

## **PRIVACY POLICY**

Last Modified: December 12, 2019

### **Introduction**

Roysons Corporation (“Roysons,” “we,” or “us”) respects your privacy. This is the Privacy Policy for all digital properties owned and operated by Roysons and all corresponding domains, subdomains, applications, web pages and websites associated therewith including but not limited to [www.roysons.com](http://www.roysons.com) (collectively, the “Site”), and any other content, applications, features, functionality, information and services offered by us through the Site (collectively, and along with the Site, the “Services”). This Privacy Policy applies to all users of the Services, whether you are accessing and/or using the Services as a registered user, subscriber to our newsletters, or otherwise. Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, you may choose not to use our Site. By accessing or using this Site, you agree to this Privacy Policy.

This policy applies to information we collect:

- on or through the Site including, as applicable, your portal or account information areas;
- from online forms and comments you post or submit on or through the Site;
- through chat or other electronic messages between you and the Site;
- through your purchase of products via the Site; and
- through mobile and/or desktop applications you may download from the Site.

This policy does not apply to information collected by:

- us offline or through any other means; or
- any third party, including through any application or content that may link to or be accessible from the Site.

### **Children**

Our Site and Services are not intended for or directed to children and persons under 18 years of age. If you are under 18 years of age, please do not register with the Site, subscribe to our newsletters, use any of the interactive features of the Site, or provide any information about yourself. If we learn we have collected or received personal information from a person under 18 years of age, we will delete that information.

## **Information We Collect**

Roysons may collect the following information from or about you:

### **Information You Provide To Us**

We collect information you provide to us. For example, when you register to use our Site, we may collect your name, email address, telephone number, and/or other details to help you with your experience. When you subscribe to a newsletter, we will collect your email address. When you purchase products through our Site, we collect your name, company name, street address, billing address, credit card information, and other information necessary to process the transaction. We may also collect information entered when you fill out a form or enter other information on our site.

You may have the opportunity to sign up to receive newsletters, email correspondence and/or other communications from us to provide up-to-date information about the Services, and to publicize and promote certain content, products and services offered by us, our business partners, and/or other third parties. When there is a separate sign-up for communications, we may ask for your contact information such as name, email address, employer or organization information, business type, and, sometimes, project information. We may ask you to confirm your consent to any such uses at the time you sign up for these services or communications.

When you connect through or enable access to a third party service like LinkedIn, Instagram, Twitter, YouTube, etc. (each, a “Third Party Service”) to the Services or enable functionality from Third Party Services as part of your use of the Services, we may receive information from the applicable provider of the Third Party Service that you have consented to be shared pursuant to its terms and conditions, whether made available via an application programming interface or otherwise, as well as other information about you within that Third Party Service. Such functionality may also perform actions on your behalf on the Third Party Service that are known to the Third Party Service or others. Even if you delete your account on a Third Party Service, we may retain any information provided by that Third Party Service. Similarly, if you delete or deactivate your account on the Services, any information that we have shared with Third Party Services (in accordance with this Privacy Policy) may be retained by those Third Party Services.

### **Information We Collect Through Automatic Data Collection Technologies**

We may automatically collect certain information about your equipment, browsing actions and other patterns by using certain automatic data collection technologies when you visit, access and/or interact with the Site, including:

- ***Log Files*** – When you use the Site, our servers automatically collect certain information including information that your browser and/or device sends whenever you visit a

website and/or use the applicable device. Such information may include your IP address, browser type and settings, and other usage data.

- ***Information About Your Device*** – We may also collect information about the device on which you access the Site, including what type of device it is, unique device identifiers, and other data provided by your applicable third-party service provider and/or device manufacturer. You should read the policies of such third parties in order to learn more about what information your device makes available.
- ***Other Non-Personal Information*** – Other non-personal information related to your use of the Site, including usage, traffic data and other communication data and resources that you access when you interact with the Site.

We may supplement the information we collect with information from other sources, such as publicly available information from commercially available sources and information from our affiliates or business partners.

### **Data Collected Through Cookies and Similar Technologies**

Like many online services, we use various technologies to collect usage data and store preferences. These technologies are discussed below.

*Cookies and Local Storage.* One technology we use is called a cookie. A cookie is a small data file that is transferred to your computer’s hard disk. We may use both session cookies and persistent cookies to remember and process the items in your shopping cart, to better understand how you interact with the Services, to monitor aggregate usage by our users and web traffic routing on the Services, and to customize content and advertising. These uses allow us to improve the Services. We may create a unique device or user ID for you and store it in a cookie so we can customize your experience based on your preferences.

We may collect information through other kinds of local storage (also referred to as “Flash cookies”) and HTML5 local storage, including in connection with features such as volume/mute settings for the Video Player. Because these technologies are similar to browser cookies, they are sometimes called “browser cookies,” even though they may be stored in different parts of your computer.

Most Internet browsers automatically accept cookies. You can instruct your browser, by changing its settings, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. For information about disabling cookies or deleting information contained in Flash cookies, please [click here](#). Please note that disabling cookies or deleting information contained in cookies or Flash cookies may interfere with the performance and features of the Services.

*Web Beacons or Pixels.* In addition to cookies, we may use other technologies such as web beacons or pixel tags, which can be embedded in web pages, videos, or emails, to collect certain

types of information from your browser or device, check whether you have viewed a particular web page, ad, or email message, and determine, among other things, the time and date on which you viewed the content, the IP address of your computer, and the URL of the web page from which the content was viewed.

### **Account and Profile Data from Third-Party Services**

If you choose to log-in, access or otherwise connect to the Services, or contact Roysons through a third-party service (such as LinkedIn), we may, for example, collect your user ID and user name associated with that service, as well as any information you make public using that service. We may also collect information you have authorized the service to share with us (such as your user ID, billing information, public profile information, email address, pages you have “liked” and other account and profile data).

### **Third-Party Data.**

We may collect information about you from other sources, such as data aggregators, public databases, and our business partners. Examples of this may include information (whether identified, de-identified or anonymous, and whether collected online or offline) about your interests, demographic data, purchasing behavior, and your activities online (such as websites visited and advertisements viewed).

We may combine the information we collect from or about you and use it in the manner described in this Privacy Policy or as otherwise permitted by law.

### **How We Use Your Information**

We use information that we collect about you and/or your employer or organization, including any personal information:

- to present our Site and its contents to you;
- to allow you to participate in interactive features on our Site;
- to respond to your inquiries and provide you with information that you request from us;
- to provide any Services for which you register or subscribe;
- to provide you with products that you purchase or order from us and process any associated payment transactions;
- to provide you with notices about your account and/or newsletter subscription(s);
- to ask for ratings and reviews of services or products;

- to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection;
- to notify you about changes to our Services or our Site or any products or services we offer or provide through it;
- for any other purpose with your consent.

### **Sharing Information with Third Parties**

We may share information collected from or about you with third parties as explained further below, including business partners, social networking services, service providers, advertisers, and other companies that are not affiliated with Roysons.

**Business Partners and Affiliates.** We work with a number of business partners and affiliates who help us offer the Services, including, for example, our print providers, distributors, and payment processors. We may share information collected from or about you with such business partners or affiliates.

**Social Networking Platforms.** When you choose to share information with social networking platforms about your activities on the Services, information about you and your activities will be shared with that social network.

**Service Providers.** We may share the information collected from or about you with companies that provide services to us and our business partners, including companies that assist with payment processing, analytics, data processing and management (e.g., to facilitate search engine optimization and targeted advertising and marketing efforts), account management, hosting, customer and technical support, marketing (e.g., email, online or direct mail communications) and other services.

**Your Browsers and Devices.** We may work with service providers who use information collected from or about you to help us identify the browsers and devices you use for various purposes, including for targeted advertising, analytics, attribution, and measurement purposes. For example, these service providers (along with Roysons) may use your activity on one browser or device to serve you with more tailored advertising on another browser or device. In connection with your use of browsers and devices, please note that certain opt out choices you have as described in the section titled “Opt-Out Options for Third-Party Online Behavioral or Interest-Based Advertising on Websites” apply only to the specific browser or device from which you opt out.

**Advertisers and Advertising-Related Service Providers.** We may share the information collected from or about you in encrypted, aggregated, or de-identified forms with advertisers and service providers that perform advertising-related services for us and our business partners in order to tailor advertisements, measure and improve advertising effectiveness, and enable other

enhancements. This information includes your use of the Services, websites you visited, advertisements you viewed, and your other activities online.

**Third Parties When Required By Law or When Necessary to Protect Your or Our Rights.** In some instances, we may disclose information from or about you without providing you a choice. For example, we may disclose your information in the following ways: to protect the legal rights of Roysons and our affiliates or partners, and each of our respective equity holders, directors, officers, employees, agents, and business partners; to protect the safety and security of users of the Services or third parties; to enforce our agreements; to protect against fraud; for risk management purposes; and to comply with or respond to the law or legal process or a request for cooperation by a government entity, whether or not legally required. If you notify us that you believe your legal rights have been violated by Roysons or another user of the Services, we may provide the information that you provide to us to others to the extent that we believe it is necessary to evaluate and respond to your complaint.

