

# Privacy Policy

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**GENERAL**

American Bath Group and its subsidiaries (ABG Hospitality, AKER by MAAX, Aquarius, Aquatic, Bootz, Briggs Bath, Clarion, Coastal, Comfort Designs, Dreamline, Hamilton, MAAX Bath, MAAX Spas, Renovative Bath Systems, Swan and all other secondary brands) (“ABG”, “we” or “us”) respect your expectation of privacy as you visit our Websites and Applications, terms which we define below.

## **PURPOSE**

The purpose of this Privacy Policy is to inform you of the types of Personal Information (as defined below) that ABG collects, uses, and discloses. This statement explains how we collect, use, and disclose Personal Information, the choices you have regarding such use and disclosure, and how you may access, correct, or delete Personal Information.

Please read this Privacy Policy carefully to understand our policies and practices for collecting, processing, and storing your Personal Information. By engaging with our Websites or Applications, you accept and consent to the practices described in this Privacy Policy. This Privacy Policy may change from time to time (see [Changes to Our Privacy Policy](#)). Your continued engagement with our Websites or Applications after any such revisions indicates that you accept and consent to them, so please check the Policy periodically for updates.

## **APPLICABILITY**

This Privacy Policy applies to the collection, use, and disclosure of Personal Information that ABG may collect from you or that you may otherwise provide to us when you:

- Visit our U.S. websites or our other digital properties or forms that link to this notice (our “Websites”).
- Use our applications (our “Apps”) for mobile devices, tablets, and other smart devices, including ABG Connect or Steamlinx.
- Attend our events, including sales or marketing events.
- Communicate with us via phone, email, text, and other forms of electronic messages, including interactive chat functions between you and our Websites.
- Interact with media on our Websites and other third-party websites like Facebook, YouTube, Pinterest, LinkedIn, Houzz, Instagram, and Twitter.
- Use our services, offline or online, unless we provide you with another Privacy Policy that notes that it supersedes this Privacy Policy.
- Interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this Policy.
- Interact with service providers with which we work to offer, provide, and improve our Websites or Apps and services to our customers. We disclose these practices in this Privacy Policy.

This Privacy Policy applies to the Personal Information collected through our Websites or Apps, regardless of the country in which you are located. Your Personal Information may be stored and processed in any country where we have affiliates, facilities, or in which we engage service

providers. By using our Websites or Apps, you understand that your information may be transferred to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your home country. For more information, see [Consent to Personal Information Transfer](#).

Our Websites or Apps may include links to third-party websites, plug-ins, services, social networks, or applications. Clicking on those links, such as links to Facebook, Instagram, or another social media site, or enabling those connections may allow a third party to collect or share information about you. We do not control these third-party websites, and we encourage you to read the privacy policy of every website and application you visit.

## COLLECTION OF PERSONAL INFORMATION

### CATEGORIES OF PERSONAL INFORMATION WE COLLECT

We collect and use different types of information from and about you including:

- [Personal Information](#)
- [Technical Information](#)
- [Combined Information](#)

#### Personal Information

**Personal information** means data that we could reasonably use to directly or indirectly identify you, such as:

- **Contact Information**, such as your name, postal or service address, email address, telephone number, username, business facsimile, social media handles, or other similar identifier.
- **Government Verification and Customer Records**, such as Social Security, tax identification, driver's license, state or government-issued identification card, bank account, credit card, or debit card numbers. This may be considered Sensitive Personal Information under certain state laws and we collect this information when necessary to provide our products or services. Please do not provide this information in response to an email or phone call unless you have initiated the request.
- **Demographic Information, which may include protected classification characteristics under state or federal law**, such as your signatures, military or veteran status, physical disabilities, gender, age, or other background information. Unless it is necessary for us to collect this information about you to provide you with products, services, or information you requested, we only collect this information as statistics, or aggregated information, meaning non-Personal Information because it does not directly or indirectly reveal your identity or directly relate to you. For example, we may aggregate Personal Information to calculate the percentage of users accessing a specific Website or App feature.
- **Payment Information**, such as name, billing address, bank account information, and payment card details (including payment card number, expiration date and security code),

some of which is collected and stored by our third-party payment processor on our behalf. This may be considered Sensitive Personal Information under certain state laws.

