

## PHOENIX PRODUCTS COMPANY INC. WEBSITE PRIVACY POLICY

This site is operated by Phoenix Products Company Inc. (hereafter referred to as "Phoenix"). We are committed to protecting your privacy. We have adopted this Privacy Policy ("Policy") to memorialize our data collection and disclosure practices for our website (the "Site").

### Consent

By using the Site, you consent to this Policy. If you do not agree with this Policy, we ask that you refrain from use of the Site. Information gathered through the Site may be transferred, used and stored in the United States and in foreign jurisdictions in which we, our agents, customers and other users of the Site are located. If you access the Site, you consent to the transfer, use and storage of your information in those jurisdictions.

### Collection of Information

We collect personally identifiable information in connection with the Site. The types of personal information collected may include your name, user name, company name, address, email address, phone number, IP address, use and browser information as examples. We may also collect non-personal and anonymous information to be used in an aggregate fashion. For example, we may collect your system-related information to be used for system administration purposes, to help diagnose problems, to monitor traffic patterns, to determine which services are used most frequently and to assess Site usage. We may retain information we gather about you indefinitely unless otherwise required by applicable law.

The Site may contain links to third party sites. We are not responsible for the privacy policies, practices or content of sites owned by others that you may link to or that may be linked from the Site. We encourage you to review the privacy policies and terms and conditions of those sites so that you understand how those sites collect, use and share your information. This Policy applies solely to the information that we collect from our Site.

### Cookies; Beacons

From time to time, we may also use "cookies", "web beacons" or similar technology for the convenience of our users and to enhance your experience using the Site. A cookie is a small text file that is recorded either temporarily or persistently on your hard drive by a web page server and is not used to deliver viruses or other harmful programs to your computer. Rather, cookies enable us to recognize a user without requiring the user to repeatedly log in when using the Site. Web beacons are graphics designed to collect web log information such as pages viewed or messages opened. By relying on cookies, web beacons and similar technology, we may be able to deliver a more efficient service that is more personalized for each user. Additionally, these technologies may allow us to monitor traffic patterns, Site usage and session information to make the Site more useful.

### Use of Information

We use information that we collect to assist us in improving and managing our operations. Examples of such use include without limit:

- Record keeping and other business operations.
- Sending promotional messages, special offers or other information that we think you may find helpful.
- From time to time, contacting you for market research purposes. We may contact you by email, phone, fax or mail. We may use the information to customize the Site according to your interests.
- Providing services to users of the Site in accordance with the general purposes of the Site.

### Disclosure of Information

We may disclose personal information and aggregate anonymous information to companies, agents, contractors or others engaged to perform functions on our behalf in connection with the Site. We may also disclose personal information and aggregate anonymous information to those businesses, divisions and units that are affiliated with Phoenix. If one of our business lines or the entire business, or a substantial portion thereof, is acquired or transferred, whether by merger, consolidation or purchase of a substantial portion of assets, we may disclose and transfer your personally identifiable information to the acquiring third party. We may also disclose your personal information to third parties when we believe, in good faith and at our sole discretion, that such disclosure is reasonably necessary to (a) enforce or apply the terms and conditions of the Site; (b) comply with legal or regulatory requirements; (c) protect the rights, property or safety of us, our users or other third parties; or (d) prevent a crime or protect national security. We may also disclose aggregate anonymous information to our clients, business partners, merchants, advertisers, investors, potential buyers and other third parties if we deem such disclosure, at our discretion, to have sound business reasons or justification.

### Children

We do not knowingly or specifically collect personal information from users under 13 years of age. We do not authorize users under 13 years of age to use the Site.

### Policy Changes

We reserve the right to change this Policy at any time. In particular, we may modify this Policy to reflect changes in the way we collect, use or disclose information, or to reflect changes in privacy laws, regulations and/or industry standards. We encourage you to review this Policy when accessing the Site. Continued use of the Site following changes indicates your acceptance of the changes.

### Applicable Law

This Policy shall be governed by the laws of the State of Wisconsin, USA, without regard to conflicts of law principles, and exclusive jurisdiction and venue for any dispute arising out of this Policy shall be the state courts or federal courts located in Wisconsin.

### Contact Information

To access your information, ask questions about our privacy practices or to submit a complaint, please contact us at:

Phoenix Products Company Inc.  
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Effective Date: 02-17-2012

Revised: 04-15-2014