**Third Parties in Connection with Certain Transactions.** If we sell all or part of our business, make a transfer of assets, or otherwise might be involved in a change of control transaction, or in the event of bankruptcy, we may transfer information from or about you to one or more third parties as part of the transaction, including the due diligence process.

**Parties with Your Consent or When You Otherwise Choose to Share.** In addition to the sharing described in this Privacy Policy, we may share any information from or about you with any party when we have your consent or when you otherwise choose to share such information. Also, certain functions within the Services may give you the option to share information about your activities on the Services, for example, by email, text message, social networking, or other sharing function.

### **Advertising**

We may advertise Roysons brands both on the Site as well as on other platforms and websites. We also may display advertisements from other companies on the Services, often enabling users to interact with the advertisements or click through to websites or other properties owned or operated by other companies. This section provides additional information about the collection and use of information from or about you in connection with such advertising.

**Use of Cookies and Similar Technology in Third-Party Advertising.** Advertisers, advertising technology companies, and service providers that perform advertising-related services for Roysons and our business partners may use cookies and similar technologies (including, for example, those described in the section titled “Information We Collect” to collect information from or about you through the Services in order to tailor advertisements, measure advertising effectiveness, and enable other enhancements. This information may relate to your use of the Services, websites you visited, advertisements you viewed, and your other activities online. Advertising that is based on information collected from or about you across websites,

applications and other platforms over time is known as interest-based or online behavioral advertising.

**Viewing Ads.** When you view an advertisement, whether or not you click on it, or when you interact with an advertisement, the advertiser, advertising technology companies, and service providers that perform advertising-related services for us and our business partners may collect some information from or about you. The information practices of these third parties are governed by their own privacy policies and are not governed by this Privacy Policy. Please be aware that Roysons does not notify you when you have chosen to click through to another website or property when using the Services. We recommend that you familiarize yourself with the privacy policies of such websites or properties to determine how they use or share any information they separately collect from you.

To learn about opting out of interest-based or online behavioral advertising, please see the information we have provided in the section titled “Opt-Out Options for Third-Party Online Behavioral or Interest-Based Advertising on Websites” below.

### **Choices About How We Use and Disclose Your Information**

You have the following choices regarding how we and third parties use certain information collected from or about you.

**Opt-Out from Promotional Communications.** You may opt out of receiving promotional communications from Roysons by clicking the “unsubscribe” link in a particular promotional communication. Please note that you cannot opt out from receiving all communications from Roysons, including administrative messages, service announcements, and messages regarding the terms and conditions of your account because those may contain important information.

If available, you can choose to receive push notifications from Roysons on your device. If you do not wish to receive push notifications, you can use your device’s settings to turn them off.

**Opt-Out Options for Third-Party Online Behavioral or Interest-Based Advertising on Websites (including Mobile Websites).** Some of the third parties that collect information from or about you on the Services in order to provide more relevant advertising to you on websites participate in the Digital Advertising Alliance Self-Regulatory Program for Online Behavioral Advertising. This program offers a centralized location where users can make choices about the use of their information for online behavioral advertising. To learn more and to make choices about the use of your information for online behavioral advertising on websites, please click

[here](#). Please note that if you opt out of online behavioral advertising using this method, this opt-out will only apply to the specific browser or device from which you opt out.

In addition, some of the advertisers, advertising technology companies, and service providers that perform advertising-related services for us and our business partners may be members of the Network Advertising Initiative (“NAI”), a cooperative of online marketing companies that offers a centralized tool for opting out of interest-based advertising delivered by each of its member companies. If you would like to obtain more information about interest-based advertising and the NAI and make choices about their members’ use of information from or about you on websites, please click [here](#). Please note that if you opt out of interest-based advertising using this method, this opt-out will only apply to the specific browser or device from which you opt out.

Roysons honors “Do Not Track” signals, meaning that it does not plant tracking cookies when a Do Not Track browser mechanism is in place.

**Tracking Technologies and Advertising.** You can set your computer’s 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 the Site may then be inaccessible or not function properly.

**Opt-Out from Collection of Precise Location Data from Your Mobile Device.** You can opt out of our collection of precise location data from your mobile device in your device settings, for example, by disabling “Location Services” for the applications in your iOS device’s settings. Please note that by opting out of our collection of precise location data, your access to the Services on your mobile device may be limited.

## **Additional Information and Choices for California Residents**

If you are a California resident, California law, including the California Consumer Privacy Act (CCPA) may provide you with additional rights regarding our use of your personal information. Please note that the CCPA defines “consumer” as a “natural person” so the rights discussed in this section do not apply to business entities.