- **Commercial Information**, including information related to records of products or services that you purchased, obtained, or considered, or other purchasing or consuming histories or tendencies as well as information related to your transactions with us, such as your payment history.
- **Biometric Information**, including information regarding your physiological, biological, or behavioral characteristics that is intended to be used to establish your identity. Biometric information includes, but is not limited to, fingerprint data or voice recordings, keystroke patterns or rhythms, or sleep, health, or exercise data that contain identifying information.
- **Internet or Similar Network Activity**, meaning browsing history, search history, or details about your interactions with our Websites, Apps, or advertisements, including through use of what is now commonly known as “session replay” technologies, which may include data relating to the full Uniform Resource Locators (URLs), clickstream information to, through, and from our Websites (including date and time), services viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), or methods used to browse away from the page.
- **Geolocation Data**, meaning data about your location when you are using the Websites or Apps. We will ask specifically if we may use your precise geolocation and for what specific purpose, but generally this is to help find a store location near you or for shipment or delivery. Precise geolocation may be considered Sensitive Personal Information under certain state laws.
- **Audio, Electronic, Visual, Thermal, or Olfactory Information**, such as audio or video recording when you call us or when you come to an event or join recorded conference calls, but please note we may not be able to associate such recordings with you.
- **Inferences Drawn from Other Personal Information**, meaning a profile reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitude.

## Technical Information

**Technical information**, which includes:

- **Log and Usage Data**, which is service-related, diagnostic, usage and performance information our servers automatically collect when you access or use our Websites or Apps and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, operating system, browser type and settings and information about your activity in the Websites or Apps (such as the date/time stamps associated with your usage, pages and files viewed, searches and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called “crash dumps”) and hardware settings).
- **Device Data**, such as information about your computer, phone, tablet or other device you use to access the Websites or Apps. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application

identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information. We automatically collect device information (such as your mobile device ID, model, and manufacturer), operating system, version information and system configuration information, device and application identification numbers, browser type and version, hardware model, Internet service provider and/or mobile carrier, and Internet Protocol (IP) address (or proxy server). If you are using our Apps, we may also collect information about the phone network associated with your mobile device, your mobile device's operating system or platform, the type of mobile device you use, your mobile device's unique device ID and information about the features of our App you accessed. This information is primarily needed to maintain the security and operation of our Apps, for troubleshooting and for our internal analytics and reporting purposes.

## **Combined Information**

If we combine or connect non-personal, demographic, or technical information with Personal Information so that it directly or indirectly identifies an individual, we treat the combined information as Personal Information. This may happen if you are signed into your account when using our Websites or Apps. We ask that you be cognizant of information that you are sharing and that may be connected to you as an individual once you are logged into our Websites or Apps.

## **Employees or Job Applicants**

Employees or job applicants may provide additional information listed above through job applications, benefits enrollment, and payroll or direct deposit enrollment. We maintain a separate collection notice for employees and job applicants.

## **SOURCES OF PERSONAL INFORMATION**

We use different methods to collect information from and about you including through:

- [Direct Interactions](#)
- [Automated Technologies or Interactions](#)
- [Other Sources](#)

## **DIRECT INTERACTIONS**

**Direct Interactions**, such as when you give us information about you by:

- Filling in forms.
- Corresponding with us by phone, email, text, or other forms of messaging. This includes chatting with our chatbots or other help services, messaging us on social media or other platforms, or otherwise engaging with our services.
- Creating an account.
- Registering on an App.

- Expressing an interest in obtaining information about us or our products and services when you participate in activities on an App or otherwise when you contact us.
- Completing a survey.
- Placing an order.
- Subscribing to our emails.
- Searching for a service.
- Requesting further services.
- Downloading support guides.
- Registering for a warranty, service, or product.
- Reporting a problem with our Website or products.
- Posting reviews or other user contributions. You also may provide information for us to publish or display ("post") on public Website areas or transmit to other Website users or third parties (collectively, "User Contributions"). You submit User Contributions for posting and transmission to others at your own risk. Although we limit access to certain pages and/or you may set certain privacy settings for User Contributions by logging into your account profile, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of any Website users with whom you choose to share your User Contributions. Therefore, we cannot and do not guarantee that unauthorized persons will not view your User Contributions.

