

**Last Updated: April, 10 2020**

## **PRIVACY POLICY**

This privacy policy (“Policy”) describes how FNA-Group and our family of brands —AAA Premium Parts, Delco Cleaning Inc., OEM Technologies, Power Washer World, Inc., and Simpson Cleaning, Inc. (collectively “FNA Group”) — collect, use, and share personal information, whether received directly from you, through our websites (fna-group.com, aaa-premiumparts.com, simpsoncleaning.com, delco-cleaning.com, and powerwasherworld.com), mobile applications, or other methods (collectively, the “Sites”). It also describes your rights and choices regarding our use and sharing of your information, including how you can access and update such information. The Policy applies to all users of the Sites, whether you are a customer, dealer, casually browsing, or have registered with the Sites or any individual brand Site.

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### **INFORMATION WE COLLECT**

FNA Group collects the information that you provide to us, information that is automatically collected while you use the Sites, and, in some cases, information from other sources, such as FNA Group service partners and third parties.

#### **Information You Provide**

FNA Group collects the information that you provide directly to us. The categories of information we collect, and have collected in the last 12 months, may include the following:

- **Contact Information.** We collect your first and last name, postal address, email address, and telephone number.
- **Account Credentials.** We collect passwords and other information for authentication and account access.
- **Payment Data.** We collect payment information necessary to process your payment if you make a purchase.
- **Purchase and Product Information.** We collect information to fulfill and related to your purchase, such as order ID, shipping information, warranty claims, repairs, and similar information.
- **Communications.** We collect the content of messages you send to us, such as feedback and product reviews, survey responses, contest entries, and questions or information you may provide to customer service.
- **Applicant Data.** We collect information necessary to consider any application for employment you may submit to us, including your employment and education history, transcript, writing samples and references.

## Information that is Automatically Collected

When you visit the Sites, we automatically collect information about your device and how your device interacts with the Sites. The categories of information we have collected about visitors to the Sites in the last 12 months include the following:

- **IP Addresses and Other Unique Identifiers; Logs.** Either directly, or through our hosting service provider, we may automatically receive and record information from your internet browser, including your IP address (the internet address of your PC), your computer's name, the type and version of your web browser,referrer addresses, where the computer is routing from and other generally-accepted log information. We may also record page views (hit counts) and other general statistical and tracking information that will be aggregated with information about other users in order to understand how our Website is being used, and for security and monitoring purposes. We may be able to collect or infer your approximate location through certain information we collect, such as your IP address.

As described further below, we use cookies and similar technologies to collect this information.

## Information from Other Sources

In some cases, we may receive information about you from third parties. For example, if you are on another website and you agree to receive information from us, that website will forward your information to us so that we may contact you. We also may supplement the information we collect with information we receive from third parties, such as our dealer, retail, and service/repair partners, advertising and marketing partners, or social media platforms when you reference FNA Group, our products or services or grant permission to FNA Group to access your data on one or more of these platforms.

## HOW WE USE INFORMATION

FNA Group collects and uses information for business and commercial purposes in accordance with the practices described in this Policy. Our purposes for collecting and using information, including during the last 12 months, include the following:

- operating and managing the Sites, including providing you with products and services, promotions, administering and servicing users' account;
- performing services requested by you, such as responding to your inquiries and requests, fulfilling transactions and sending related communications, and considering job applications;
- maintaining the security and integrity of our systems, and preventing and addressing fraud, unlawful access, and breach of our policies and terms;
- sending you technical notices, updates, security alerts, important information about FNA Group or the Sites, and administrative messages;
- analyzing trends and usage, such as the efficiency of e-commerce and retail operations;
- helping to establish and verify the identity of users;
- improving the Sites, our products, services, advertisements, promotions, and communications;
- sending you promotional newsletters, offers, advertisements and marketing communications and other information about FNA Group and its affiliates;
- sending and serving you advertising (as further described below); and
- fulfilling any other business or commercial purposes at your direction or with your consent.

Notwithstanding the above, we may use information that does not identify you (including aggregate information or information that has been de-identified) as permitted by law.

## DISCLOSURE OF INFORMATION

You information may be shared third parties for the following business purposes or under the following circumstances:

- **Vendors.** We employ other companies to perform functions both on our and your behalf, such as maintaining and securing the Sites, sales and order fulfillment, product repairs and maintenance, customer service, credit card processing, IT services, online and offline advertising, analytics, sending and responding to electronic mail, and other functions necessary to support FNA Group, the Sites, and the products and services that we offer.
- **Questions of Harm.** We may disclose personal information about you on a case-by-case basis to attorneys, private investigation organizations, or law enforcement agencies if we believe that you are: (i) in risk of harm from another; (ii) harming or interfering (or will harm or interfere) with others; or (iii) violating (either intentionally or unintentionally) our Terms of Use or other laws, regulations or legal obligations.
- **Legal.** We may reveal personal information about you to the extent we reasonably believe we are required to do so by law. In addition, we may share your personal information with third parties as otherwise permitted by law in order, for example, to protect against fraud, the confidentiality or security of our business records or to comply with applicable legal requirements.
- **Transfer of Ownership.** We may share personal information with a third party in the event of any actual or prospective reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).
- **Contest, Sweepstakes and Other Promotions.** If you choose to enter a contest, sweepstakes or other promotion sponsored by FNA Group, we may share your personal information with third parties (including, without limitation, a co-sponsor) or the public in connection with the administration of such promotion, including, without limitation, in connection with winner selection, prize fulfillment, and as required by law or permitted by the promotion's terms or official rules (such as on a winners list).