Our Site collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“Personal Information”). Personal Information does not include: (1) publicly-available information from government records; (2) de-identified or aggregated consumer information; (3) information excluded from the CCPA’s scope, like: health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; and personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

***Our Collection of Personal Information.*** Our Site has collected the following categories of Personal Information from California consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	<p>A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.</p> <p>Some personal information included in this category may overlap with other categories.</p>	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	NO
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO

J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. § 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

Roysons obtains the categories of personal information listed above from the following categories of sources:

- Directly from you – for example, from forms you complete or products and services you purchase;
- Indirectly from you – for example, from observing your actions on our Site;

#### ***Disclosures of Personal Information for a Business Purpose***

In the preceding twelve (12) months, Roysons has disclosed the following categories of personal information for a business purpose:

Category A: Identifiers.

Category B: California Customer Records personal information categories.

Category D: Commercial information.

Category F: Internet or other similar network activity.

We disclose your personal information for a business purpose to the following categories of third parties:

- Service providers including ecommerce provider, credit card processor, and email service provider

#### ***Sales of Personal Information***

In the preceding twelve (12) months, Roysons has not sold personal information.

#### ***Access to Specific Information and Data Portability Rights***

If you are a California resident, you have the right to request that Roysons disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- the categories of personal information we collected about you;
- the categories of sources for the personal information we collected about you;

- our business or commercial purpose for collecting or selling that personal information;
- the categories of third parties with whom we share that personal information;
- the specific pieces of personal information we collected about you (also called a data portability request);
- if we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - sales, identifying the personal information categories that each category of recipient purchased; and
  - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

### ***Deletion Request Rights***

If you are a California resident, you have the right to request that Roysons delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
2. detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
3. debug products to identify and repair errors that impair existing intended functionality;
4. exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
5. comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*);
6. engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent;
7. enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
8. comply with a legal obligation; or

- make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### ***Exercising Access and Deletion Rights***

If you are a California resident, you may exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by one of the following methods:

Calling us at 1-888-769-7667.

Visiting [www.roysons.com](http://www.roysons.com)

Sending a letter to the following address:

Attention: Data Privacy Manager  
Roysons Corporation  
40 Vanderhoof Avenue  
Rockaway, New Jersey 07866

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. You may only make a verifiable consumer request for access or a copy of your data twice within a 12-month period. The verifiable consumer request must:

- provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative; and
- describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

### ***Response Timing and Format***

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time, we will inform you of the reason and extension period in writing. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

### ***Personal Information Sales Opt-Out and Opt-In Rights***

Roysons does not currently sell any personal information; therefore, there is no need for you to opt-in or opt-out. If this changes at some point in the future, Roysons will update this policy to provide you with instructions about how to opt-in or opt-out.

### ***Non-Discrimination***

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that **can result** in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

### **Security and Account Access**

We have implemented measures designed to secure your information from accidental loss and from unauthorized access, use, alteration, and disclosure. Despite these efforts, please note that there is always a possibility that a breach in data transmission or storage may occur. We want you to feel confident in our security when using the Services, but, unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your information, we cannot guarantee the security of your information transmitted to or through our Site. Any transmission of information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Site.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Site, you are responsible for keeping this password confidential. We ask you not to share your password with anyone other than those individuals in your business who are actively involved in using our Services.

### **Deleting Your Account**

You may delete your account by emailing to [dataprivacymgr@roysons.com](mailto:dataprivacymgr@roysons.com). Please note that we may retain some information from or about you in accordance with applicable law, including for various legal, operational, accounting, and auditing purposes even if you request your account to be deleted.

### **Applicable Law**

Roysons is headquartered in the United States and the Services are intended for users in the United States. By viewing any content or otherwise using the Services, you consent to the transfer of information to the United States to the extent applicable, and the collection, storage, and processing of information under United States laws.

### **Changes to This Privacy Policy**

From time to time, we may revise this Privacy Policy to reflect changes in the law or the Services or for other reasons. Therefore, it is important to check the last modified date posted at the top of the Privacy Policy each time you visit the Site or use any of the Services to ensure you are familiar with our most updated policies and practices. If we make any material change to this Privacy Policy, we will notify you by posting a notice on the Site. If you are a registered user or subscriber, we may also send an email to the email address that you most recently provided to us prior to the material change taking effect. Any material change to this Privacy Policy will be effective automatically 30 days after the revised Privacy Policy is first posted or, for users who register or otherwise provide opt-in consent during this 30-day period, at the time of registration or consent, as applicable.

### **Questions/Contacting Us**

If there are any questions regarding this Privacy Policy, you may contact us using the information below:

Roysons Corporation  
40 Vanderhoof Avenue  
Rockaway, New Jersey 07866  
[dataprivacymgr@roysons.com](mailto:dataprivacymgr@roysons.com)

Thank you for taking the time to read this Privacy Policy. We hope you enjoy our Site and our products!