## **AUTOMATED TECHNOLOGIES OR INTERACTIONS**

As you interact with our Websites or Apps, we may automatically collect technical information about you:

- Computer or mobile device.
- Browsing actions, patterns, and interactions when you visit, use, or navigate our Websites or Apps.

Most of the time, this information does not reveal your specific identity (like your name or contact information), but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Websites or Apps and other technical information. This information is primarily needed to maintain the security and operation of our Websites or Apps, and for analytics and reporting purposes. This information may reveal or be associated with your identity if you are signed into an account, and we encourage you to consider this as you navigate and use our site.

## **OTHER PERSONAL INFORMATION SOURCES**

Like many businesses, we also collect information through our service providers or other third parties or technologies, including through cookies, server logs, and similar technologies (see [Cookie Policy](#)). These include:

- **Advertising networks**

- Some of our sites use AddThis, a tool from Oracle which provides us with a platform where we can perform analytics and customize our websites to provide users with more relevant advertising. Oracle may then also receive information about you via your interactions with the publisher's AddThis Tools. More about our data disclosure practices is noted below. Oracle's Privacy Policy on <https://www.oracle.com/legal/privacy/privacy-policy.html> describes how Oracle processes Personal Information it helps us collect.
- Some of our sites use AdRoll. You can opt-out of how AdRoll uses your data by visiting <https://app.adroll.com/optout/email>.
- Some of our sites use Microsoft to collect or receive Personal Information from us to provide Microsoft Advertising. Microsoft's Privacy Statement is available here: <https://privacy.microsoft.com/en-us/privacystatement>.
- Some of our sites use Xandr. You can visit [privacycenter.xandr.com](https://privacycenter.xandr.com) to opt out of having the Platform used to select ads for your browser based on your online web browsing behavior.
- **Affiliated companies**
- **Business Partners, such as our rewards partners for programs like MaaxRewards.**
- **Chat services or technologies**, such as LivePerson which is a service provider or processor and may only use the information collected as directed by us.
- **Data analytics providers**
- **Internet service providers**
- **Operating systems and platforms**
- **Service providers**, such as technical, payment, and delivery services.
- **Social networks**

**Influencer Program Disclosure:** Members of our influencer program receive perks in exchange for including certain brands' products in their social media posts. These perks include product discounts, exclusive sneak peaks to new products, and members may be featured on our Websites or Apps and social media.

## COOKIE POLICY

Our Websites or Apps may use cookies or other tracking technologies, such as pixels or web beacons. A "cookie" is a small text file that may be placed on your computer when you visit a website or click on a URL. There are two types of cookies that may be used: a session cookie and a persistent cookie. A single-session cookie is held temporarily in your computer's memory during only a single visit to a website to personalize user experience or to determine ways to improve the site, its content, and services offered through the site. A single-session cookie disappears from your hard drive when you close your browser. A persistent cookie is entered by your web browser into the "Cookies" folder on your computer and remains in this folder after you close your browser and may be used by your browser on your next visit to a website unless or until it is deleted or set to expire. Most browsers are set up to accept cookies. You may reject or delete cookies by adjusting your browser preferences at any time; however, this may limit your ability to use all the features on the site or the appearance of certain pages.

You can also manage your cookie settings and preferences by using the link in the footer called ‘Cookie Preferences.’ The Cookie Preferences center allows you to review and update which types of cookies you want to allow. You can opt out of any cookie category except the functional, performance, or strictly necessary cookies, as they are deployed to ensure the proper functioning of our technology. Please note that opting out of cookies may be browser or device specific.

Please note that opting out of cookies may be browser or device specific.

Pages of our Websites or Apps and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). Click the Cookie Preferences link on the footer of this Website or see [Your Privacy Rights and Choices](#) below for information on how you can opt out of behavioral tracking on our Websites or Apps and how we respond to web browser signals and other mechanisms that enable consumers to exercise choice about behavioral tracking. You may also review [Your Privacy Rights and Choices](#) to review the privacy choices we offer.

## **THIRD-PARTY USE OF TRACKING TECHNOLOGIES**

Some content or applications, including advertisements, on the Websites or Apps are served by third parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Websites or Apps. They may associate the information collected with your Personal Information or they may collect information, including Personal Information, about your online activities over time and across different websites or other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

- We do not always control third parties’ collection or use of your information to serve interest-based advertising. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see [Your Privacy Rights and Choices](#).
- These third parties may provide you with ways to choose not to have your information collected or used in this way. Please also refer to [Sources of Personal Information](#) and the specifics about third party sources that we describe, including the links to the privacy policies of these third parties and the choices these third parties provide regarding opting out of information sharing. You can opt out of receiving targeted ads from members of the Network Advertising Initiative (“NAI”) on the NAI’s website or members of the Digital Advertising Alliance (“DAA”) on the DAA’s website. For information about



these opt-out programs and to opt-out of the use of website browsing data for interest-based advertising by companies that participate in these programs, click the following: [NAI Opt Out](#) or [DAA Opt Out](#). To opt out of the use of information collected from the mobile applications on your device to serve ads that are targeted to your interests, consult the settings on your device. You can also click the preference icon that may appear on some of our advertising served through use of these technologies.

## USE OF PERSONAL INFORMATION

The Personal Information that we collect depends on the context of your interactions with us, the Website, or App, the choices you make, and the products and features you use. All Personal Information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such Personal Information.

We generally use your Personal Information for the following purposes (the “Purposes”):

- To fulfill the purposes for which you provided the information or that were described when it was collected.
- To respond to your inquiries, product or service complaints, product claims or product information requests.
- To collect your Personal Information in aggregate form to develop consumer profiles, perform sales analyses and identify marketing opportunities and strategies.
- To advise you about new products and services that may be of interest to you or to notify you about changes to our Websites, Mobile Apps, products, or services.
- To collect opinions and comments regarding ABG’s operations.
- To add you to ABG’s mailing list(s).
- To manage our Websites and Apps, including to present our Website content in the most effective manner for you and for your computer;
- To investigate legal claims;
- To meet our obligations and enforce our rights arising from any contracts with you, including for billing or collections, or comply with legal requirements;
- To administer our Websites and Apps and conduct internal operations, including for troubleshooting, data analysis, testing, research, statistical, and survey purposes;
- To improve our Websites, Apps, products, or services, marketing, or customer relationships and experiences;
- To enable your participation in our Website’s or App’s interactive, social media, or other similar features;
- To protect our Websites, Apps, employees, or operations;
- To measure or understand the effectiveness of the advertising we serve to you and others, and to deliver relevant advertising to you;
- To make suggestions and recommendations to you and other users of our Websites or Apps about products or services that may interest you or them;
- For other purposes with your consent;
- For other uses as may be permitted or required by applicable law.

We may use non-Personal Information for any business purpose. We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you with notice.

## DISCLOSURE OF PERSONAL INFORMATION

We may disclose your Personal Information to:

- Any member of our corporate group, which means our subsidiaries, our ultimate holding company and its subsidiaries, and our affiliates.
- Business partners, suppliers, service providers, sub-contractors, and other third parties we use to support our business (such as analytics and search engine providers that assist us with Website improvement and optimization or payment service providers). For example, on our App, we use **Google Maps Platform APIs**. We may share your information with certain Google Maps Platform APIs (e.g., Google Maps API, Place API). To find out more about Google's Privacy Policy, please refer to this [link](#).
- Third parties to market their products or services to you if you have consented to/not opted out of these disclosures. For more information, see [Your Privacy Rights and Choices](#). Please also refer to [SOURCES OF PERSONAL INFORMATION](#) and the specifics about third party sources that we describe, including the links to the privacy policies of these third parties and the choices these third parties provide regarding opting out of information sharing.
- Advertisers and advertising networks that require the information to select and serve relevant ads to you and others. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in a specific location). We may make use of the Personal Information we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.
- Credit reference agencies when required to assess your credit score before entering into a contract with you.

We may also disclose your Personal Information:

- To fulfill the purpose for which you provide it. For example, if you opt to send your "Wishlist" to an email address through the feature on our Websites or Apps, we will transmit the contents of that Wishlist or configuration to the recipients.
- For any other purposes that we disclose when you provide the information.
- With your consent.

We may also disclose your Personal Information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your Personal Information to the prospective seller or buyer of such business or assets.

