

PRIVACY POLICY

Elkay Interior Systems recognizes the importance of protecting the privacy of all information provided by our users. We created the following privacy policy guided by a fundamental respect for our users' right to privacy. This policy applies to Elkay Interior Systems and all its subsidiaries and affiliates (collectively, "EIS").

Notice at Collection—Information Collected and Processed by EIS:

EIS collects information about users through (1) their registration or submission of inquiries related to some of our products and services; (2) their participation in certain activities on our websites, including contests and polls; (3) their navigation and use of our iOS and Android mobile applications (collectively, "Mobile Applications"); (4) their purchase of some of our products and services; and/or (5) their navigation of our websites via the use of cookies.

EIS does not require users to disclose their personal information, such as name, email or physical address, telephone number or birthdate, to visit and navigate our websites or Mobile Applications, but we do collect this information if and when users are required or requested to submit it to us as described below.

Instances in which Personal Information is collected:

EIS may have collected certain personal information in the preceding 12 months through:

Visiting our websites:

When users visit our websites and click on various links (i.e., request pages from our server), our web server automatically collects some information about the users, including their IP addresses, rough geographic location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of users' service use. The collection of this information is necessary for us to help diagnose problems with our server and to administer and improve our websites to provide the best user experience for website visitors.

Setting up an Account:

When setting up an account on an EIS website users will be asked to provide personal data, such as their name and email address. This information will be stored and processed by EIS to fulfill or in furtherance of a contract or prospective contract between a user or the user's organization and EIS. Users may deactivate their customer accounts or notify us of their objection to us holding and/or processing the information they provide with respect to their account at any time by contacting EIS at <https://www.elkayinteriorsystems.com/en/contact.html>. In either case, we will delete their information and deactivate their account.

Visiting our Mobile Applications:

When users visit our Mobile Applications, the Mobile Application may automatically collect some anonymized information about the user's preferences. The collection of this information is necessary for us to provide the best user experience for visitors to our Mobile Applications.

Customer Service:

EIS may also store, and process names, addresses, emails, and phone numbers provided by our users to complete a customer service request through an online customer service request form or via telephone. This information will be stored and processed by EIS to fulfill such user's customer service request or inquiry. Users may request the deletion of their personal information upon completion and processing of the user's purchase at any time by contacting EIS at <https://www.elkayinteriorsystems.com/en/contact.html>.

Purchasing our Products and Services:

EIS may also store, and process names, addresses and encrypted credit card information provided by our users to complete a user's purchase of our products and services through our eCommerce sites. This information will be stored and processed by EIS to fulfill such user's purchase. Users may request the deletion of their personal information upon completion and processing of the user's purchase at any time by contacting EIS at <https://www.elkayinteriorsystems.com/en/contact.html>.

Signing up for Newsletters and Promotions:

EIS may also store, and process e-mail addresses provided by our users to send out e-mail newsletters and promotional e-mail to our users about services and products offered by our websites if users opt in to receive such communications. By opting in, users are consenting to EIS sending the requested newsletters, emails or other communication. If users want to

subsequently opt out of receiving these communications, they can click on the “Unsubscribe” link in any newsletter or promotional e-mail and we will delete their contact information.

Signing up for EIS-Sponsored Contests and Polls:

EIS may occasionally sponsor a contest or conduct a poll on one or more of our websites where, to participate, users must enter personal information, including name, phone number, address and/or email address. EIS will collect and process this information in furtherance of our users’ desire to participate in such contests and polls. After the completion of the contests or polls, we will keep user information only in accordance with law or our legal retention periods, unless directed otherwise by our users (for example, if a user, through the entry of a contest, also opts-in to receive EIS advertisements or newsletters). Occasionally, EIS may conduct a contest or poll through one of our third-party marketing agencies. In such cases, the collection and processing of participants’ personal information will be done by such third parties and subject to their own privacy policies. Our users will be notified if EIS uses a third-party agency to conduct any of its contests or polls.

Purposes for the Use of Information that is collected:

From information collected we compile broad demographic information about our users to aid in our legitimate business interest of improving advertising or the usefulness of our websites for our users. This demographic information does not contain anything that can identify users personally. However, we may combine demographic information supplied by a subscriber at registration with site usage data, to provide profiles, in aggregate form, about our users and their preferences in the content of the site and advertising. While we do not sell any consumer personal information to third parties, we may share this composite information with our advertisers to help them better understand our services, but we do not give advertisers or other third parties information about individual users or their usage of the websites or the Mobile Applications.

Users may object to the processing of their data for the above mentioned purposes for any reason or no reason; however, due to technical reasons, it is not possible to entirely stop processing non-personal information for users that visit our websites or Mobile Applications. Users should not visit our website or Mobile Applications if they do not wish to have any of their information processed.

Contacting EIS

Users may inquire about EIS products and services visiting our websites and entering in their name and contact information. This information is being collected and processed at our users’

request and for the purpose of addressing their questions or comments related to EIS products and services.

After EIS completes the processing of a request, the correspondence is to be kept for the period required under statute or legal retention periods and the contact information is thereafter deleted.

Third Parties:

EIS occasionally contracts with third parties to provide services to our users. In performing their duties under these contracts, these third parties may have access to personal information supplied by our users; however, they are required to maintain the confidentiality of this information and are prohibited from using the information for purposes outside the scope of the contract between EIS and such third party. Some of our third-party processors include payment processors, analytic providers, software developers and marketing agencies. EIS will not reveal any personal information that users provide to us to any third party unless necessary to fulfill a contract, a user provides his/her consent, or the disclosure is permitted under applicable law. Third parties will not contact our users using our e-mail newsletter lists except through advertisements within the newsletters themselves or unless users ask to be placed on a list to receive e-mail from our advertisers on subjects of interest.

With respect to third-party websites linked to an EIS website, once a user clicks on such third-party website, he or she will automatically be connected to that website. Such third-party websites may collect, process, or use our users' personal information. As such, we recommend reviewing the privacy policy and terms of use of such third-party websites before our users submit their personal information on non-EIS websites.

Cookies

Our websites use cookies (text files placed on your computer) to deliver content specific to users' interests and to honor their preferences. This information is used to assist us in creating websites that will serve the needs of our users. EIS now encourages users to check their current browser settings to confirm they reflect their preferences with respect to EIS using cookies on their devices. Before using EIS websites, users should review and adjust browser settings as desired. For more information, including how to reject or manage cookies, please go to www.allaboutcookies.org. Additionally, users may click on the Cookie Preferences link at the bottom of the applicable EIS website to manage their cookie preferences.

To achieve our legitimate interest of providing our users with a better customer experience, our sites also use Google Analytics, a web analytics service provided by Google, Inc. (Google).

Google Analytics uses cookies to help us analyze how users in general use our websites. The information generated by the cookie about use of an EIS website (including your IP address) will be transmitted to and stored by Google on their servers. Google will use this information for the purpose of evaluating users' use of an EIS website and compiling reports on website activity for website operators.

Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. Google is certified under the EU-US Privacy Shield, which provides a certain level of data protection with respect to the processing of data by Google. Users may withdraw their consent to the use of Google Analytics' analysis by clicking on "Cookie Preferences" at the bottom of our websites and opting out of Google's use of cookies.

Retaining and Deleting Personal Data:

In addition to the deletion policies described above, which include a user's request for deletion of their personal information by contacting EIS at <https://www.elkayinteriorsystems.com/en/contact.html>. We shall not retain personal information for any purpose or purposes longer than is necessary to fulfill such purpose or purposes or longer than permitted by applicable law; provided that you may request that your personal information be deleted by revoking your consent or objecting to its use based on a legitimate interest (without EIS providing overriding legitimate grounds). EIS will not discriminate against a user if such user chooses to exercise their rights under this policy or as provided by the California Consumer Privacy Act (the "CCPA"). However, for our users' safety, certain requests for deletion cannot be fulfilled if we cannot verify such users identify. Such denial of a request for deletion or information is not discriminatory.

Notwithstanding the other provisions of this policy, we may retain and process users' personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or to protect your vital interests or the vital interests of another natural person. A user may object to the continued storage and processing of their information, but if we are able to demonstrate legitimate grounds to override such user's interest we may still store and process such information.

Children's Online Privacy Protection:

The EIS websites comply with the Children's Online Privacy Protection Act of 1998, which protects the privacy of children using the Internet. EIS does not knowingly collect contact or personal information from children under 13. The EIS websites are not intended to solicit information of any kind from children under 13 and are designed to block our knowing

acceptance of any such information. It is possible that by fraud or deception we may receive information pertaining to children under 13. If we are notified of this, as soon as we verify the information, we will immediately obtain parental consent or otherwise delete the information from our servers.

Your Rights – For our EU Resident Users

Under EU data protection laws, EU citizens and/or residents may have the some or all of the following rights with respect to his or her personal information:

1. To obtain a copy of personal information together with information about how that personal information was processed.
2. To rectify inaccurate personal information and/or complete incomplete personal information.
3. To have erased personal information
4. To have restricted processing of your personal information where:
 - a. The accuracy of such information is contested
 - b. The processing is unlawful, but you object to such information being erased; and
 - c. EIS no longer requires the personal information but it is still required for the establishment, exercise or defense of a legal claim.
5. To challenge or object to the processing that EIS has justified based on a legitimate business interest (as opposed to consent or to perform a contract).
6. To prevent us from sending direct marketing; and
7. In addition, users have the right to lodge a complaint with your local supervisory authority for data protection.

Your Rights – For our California Resident Users

Per the CCPA, EIS may be required to provide California consumers with the following notices and disclosures in connection with EIS's collection and use of such individuals' personal information:

- Categories of personal information collected
- Business and commercial purpose for using and collecting personal information

- Categories of sources of personal information
- Categories of personal information disclosed
- Categories of third parties with whom we share personal information

Per the CCPA, “Personal Information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal Information does not include publicly available information obtained from government records; de-identified or aggregated consumer information that cannot be reconstructed to identify you; any information covered under the Gramm-Leach-Bliley Act or the California Financial Information Privacy Act, activities covered by the Fair Credit Reporting Act, or protected health information as defined under the Health Insurance Portability and Accountability Act.

Such required notices and disclosures to California residents under the CCPA are described more fully in our general privacy policy above.

General:

EIS is not responsible for the content or the privacy policies of web sites to which it may provide links or the web sites of its advertisers.

EIS uses reasonable precautions to keep the personal information disclosed to us secure and to disclose such information only to responsible third parties after permission from the user.

EIS may update this policy from time to time by publishing a new version on our website. Users should check this page occasionally to ensure you are aware of any such changes.

If you have a request for information, any questions about this privacy statement, the practices of this website or your dealings with EIS you can contact EIS at

<https://www.elkayinteriorsystems.com/en/contact.html>.