

## **Privacy Policy**

### **1. Overview**

This Privacy Policy describes how Canary LLC. collects, uses, discloses, transfers, and stores your personal information as we engage with you to provide our products, services and content. We encourage you to review this information so that you may understand and consent to how we may collect, use, and share your personal information.

The current version of our Privacy Policy can be found at: <https://www.canarymarketing.com/privacy-policy/>

Canary LLC. respects individual privacy and values the confidence of its customers, clients, and business partners. Not only do we strive to process and store personal information in a manner consistent with the laws of the countries in which we do business, but we also have a tradition of upholding the highest ethical standards in our business practices. This Privacy Policy (the "Policy") sets forth the privacy principles Canary LLC. follows with respect to transfers of personal information from the EEA to the United States.

### **2. What Information We Collect**

In order to provide products, services, and content to our customers, we must collect certain personal information from and about you. Such services may include submitting shipping orders on your behalf, as well as others. Canary LLC. does not sell personal information.

The types of personal information collected, processed, and stored by Canary LLC. will be limited to those which are required to establish and maintain these services. This information has been collected and transferred to third parties within the last 12 months. Such information may include:

Information We Collect Directly from You:

- First and Last Name
- Contact Information (phone number and e-mail address)
- Company Name
- Demographic Information (Gender, Occupation)
- Billing Address
- Occasionally we may request tax ID information when shipping internationally
- Any Personal Data you provide when you communicate with us or our customer service representatives (so please only provide what is necessary).
- Any Personal Data you provide us when purchasing products

Information We Automatically Collect when You use our Site

- IP address
- Web browser information (browser type and language)
- Pages you visit, time spent on a page, and links you click on for the services only (not for marketing purposes)
- Certain Cookies (see below for more information) (collectively, "Usage Data")

### **3. How We Use Personal Information**

Canary LLC. will use the information it collects in order to:

- Establish, maintain, and improve our merchandising, product, and customer relations and marketing related services.

- Respond to inquiries or perform other tasks that are necessary when acting as a supplier of our products or services.
- Provide you with information related to confirmations, technical notices, updates, security alerts, and support and administrative messages.
- Ensure the accuracy and correctness of existing personal information and making updates, as necessary.
- Comply with legal obligations or other legal purposes, such as audit, security, fraud prevention, or preserving and defending Canary LLC.'s legal rights

Data that has been anonymized does not personally identify you and is not covered by this Privacy Statement.

Canary LLC. will retain your personal information for only as long as is necessary to provide our products and services, except where retention of personal information is necessary for compliance with a law, regulation, or other legal authority, or is otherwise permitted to be maintained for other legal purposes, such as audit, security, fraud prevention, or preserving and defending Canary LLC.'s legal rights.

#### **4. Cookies and Other Technologies**

Canary LLC.'s websites, products, services, and content may use "cookies" and other technologies such as web beacons and pixel tags. These technologies may be used to help us deliver and improve our site and services as well as better understand user behavior so we can provide you with a more personal and interactive experience that is tailored to your interests and needs.

"Cookies" are alphanumeric identifiers in the form of data files that are inserted by a website and stored by your web browser on your computer's hard drive. We may set and access cookies, such as session, statistical or marketing cookies, on your computer to enable website functionality, monitor how you interact with the website and your usage history, store your preferences or provide you with targeted content related to our products and services that maybe of interest to you.

Most internet browsers will allow you to stop cookies from being stored on your computer and to delete cookies stored on your computer, however, if you choose to eliminate cookies, the functionality of the website may be impaired not operate properly.

We, or third-party service providers acting on our behalf, may use web beacons, or pixel tags to collect certain usage information. Web beacons are images embedded in a web page or email for the purpose of measuring and analyzing website usage and activity.

We use this information to provide, enhance and improve our products, services, and content as well as to monitor and analyze its usage. Web beacons may also be used for the technical administration of our services, to better tailor our websites to user needs, to generate and derive useful data and information concerning the interests, characteristics and usage behavior of our users, and to verify that users meet our access criteria.

Pixel tags are also used to enable us to send email messages in a format a customer can read. They also tell us whether email has been opened. We may use this information to reduce, tailor, or eliminate messages that we send to users.

In some of our email messages we may use a "click-through URL" linked to web pages on our websites. When a recipient clicks on these URLs, a separate web server records their click before arriving at the destination. We use click-through data to help us determine the interest in particular content or topics. If you prefer not to be tracked in this way you may opt to not click on links contained in our emails.

Like most websites, we gather some information automatically and store it in log files. This information includes Internet Protocol (IP) addresses, browser type and language, Internet service provider (ISP), referring and exit pages, operating system, date/time stamp, and clickstream data.

We may use this information to analyze trends, administer our website, and to learn about user behavior.

#### **5. Sharing, Disclosure and Transfer to Third-Parties**

We do not sell personal data to any third parties.

In order to manage our relationship with you as a supplier of our products and services, your information may be shared with third-party

service providers or other external entities that may be engaged to assist us in managing the processes required to meet our obligations as a supplier of products and services or when required to do so by applicable law. Any engagement of a third-party service provider will be governed by appropriate contractual requirements prohibiting the use of your information for any purposes beyond those specifically directed by Canary LLC., and requiring that they ensure sufficient administrative and technical security mechanisms are in place to prevent your information from being improperly used, disclosed, or accessed.

As a result of the operations and services we provide, the sharing of your information with other service providers, partners, and customers may result in your data being sent to countries outside of your country of residence, which may have data protection laws that differ from those in your country of residence. Regardless of the source or destination location of your information, Canary LLC. will protect your information as described in this Privacy Statement and abide by all applicable data protection laws. Canary LLC. remains responsible for information that we share with third parties for processing on our behalf.

For individuals located in the European Economic Area ("EEA"), when transfers to third parties outside of the EEA occur, Canary LLC. will put sufficient protections in place to ensure compliance with the applicable legal requirements, such as use of European Union ("EU") Model Contracts, or other such protocols as may be in place from time to time.

In addition, your personal information may be transferred to a third-party as a result of an asset sale, acquisition, merger, reorganization, or other change of control or if we sell, merge, or transfer any part of our business. Part of the sale may include your Personal Information.

We may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security, law enforcement or data privacy requirements.

## **6. Access to Personal Information**

The amount of personal information that we require you to supply in order to use our services will be limited to that which is relevant to supply such services.

You have the right to request access to, withdraw your consent to the use and processing of, and request the correction of inaccuracies or erasure of your information that we maintain about you, subject to our obligations to maintain your information under applicable laws. We may limit or deny requests that interfere with our legitimate interests, or charge reasonable fees for access, except as prohibited by applicable law.

Because such information is necessary to the performance of the services that we provide to you, any request to withdraw consent for processing, or request erasure of your information may result in Canary LLC. being unable to continue providing its services. In response to a consent withdrawal request, Canary LLC. will describe the specific consequences of processing your request, with respect to Canary LLC.'s ability to continue providing services.

Canary LLC. will only store personally identifiable data about you for as long as it is reasonably required to fulfill the purposes under which it was first provided by you unless a longer retention period is required or permitted by law.

You may make review, update access, correction, or deletion requests by contacting us at:

**Email:** [privacy@canarymarketing.com](mailto:privacy@canarymarketing.com)

**Mailing Address:**

2633 Camino Ramon #120, San Ramon, CA 94583

## **7. Protection of Personal Information**

We take precautions to safeguard your information. Canary LLC. uses commercially reasonable technical, administrative, and physical controls to protect your data. We use a combination of network perimeter protections, data encryption techniques and authentication procedures, among others, to maintain the security of your personal information and our systems from unauthorized access. We also enforce physical access controls to our buildings and files.

Your personal information is stored and located on a secured system behind network perimeter control and protection systems. We

only authorize access to personal information for those employees, contractors and agents who need to know that information in order to administer, deliver, maintain, develop, or improve our services.

## **8. Third-Party Sites and Services**

Our websites and content may contain links to other websites. As such, Canary LLC. does not endorse and is not responsible for the privacy practices or the content of these third-party websites. We exercise no control over how your information is stored, maintained, or displayed by third parties or on third-party sites.

## **9. EU-U.S. Data Privacy Framework Principles**

Canary LLC complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) as set forth by the U.S. Department of Commerce. Canary LLC has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles the Principles shall govern. To learn more about the Data Privacy Framework (DPF) Program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

In compliance with the EU-U.S. DPF, Canary LLC commits to resolve DPF Principles-related complaints about our collection and use of your personal information. EU individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-U.S. DPF should first contact Canary LLC at:

[Privacy@canarymarketing.com](mailto:Privacy@canarymarketing.com)

Attention: Privacy  
2633 Camino Ramon # 120,  
San Ramon, CA, 94583

In compliance with the EU-U.S. DPF, Canary commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) with regard to unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF.

Our commitments under the EU-U.S. DPF are subject to the investigatory and enforcement powers of the United States Federal Trade Commission.

Please note that if your complaint is not resolved through these channels, under limited circumstances, a binding arbitration option may be available before a EU-U.S. DPF Panel.

## **10. Children**

Canary LLC.'s service is not directed to children. We do not knowingly collect personally identifiable information from children. If you, as a parent or guardian, become aware that your child has provided us with Personal Information without your consent, please contact us. If we become aware that a user is under the age of 16 and has provided us with Personal Information without verifiable parental consent, we will delete such information from our files.

## **11. Consumer Rights Under the California Consumer Privacy Act**

This section applies solely to individuals who reside in the State of California ("Consumers"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 ("CCPA") and other California laws. Any terms defined in the CCPA have the same meaning when used in this notice.

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

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

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months.

### **13. Deletion**

You have the right to request that we 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 our need to retain the information meets the exception criteria described in the CCPA or EU GDPR statutes.

### **14. Exercising Access, Data Portability, and Deletion Rights**

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us using the mechanism described in the above section "Access to Personal Information"

Only you or a person registered with the California Secretary of State, if you are a California Resident, 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.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

To submit a verifiable request, please initially provide the following information using the contact information in the "Access to Personal Data" section of this policy.

- Name
- Contact Information (Email Address and Phone Number)

Once you submit your verifiable consumer request, we will attempt to verify your identity by matching the information you provided us with the information in our systems. If you submit a request to know specific pieces of personal information or a request to delete certain information, additional steps may be taken to validate your identity and the request prior to processing.

We will generally avoid requesting additional information from you to verify you. However, if we cannot verify your identity based on the information originally provided or what we currently maintain, we may request additional information from you, which will only be used to verify your identity and for security or fraud-prevention purposes. We will delete any new personal information we collect to verify your identity as soon as practical after processing your request unless otherwise required by law.

If we are unable to verify your identity, we will deny your request and inform you of our inability to verify your identity and explain why we were unable to do so.

Please note that we are only required to respond to your request for access to your personal information twice within a 12-month period.

### **15. Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA or Privacy rights.

### **16. Questions Regarding the Privacy Policy or Use of Personal Data**

We welcome your comments or questions about this Privacy Policy or our practices regarding your personal. If you wish to inquire about this Privacy Policy, our practices, or exercise your privacy rights you may also contact us as described in the "Access to Personal Data" section of this policy.

### **17. Privacy Policy Changes and Notifications**

Canary LLC. may update its Privacy Policy from time to time. Use of information we collect now is subject to the current version of our

Privacy Policy. Please check back for updates.