- To a buyer or other successor in the event of merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, where one of the transferred assets is the Personal Information we hold.
- To comply with any court order, law, or legal process, including responding to any government or regulatory request.
- To enforce or apply our terms of use or terms and conditions of supply and other agreements.
- To protect the rights, property, or safety of our business, our employees, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of cybersecurity, fraud protection, and credit risk reduction.

We may disclose aggregated Personal Information that does not identify any individual, without restriction. We may share non-Personal Information without restriction.

**Categories of Personal Information** disclosed that may be considered a “Sale” or “Sharing” under the CCPA or may be eligible for profiling or targeted advertising opt-outs under other State Consumer Privacy Laws are Contact Information, Technical Information, Device Information, Internet or Other Network Activity, Geolocation Data, and Commercial Data.

**Categories of third parties** to whom Personal Information was disclosed that may be considered “Sale” or “Sharing” under the CCPA include advertisers and marketing partners, data analytics providers, and social media networks.

## **CONSENT TO PERSONAL INFORMATION TRANSFER**

We are based in the United States. We may process, store, and transfer the Personal Information we collect, in and to a country outside your own, with different privacy laws that may or may not be as comprehensive as your own.

If you are located outside United States and choose to provide information to us, please note that we transfer information, including Personal Information, to the United States. By submitting your Personal Information or engaging with our Websites or Apps, you consent to this transfer, storing, or processing.

We will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Information will take place to an organization or a country unless there are adequate controls in place including the security of your Personal Information.

## **YOUR PRIVACY RIGHTS AND CHOICES**

This Privacy Policy attempts to be transparent with our information collection, handling, use, disclosure, and security practices. We strive to provide you with choices regarding certain Personal Information uses, particularly around marketing and advertising.

We may choose or be required by law to provide different or additional disclosures relating to the processing of Personal Information about residents of certain states. To exercise any of your privacy rights, please refer to [Your Privacy Choices](#).

Based on the applicable laws of your state or country, you may have the right to request access to the Personal Information we collect from you, change that information, or delete it in some circumstances. To request to access, change, or delete your Personal Information, please submit a request form by clicking [Your Privacy Choices](#).

## **COMMUNICATIONS**

### **TEXT MESSAGES**

You can stop receiving SMS messages by replying STOP to any of our messages.

### **IN-APP PUSH NOTIFICATION**

You can stop receiving in-app push notifications in our Apps by adjusting your Notification Settings through our Apps or your device settings.

### **MAILINGS**

You can stop receiving postal mail by submitting a request to [privacy@americanbathgroup.com](mailto:privacy@americanbathgroup.com).

### **PROMOTIONAL EMAILS**

If you do not want us to use your contact information to promote our own products and services, or third parties' products or services (in limited circumstances), you may also opt-out of further marketing communications by replying to any promotional email we have sent you or following the opt-out links on that message. This opt-out does not apply to information provided to us as a result of a product purchase, warranty registration, product service experience, or other transactions

## **TRACKING TECHNOLOGIES AND ADVERTISING**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this Website may become inaccessible or not function properly. For more information about tracking technologies, please see our [COOKIE POLICY](#). For detailed information on the cookies we use and the purposes for which we use them, see our Cookie Preferences link at the footer of this Website, if available. If a Cookie Preferences link is not available, this means this Website only uses strictly necessary cookies

### **DO NOT TRACK SIGNALS**

Our Websites are not designed to respond to “do not track” signals received from browsers.

## **GLOBAL PRIVACY CONTROL**

Our Websites may not be designed to respond to Global Privacy Control signals. If this is implemented, it will display for you on your browser. If this is implemented, please note that it is device-specific and browser-specific. We will not send any tracking technologies or cookies if you use Global Privacy Control. If you'd like to exercise any other data rights or would like more information about how our Websites work with Global Privacy Control, you can send us a request via email to [privacy@americanbathgroup.com](mailto:privacy@americanbathgroup.com) or via [Your Privacy Choices](#).

