

## SPECTRUM PRIVACY NOTICE FOR WEBSITES AND APPS

Spectrum Safety Solutions and its subsidiaries and affiliates (collectively, **Spectrum**), are committed to protecting the privacy of visitors to our websites (**Websites**) and users of our mobile applications (**Apps**). It is important that our users understand how we collect, use and disclose Personal Information (as defined below). Spectrum has implemented technical, administrative and physical measures to safeguard any personal information that we may collect.

This Privacy Notice describes our practices related to Personal Information collected through the Websites and Apps, unless there is a separate privacy notice for a particular website or mobile application.

Spectrum has a separate [General Privacy Notice](#) that covers Personal Information that Spectrum may collect and process separate and apart from its Websites and Apps. If you apply for a job through this Website, