

# Privacy Policy

Last Updated: December 10, 2021

This Privacy Policy applies only to the websites and services controlled by PURITAN MEDICAL PRODUCTS COMPANY LLC ("PURITAN," "we," "us," or "our"), an affiliate of Hardwood Products Company, where this Privacy Policy is posted (the "Sites"). Your use of the Sites is also subject to our [Terms and Conditions](#).

**WE ENCOURAGE YOU TO READ THIS PRIVACY POLICY CAREFULLY TO UNDERSTAND OUR PRIVACY PRACTICES. BY USING THE SITES, YOU ACKNOWLEDGE YOU HAVE READ AND UNDERSTOOD THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY, PLEASE DO NOT USE THE SITES.**

For a printable version of the Privacy Policy, please [click here](#).

## Information Collected

We collect two types of information from visitors to the Sites: (1) personal information; and (2) non-personal information. "Personal information" is any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual, device, or household. "Non-personal information" includes information that does not identify an individual, device, or household. Please note that over time, non-personal information may become personal information due to regulatory developments, technological advancements, or the co-mingling of personal and non-personal information. In particular, we collect the following information from and about you:

- **Identifiers**, which may include name, address, online identifier, Internet Protocol address, or email address. These are sourced directly from you or indirectly from you (e.g., from observing your actions on the Sites). They are used to fulfil or meet the reason you provided the information, to contact you in relation to our Sites, to respond to an inquiry, for product and service improvement, to screen for potential risk or fraud, or to process an order. For example, when you contact us, you provide your first and last name, email address, and other identifying information. We disclose this information for business purposes to internet service providers, administrative service providers, and payment processors.
- **Personal information categories contained in customer records**, which may include name, address, telephone number, bank account number, credit card number, debit card number, or any other payment and financial information. We source this information directly from you. We use this information to fulfil or meet the reason you provided the information, to contact you in relation to our Sites, to respond to an inquiry, to screen for potential risk or fraud, or to process an order. For example, we need your payment information when you purchase services from us. We disclose this information for business purposes to internet service providers, administrative service providers, and payment processors.
- **Characteristics of protected classifications**, such as age or gender. We source this information directly from you. We use this information to fulfil or meet the reason you provided the information or to provide relevant services. For example, we may use this information for targeted advertising. We do not disclose this information to third parties.

- **Professional or employment-related information**, which includes information from job applications, such as current or past job history or performance evaluations. Additionally, if you contact us, subscribe to our newsletter, or comment on our blog posts, we may collect information including, but not limited to, your name, industry and job information. We use this information to fulfill or meet the reason you provided the information. We source this information directly from you. We disclose this information to administrative service providers, such as background check providers and human resources service providers.
- **Commercial information**, which may include records of services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. We source this information directly from you. We use this information to fulfill or meet the reason you provided the information, to contact you in relation to our Sites, to screen for potential risk or fraud, and to respond to an inquiry or process an order. For example, we keep track of your purchases to create a purchase history. We disclose this information for business purposes to internet service providers, administrative service providers, and payment processors.
- **Biometric information**, which may include physiological, biological, or behavioral characteristics. We source this information directly from you. We use this information to fulfill or meet the reason you provided the information. We disclose this information for business purposes to administrative service providers.
- **Internet, technical or other similar network activity**, which may include usage and browsing history; device information; search history; information on your interaction with our Sites; and error logs. We source this information directly or indirectly from you (e.g., from observing your actions on our Sites). We use this information to fulfill or meet the reason you provided the information, to screen for potential risk or fraud, or to improve our Sites. We disclose this information for business purposes to administrative service providers, data analytics providers, and internet service providers. For more information, please see our Cookie Notice, available [here](#).
- **Inferences drawn from other personal information**, which may include a profile reflecting a person's preferences, interests, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. We source this information directly or indirectly from you, (e.g., from observing your actions on our Sites). We use this information to fulfill or meet the reason you provided the information. We do not disclose this information to third parties.