## **ONLINE ACCOUNT HOLDERS**

Depending on the Website or App, you may be able to review and change your Personal Information by logging into the Website or App and visiting your account profile page. You may also send us an email at [privacy@americanbathgroup.com](mailto:privacy@americanbathgroup.com) or submit a request via [Your Privacy Choices](#). We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

## **USER CONTRIBUTIONS**

If you delete your User Contributions from the Websites or Apps, copies of your User Contributions may remain viewable in cached and archived pages. Such copies may have also been copied or stored by other Website or App users.

## **DO NOT SELL OR SHARE MY PERSONAL INFORMATION**

We do not generally sell Personal Information to third parties. However, we share, disclose, or make available some Personal Information to third parties for cross-contextual behavioral or targeted advertising through the use of cookies. To opt-out of this, please customize your cookie preferences by following the link in the footer of the website or changing the settings in your browser or mobile device. Please note that this is device or browser specific. You may also use an opt-out preference signal, such as the Global Privacy Control. For more information on our use of cookies and other tracking technologies, please also see our [COOKIE POLICY](#). You may also submit a request to opt-out of sales or sharing via [Your Privacy Choices](#).

## **NOTICE OF FINANCIAL INCENTIVE**

We may offer you certain financial incentives permitted by state privacy laws that can result in different prices, rates, or quality levels, such as offering coupons, discounts, promotions, other price reductions, or promotional offers for products and services in exchange for providing your Personal Information. Any financial incentive we offer will comply with state privacy laws and 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. Do not provide your Personal Information if you do not want to opt-in to these offers. After you receive a promotional offer, you may opt-out by contacting us as specified. For more information, please see [EXERCISING YOUR PRIVACY RIGHTS](#).

# YOUR PRIVACY RIGHTS

For purposes of this section, we follow the language of the California Consumer Privacy Act (“CCPA”), as amended by the California Privacy Rights Act, to describe a consumer’s rights under the CCPA and other comprehensive privacy laws, such as state laws in Colorado, Connecticut, Utah, and Virginia, among others that are forthcoming (collectively, “State Consumer Privacy Laws”).

State Consumer Privacy Laws may provide state residents with rights to request:

- **To know or access** what Personal Information we have collected or processed about you, including:
  - the categories of Personal Information;
  - the categories of sources from which we collected it;
  - the business or commercial purpose for collecting, selling, or sharing Personal Information;
  - the categories of third parties to whom we disclose Personal Information; and
  - the specific pieces of Personal Information we have collected about you, also called the **right to data portability**, meaning you may have the right to download your Personal Information and transfer it to another business.
- **To delete** certain Personal Information that we have collected, subject to certain exceptions.
- **To correct** inaccurate Personal Information that we maintain about you, taking into account the nature of the information and the purpose for collection.
- **To opt-out of sale or sharing**, if we sell or share your Personal Information. This includes the right to opt out of Personal Information processing for targeted advertising, personal data sales, or advertising for cross-context behavioral advertising purposes. It also includes the right to opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects. We only engage in cross-context behavioral or targeted advertising through cookies. We do not otherwise sell or share Personal Information for advertising purposes. We also do not engage in profiling in furtherance of decisions that produce legal or similarly significant effects. To opt-out of sharing, we will rely on you to set your preferences regarding cookies and other tracking technology. To set your Cookie Preferences, click on the Cookie Preferences link in the footer of your browser. You may also submit a request via [Your Privacy Choices](#).
- **To limit the use or disclosure of Sensitive Personal Information** if we use or disclose Sensitive Personal Information for reasons other than those set forth under the law. We do not use or disclose Sensitive Personal Information for reasons other than the limited purposes allowed under the various comprehensive privacy laws.
- **To non-discrimination.** Unless permitted by law, we will not deny you goods or services; charge (or suggest you may receive) different prices for goods or services, including through granting discounts or other benefits, or imposing penalties; or provide (or suggest you may receive) a different level or quality of goods or services. In California, this includes the right not to receive discriminatory treatment by us for the exercise of privacy rights, including an employee’s, applicant’s, or independent contractor’s right not to be retaliated against for the exercise of their state law privacy

rights. However, we may offer you certain financial incentives permitted by consumer privacy laws that can result in different prices, rates, or quality levels. Any 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. Currently, we do not provide any financial incentives.

Some of these rights are only given to individuals when acting as "Consumers," as that term is defined under the relevant law. Some of these rights do not extend to individuals who are acting in their business capacity or as an employee.