## COOKIES AND SIMILAR TECHNOLOGIES

We and our online and email advertisers or other third-party vendors we use may provide cookies, pixel tags, web beacons, clear GIFs or other similar technologies for use on our Sites or other websites to manage and improve our online and email advertising campaigns.

- **Cookies.** A cookie is a small amount of data that often includes an anonymous unique identifier that is sent to your browser from a website's computers and stored on your computer's hard drive. Cookies are used to provide a tailored user experience and to make it easier to use a website upon a future visit. We may include cookies on our Sites and use them to recognize you when you return to our Sites.
- **Tags.** We may use "pixel tags," (also known as "web beacons", "single-pixel GIFS", or "web bugs") to tell us what parts of Sites you visited, to measure the effectiveness of searches users perform on our Site and for other purposes. Pixel tags also enable us to send email messages in a format users can read, and inform us whether emails have been opened, to help ensure that our messages are of interest to recipients.
- **Click-Throughs.** We may send emails that use a "click-through URL" linked to content on our Website. When you click one of these URLs, you pass through our web server before arriving at the destination web page. We track this click-through data to help determine interest in particular topics and measure the effectiveness of our communications. If you prefer not to be tracked simply do not click text or graphic links in the email.

- **Online Advertising.** We use third party ad partners for the serving and/or targeting of ads, promotions, and other marketing messages. These third parties may place or utilize their own cookie on your browser and may use information about your visit to our Sites, such as the number of times you have viewed an ad, in order to serve you with advertising in the future.

## Your Choices Regarding Cookies

Most web browsers accept cookies by default. You can instruct your browser, by changing its settings, to decline or delete cookies. If you use multiple browsers on your device, you will need to instruct each browser separately. Your ability to limit cookies is subject to your browser settings and limitations.

You may exercise choices regarding the use of cookies for analytics services as follows:

- [Click here](#) to view the Google Analytics opt out choice.
- [Click here](#) to view the Adobe Analytics opt out choice.

You may also exercise choice regarding the receipt of interest-based advertising. Some of the advertisers and technology companies that perform advertising-related services for us and our partners may be members of the Network Advertising Initiative ("NAI"). [Click here](#) to visit the Network Advertising Initiative site. Some of these companies may also participate in the Digital Advertising Alliance ("DAA") Self-Regulatory Program for Online Behavioral Advertising. To learn more about the DAA and your opt out options for their members, please visit (i) for website opt out, <http://www.aboutads.info/choices>; and (ii) for mobile app opt out, <http://www.aboutads.info/appchoices>.

In addition, some of the advertisers that perform advertising-related services for us and our partners may offer their own opt out choice:

- [Click here](#) to view the Google Doubleclick opt out choices.
- [Click here](#) to view the Facebook opt out choices.
- [Click here](#) to view the Twitter opt out choices.

European users may learn more information about their online choices at [www.youronlinechoices.com](http://www.youronlinechoices.com) and to view their opt out choices for certain advertising.

Please note that if you opt out using any of these methods, the opt out will only apply to the specific browser or device from which you opt out. FNA Group is not responsible for effectiveness of, or compliance with, any other parties' opt out options or programs or the accuracy of their statements regarding their programs.

## THIRD PARTY LINKS

The Sites and certain communications we send to you might contain links to third-party sites. These links are provided for your convenience only, and your use of third-party sites is subject to the privacy and other policies of those sites.

## PRIVACY OF CHILDREN

FNA Group products and the Sites are intended for persons age 18 and older. We do not knowingly collect personal information from minors under 18, nor do we knowingly "sell" the personal information

of minors under 16 years of age who are California residents without their affirmative authorization. We will delete any personal information later determined to be collected from individuals under 18.

## **DATA SECURITY**

FNA Group maintains reasonable physical, electronic, and procedural safeguards to help guard your information from loss, theft, misuse and unauthorized access, disclosure, alteration, and destruction. Please be aware, however, that any email or other transmission you send through the internet cannot be completely protected, and we cannot guarantee the security of your information collected through our Sites.

## **DO NOT TRACK**

Your browser settings may allow you to automatically transmit a "Do Not Track" signal to online sites you visit. There is no industry consensus as to what site and app operators should do with regard to these signals, however, and for that reason FNA Group does not respond to "Do Not Track" signals or other mechanisms. For more information on "Do Not Track," visit <http://www.allaboutdnt.com>.