## How We Respond To Do Not Track Signals

The “Do Not Track” (“DNT”) privacy preference is an option that may be made in some web browsers allowing you to opt-out of tracking by websites and online services. At this time, global standard DNT technology is not yet finalized and not all browsers support DNT. Because there currently isn't an industry or legal standard for recognizing or honoring DNT signals, we don't respond to them at this time. We await the result of work by the privacy community and industry to determine when such a response is appropriate and what form it should take.

## Children

We do not knowingly collect personal information from children under the age of majority. In the event that we learn that a person under the age of majority has provided us with personal information, we will delete such personal information.

## Use of Information Collected

We use the information that is collected about you to:

- a. Send you electronic (via email) or printed (via US mail) materials regarding our products and/or company news.
- b. Present the Sites and their content to you.
- c. Ensure the Sites are relevant to your needs.
- d. To improve our products and services.
- e. Comply with applicable laws or legal process and/or respond to requests from public and government authorities.

## Legal Bases for Processing

We process personal information in accordance with applicable law and with transparency and fairness. The legal bases for the processing activities listed in the section above are as follows:

- For letter a), with your consent;
- For letter b), in order to fulfill our contractual obligations to you;
- For letter c and d), for the legitimate purpose of operating our business, including to improve and develop our services, for fraud prevention purposes, and to improve user experience;
- For e), as otherwise in compliance with the law.

## Sharing of Information with Third Parties

We may share your personal information to the following categories of third parties and in the following instances:

- Third party service providers, who help us maintain our Sites and provide other administrative services to us, including but not limited to human resources service providers, internet service providers, analytics service providers, and payment processors;
- Third party companies, including companies resulting from possible mergers, acquisitions or other transformations; and
- Competent authorities, in order to comply with applicable laws.

We do not share or sell aggregate information related to cookies used on our website.

We will divulge personal information as required by governing law or in instances where criminal action has occurred to the extent as required by law enforcement. We may also divulge personal

information if we believe it necessary or appropriate to protect the rights, property, or safety of us, our customers, or others.

## International Transfers

If you choose to provide us with personal information, we may transfer that information to our affiliates and subsidiaries, or to other third parties, across border, and from your country or jurisdiction to other countries or jurisdictions around the world, in accordance with applicable law. If you are visiting from the EU or other regions with laws governing data collection and use that may differ from United States (US) law, your connection may be through and to servers located in the US, which may not have the same data protection laws as your local jurisdiction and may provide more limited recourse mechanisms, including dissimilar or, at times, weaker data protection rights. With knowledge of these risks, by providing your personal information you acknowledge that you understand:

- Your personal information will be used for the uses identified above in accordance with this Privacy Policy; and
- Your personal information may be transferred to the US as indicated above in accordance with applicable law. For example, where personal information is transferred from the EU to areas which have not been determined to have an adequate level of protection, we take measures designed to transfer the information in accordance with lawful requirements, such as standard contractual clauses.

## Your Rights and Choices

Email customers can opt out of commercial emails by unsubscribing on the link that appears on the bottom of every email, or by contacting Customer Service **1-888-289-3340** (U.S) or **207-876-3311**.

Additionally, depending on residence, you may have additional rights, including the rights listed below. We will respond to any rights requests in accordance with local legal regulations:

- Obtain confirmation as to whether or not your personal information exists and to be informed of its content and source, verify its accuracy and request its completion, update, amendment, or processing, such as the recipients (or categories of recipients) to whom the personal information have been or will be disclosed – our list of service providers who may receive your personal information can be found [here](#);
- Request the deletion, anonymization or restriction of the processing of your personal information processed in breach of the applicable law;
- **Object to the processing**, in all cases, of your personal information for legitimate reasons;
- Withdraw consent to processing;
- Not be subject to a decision based solely on automated decision-making (we do not use automated decision-making to produce legal or similarly significant effects on our users);

- Receive an electronic copy of your personal information, if you would like such a copy for yourself or in order to port your personal information to a different provider;
- Lodge a complaint with the relevant data protection supervisory authority.

California residents may be entitled to the below rights:

- **the right to know.** You may request information about the categories and specific pieces of personal information we have collected about you, as well as the categories of sources from which such information is collected, the purpose for collecting such information, and the sale or disclosure for business purposes of your personal information to third parties, and the categories of third parties with whom this information was shared. You may also request a copy of the personal information we have collected, and upon request, we will provide this information to you in electronic form;
- **the right to opt out** of the sale of your personal information to third parties. We do not sell your personal information at this time, we do not share your personal information with third parties for their direct marketing purposes, and we do not sell the personal information of children under 16 years old;
- **the right to request deletion** of your personal information, subject to certain legal exceptions; and
- **the right to not be discriminated against** for exercising any of the rights mentioned above. This includes the right not to be discriminated against in connection with financial incentives . We may offer various financial incentives from time to time. The terms of the financial incentive will be provided at the time you sign up for the financial incentive. You may withdraw from any of the financial incentives. We have calculated the value of the financial incentive by using the expense related to the offer, and the value of your data is the value of the offer presented to you.

You can exercise your rights by contacting us using the details set out in the “Contacting Us” section below. Whenever feasible for verification, we will match the identifying information provided by you to the personal information already maintained by us. If, however, we cannot verify your identity from the information already maintained by us, we may request additional information. You may designate an authorized agent to make a request on your behalf. Such authorized agent must have permission to submit requests on your behalf. We may deny a request from an agent that does not submit proof that they have been authorized by you to act on your behalf.

## Public Posting Areas

Please note that any information you include in a message you post to any public posting area, such as the comment section of our blog, is available to anyone with Internet access. If you don't want people to know your email address, for example, don't include it in any message you post publicly. PLEASE BE EXTREMELY CAREFUL WHEN DISCLOSING ANY INFORMATION IN PUBLIC POSTING AREAS. WE ARE NOT RESPONSIBLE FOR THE USE BY OTHERS OF THE INFORMATION THAT YOU DISCLOSE IN PUBLIC POSTING AREAS.

## Data Security and Retention

We take reasonable physical, electronic and managerial measures to safeguard and secure any personal information you provide to us. Please understand, however, that no data transmissions over the Internet can be guaranteed to be 100% secure. Consequently, we cannot ensure or warrant the security of any information you transmit to us and you understand that any information that you

transfer to us is done at your own risk. We use a secure server software, which is licensed and encrypts all information you input before it is sent to us. It's scrambled en route and decoded once it reaches our website.

Email that you send to us may not be secure unless we advise you that security measures will be in place prior to your transmitting the information; therefore, please do not send confidential information to us through unsecured email.

If we learn of a security systems breach we may attempt to notify you electronically so that you can take appropriate protective steps. By using these Sites or providing personal information to us you agree that we can communicate with you electronically regarding security, privacy and administrative issues relating to your use of these Sites. We may post a notice on our Sites if a security breach occurs. We may also send an email to you at the email address you have provided to us in these circumstances. Depending on where you live, you may have a legal right to receive notice of a security breach in writing.

We will retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

## Other Sites Linked To/From Our Website

We are not responsible for the practices employed by websites linked to/from our site nor the information contained therein. Often links to other websites are provided solely as a way for the user to obtain information that may be useful to them. To better protect your privacy, we recommend that you review the privacy policy of any third party website you visit.

## Assignment

We may share or transfer your information in the course of any direct or indirect reorganization process including, but not limited to, mergers, acquisitions, divestitures, bankruptcies, and sales of all or a part of our assets. Your information may be shared following completion of such transaction and/or during the assessment process pending transfer. If transferred in such a case, your information would remain subject to this Privacy Policy or a privacy policy that, at a minimum, protects your privacy to an equal degree as this Privacy Policy.

## Changes to this Privacy Policy

We reserve the right to change this Privacy Policy from time to time. When we do, we will also revise the "Last Updated" date at the top of this Privacy Policy. For material changes to this Privacy Policy, we will notify you either by email or by placing a prominent notice on the Sites. By continuing to use our Sites you are agreeing to be bound by any changes or revisions made to this Privacy Policy.

## Contacting Us

If you have any questions about our privacy practices or this Privacy Policy, please contact us at the following addresses:

Puritan Medical Products, LLC  
Attn: Privacy Office  
31 School St.  
P.O. Box 149  
Guilford, ME 04443-0149

[privacy@puritanmedproducts.com](mailto:privacy@puritanmedproducts.com)

800.321.2313 (US + CANADA)

207.876.3311