## **EXERCISING YOUR PRIVACY RIGHTS**

To submit a request to exercise any privacy rights, please submit a request through [this form](#) or by emailing [privacy@americanbathgroup.com](mailto:privacy@americanbathgroup.com). To appeal a decision regarding a consumer rights request, please send an email to [privacy@americanbathgroup.com](mailto:privacy@americanbathgroup.com) with the subject line: CONSUMER RIGHTS APPEAL.

Upon receiving your request, we may need to verify your identity to determine you are the same person about whom we have the information in our system. These verification efforts require us to ask you to provide information so that we can match it with information you have previously provided us. For instance, depending on the type of request you submit, we may ask you to provide certain information so that we can match the information you provide with the information we already have on file, or we may contact you through a communication method (e.g., phone or email) that you have previously provided to us. We may also use other verification methods as the circumstances dictate.

We will only use Personal Information provided in your request to verify your identity or authority to make the request. To the extent possible, we will avoid requesting additional information from you for the purposes of verification. If, however, we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity, and for security or fraud-prevention purposes. We delete verification information in accordance with consumer privacy laws.

We will acknowledge your request within ten (10) days. We attempt to respond to requests no later than forty-five (45) days after receipt of such requests. We will advise you in writing if we cannot meet your requests within this time limit.

## **AUTHORIZED AGENT**

Certain privacy laws allow you to have an authorized agent submit a request on your behalf. If you are using an authorized agent to exercise your rights, we may deny a request if the authorized agent does not submit proof that they have been validly authorized to act on your behalf.



## **DATA RETENTION**

Except as otherwise permitted or required by applicable law or regulation, we will only retain your Personal Information for as long as necessary to fulfill the purposes for which we collected it, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes. To determine the appropriate retention period for Personal Information, we consider applicable legal requirements, the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorized use or disclosure of your Personal Information, the purposes for which we process your Personal Information, and whether we can achieve those purposes through other means.

## **INFORMATION SECURITY**

The security of your Personal Information is very important to us. We maintain reasonable administrative, technical, and physical information security practices to protect the confidentiality, integrity, and accessibility of Personal Information. We have implemented security measures that are proportionate to the volume and nature of the Personal Information at issue.

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 Websites or Apps, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to take care when providing information in public areas of the Websites or Apps like message boards, which any Website or App visitor can view.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to our Websites or Apps. Any transmission of Personal Information is at your own risk. We are not responsible for the circumvention of any privacy settings or security measures contained on the Websites or Apps.

## **CHILDREN**

We request that children under the age of 16 not use the Websites or Apps or submit any Personal Information to the Websites or Apps. We do not direct our Websites or Apps to children under the age of 16 and we do not knowingly collect, use, store, or disclose the Personal Information of children under the age of 16 or minors as defined by local legal requirements. If we learn we have mistakenly or unintentionally collected or received Personal Information from a child without appropriate consent, we will delete it. If you believe we mistakenly or unintentionally collected any information from or about a child, please contact us at [privacy@americanbathgroup.com](mailto:privacy@americanbathgroup.com).

## **CHANGES TO THIS PRIVACY POLICY**



We will post any changes we may make to our Privacy Policy on this page and indicate that we updated our Privacy Policy. If the changes materially alter how we use or treat your Personal Information, we will notify you by email to the primary email address specified in your account and/or through a notice on the top of this Privacy Policy. Please check back frequently to see any updates or changes to our Privacy Policy.

*[Previous version of the Privacy Policy - 12-20-2022](#)*

## COMMUNICATING WITH US ABOUT OUR PRIVACY POLICY

If you have questions, comments, concerns or complaints about this Privacy Policy or our privacy practices, you may submit a request via [Your Privacy Choices](#) or send us an email at [privacy@americanbathgroup.com](mailto:privacy@americanbathgroup.com).

Please do not hesitate to contact us at:

**Website:** <https://www.americanbathgroup.com/privacy-rights-portal>

**Address:**

American Bath Group

Attn: Compliance Department

435 Industrial Road, Savannah, TN 38372

If you need to access this Privacy Policy in an alternative format due to having a disability, please feel free to contact us at [privacy@americanbathgroup.com](mailto:privacy@americanbathgroup.com).