## **YOUR RIGHTS AND CHOICES**

### **Communications**

You may opt out of receiving certain promotional or marketing communications from FNA Group by clicking "unsubscribe" at the bottom of any email, or by responding "STOP" from the mobile phone on which you received any text message. We may still continue to send you important communications relating to your use of the Sites, service announcements, or similar administrative or transactional messages.

## **CALIFORNIA PRIVACY RIGHTS AND DISCLOSURES**

California residents have certain privacy rights under state law.

### **Right to Know**

If you are a California resident, you have the right to know certain information about our data practices in the preceding 12 months. In particular, you have the right to request the following from us:

- The categories of personal information we have collected about you;
- The categories of sources from which the personal information was collected;
- The categories of personal information about you that we have disclosed;
- The categories of third parties to whom the personal information was disclosed;
- The business or commercial purpose for collecting or selling the personal information; and
- The specific pieces of personal information we have collected about you.

### **Right to Delete**

If you are a California resident, you may request that we delete your personal information. Note that deletion requests are subject to certain limitations, for example, we may retain personal information as permitted by law, such as for tax or other record keeping purposes, to maintain an active account, and to process transactions and facilitate customer requests.

## **Right to Non-Discrimination**

You have the right not to receive discriminatory treatment by us for the exercise of any your rights.

## **Exercising Your Right to Know or Delete**

To exercise your rights, please contact us by calling our toll free number at 877-362-4271. In the request, please specify whether you are making a request to know or request to delete, and provide your name, billing or shipping address, and email address so that we can verify your identity and process your request. If we are unable to verify your identity, we may ask you for additional information or deny your request.

## **Authorized Agent**

An authorized agent may submit a request on your behalf. Together with the request, your agent must submit authorization, from you, that he or she is authorized to act on your behalf, and we will verify your identity directly with you before responding.

## **Right to Opt Out of Sale**

FNA does not sell information as the term "sell" is generally understood. However, to the extent "sale" under the CCPA is interpreted to include advertising technology activities such as those disclosed in the Cookies and Analytics and Advertising sections as a "sale," we will comply with applicable law as to such activities.

## **Shine the Light**

California Civil Code Section 1798.83 permits California residents to request information regarding the disclosure of your personal information by FNA Group to third parties for the third parties' direct marketing purposes. With respect to these entities, this privacy policy applies only to their activities within the State of California.

## **NEVADA PRIVACY RIGHTS**

Nevada law (NRS 603A.340) requires each business to establish a designated request address where Nevada consumers may submit requests directing the business not to sell certain kinds of personal information that the business has collected or will collect about the consumer.

## **EUROPEAN PRIVACY RIGHTS AND DISCLOSURES**

Data subjects in the European Economic Area and the United Kingdom have additional rights as set out below.

## **Data Controller and International Transfer**

FNA-Group, Inc., 7152 99<sup>th</sup> Street, Pleasant Prairie, Wisconsin 53158, is the data controller for the personal data collected in connection with use of the Sites in the European Economic Area and the United Kingdom. We process personal data inside and outside of the United States. The personal data of users outside the United States is transferred on the basis of mechanisms approved under applicable laws, such as the Standard Contractual Clauses.

## **Lawful Basis for Processing**

Our lawful bases include where: (a) you have given consent to the processing for one or more specific purposes, either to FNA Group or to our service providers or partners; (b) processing is necessary for the performance of a contract with you; (c) processing is necessary for compliance with a legal obligation; or (d) processing is necessary for the purposes of the legitimate interests pursued by us or a third party, and your interests and fundamental rights and freedoms do not override those interests.

## **Data Subject Requests**

If you are a data subject in the European Economic Area ("EEA") or United Kingdom, you have the right to access, rectify, or erase personal data we have collected about you through the Sites. You also have the right to data portability and the right to restrict or object to our processing of personal data we have collected about you through the Sites. In addition, you have the right to ask us not to process your personal data (or provide it to third parties to process) for marketing purposes or purposes materially different than for which it was originally collected or subsequently authorized by you. You may withdraw your consent at any time for any data we process based on consent.

To exercise any of these rights, please contact us at 877-362-4271 and specify which right you seek to exercise. We will respond to your request within the time required by applicable law. We may require additional information from you to allow us to confirm your identity. Please note that we store information as necessary to fulfil the purposes for which it was collected, and may continue to retain and use the information even after a data subject request for purposes of our legitimate interests, including as necessary to comply with our legal obligations, resolve disputes, prevent fraud, and enforce our agreements.

If you have any issues with our compliance, you have the right to lodge a complaint with an EEA supervisory authority.

## **MODIFICATIONS TO THIS POLICY**

We reserve the right to change this Policy, and changes will be effective when we post the revised Policy. Use of the Sites by individuals in countries outside the EEA and United Kingdom will be understood as consent to the updated Policy, to the extent permitted by law.