such consent and choose not to receive promotional email from us at any time by sending an email containing your request to info@basicconcepts.com. Note that this will not affect the lawfulness of any processing prior to your withdrawal.

DISCLOSURE OF INFORMATION

We may disclose information collected from and about you as follows: (1) to our related companies and service providers, to perform a business, professional or technical support function for us (including for example processing your order, receiving payment or sending you email messages on our behalf); (2) as necessary if we believe that there has been a violation of the Site Terms of Use or of our rights or the rights of any third party; (3) to respond to judicial process and provide information to law enforcement

agencies or in connection with an investigation on matters related to public safety, as permitted by law, or otherwise as required by law; and (4) in the event that our company or substantially all of its assets are acquired, your personal information may be one of the transferred assets. We may also disclose your personal information with your express consent.

We may share aggregate, non-personally-identifiable information about Site users with third parties.

Please note that any personal information that you voluntarily submit for posting to the Site becomes publicly available and can be collected and used by others.

In some circumstances it may be necessary for your personal information to be transferred to countries outside the EEA. This may be, for example, in order to store your data at an external server or back up location, or to allow one of our related companies or service providers to process the data in furtherance of a business, professional, or technical support function for us. Where we transfer your data to a third party outside the EEA, we are obliged to ensure adequate safeguards are in place to protect your personal information. We will do so by only transferring your personal information outside the EEA:

- where there has been a finding of adequacy in respect of the territory that the information is to be transferred to, including under a recognized scheme such as the EU-US Privacy Shield; or
- where the data is transferred between companies in our group, and European Commission approved model clauses have been incorporated to protect this transfer and any subsequent processing.

SECURITY

The security of your personal information and our clients' information is important to us. We will make commercially reasonable efforts to protect your personal information and ensure the security of our systems. While we have taken certain physical, electronic, and procedural steps to safeguard and secure the information we collect from Site visitors, no data transmission over the Internet can be guaranteed to be 100% secure and such transmissions are done at your own risk. We cannot guarantee that your information will not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. We cannot assume responsibility or liability for unauthorized access to our servers and systems.

NO GUARANTEES

While this privacy policy states our standards for maintenance and use of information and we will make reasonable efforts to meet them, we are not in a position to guarantee these standards. There may be factors beyond our control that may result in disclosure of information. As a consequence, we disclaim any representations or warranties relating to maintenance or nondisclosure of information.

CHILDREN

We are committed to protecting the privacy of children. We do not direct the Site to, nor do we knowingly collect any personal information from, children under the age of eighteen. **CHILDREN UNDER THIRTEEN ARE NOT PERMITTED TO USE THIS WEBSITE.** Children between the age of thirteen and eighteen must obtain the permission of their parent or guardian before viewing our Site. If you think that a child has provided us with personal information, please contact us. We will use reasonable efforts to delete this information. We are not liable for any unauthorized use of this website by minors.

PUBLIC FORUMS

This Site, now or in the future, may include public forums such as message boards, bulletin boards, chat rooms, or similar activities where users of the Site can communicate with one another. **THIS PRIVACY POLICY DOES NOT PROTECT YOU WHEN YOU USE PUBLIC FORUMS OR PROVIDE INFORMATION (INCLUDING PERSONAL INFORMATION) ABOUT YOURSELF.** You should be aware that any information shared in a public forum such as a message board, bulletin board, chat room, or other forum is public information and may be seen by third parties that do not adhere to our Privacy Policy. You should think carefully before disclosing any information in any public forum, including any forums on our Site.

SOCIAL MEDIA AND THIRD PARTY PLATFORMS

Certain situations or functionalities on this Site may permit you to choose to cross-post or share information on a third party social media site or platform such as Facebook, Instagram, LinkedIn, Twitter, Google+, or other similar sites (collectively, "Social Media Sites"). **BASIC CONCEPTS** does not own or control such Social Media Sites, and posting your information on Social Media Sites is subject to the third party's privacy policy and other legal terms, which may or may not provide privacy protections you agree with. **BASIC CONCEPTS** is not responsible for any act or omission of any Social Media Site, nor are we responsible for the consequences of choosing to share your information on Social Media Sites.

THIRD-PARTY WEBSITES

The Site may contain links to third-party websites, which may have privacy policies that differ from our own. We are not responsible for the activities and practices that take place on these sites. Additionally, the use of cookies by third parties, including our partners, affiliates, tracking utility company or service providers, is not covered by our privacy policy and we do not have control over these cookies. Accordingly, we recommend that you review the privacy policy posted on any site that you may access through the Site.

CHANGES TO THIS PRIVACY POLICY

We may change this privacy policy from time to time. When we do, we will post the change(s) on our Site. If we change the policy in a material way, we will provide appropriate online notice to you. This notice is effective from the date shown at the top.

DO NOT TRACK DISCLOSURE

This Site does not monitor for or adjust any use of information as a result of so-called Do Not Track beacons or notices.

YOUR CALIFORNIA PRIVACY RIGHTS

California law permits our customers who are California residents to request certain information about our disclosure of personal information to third parties for their direct marketing purposes during the preceding

calendar year. This request is free and may be made once a year. To make such a request, please write to us at the following address:

Justrite Manufacturing L.L.C.
2454 Dempster Street, Suite 300
Des Plaines, IL 60016

CONTACT US

If you have questions or concerns about this Privacy Policy, contact us at info@basicconcepts.com.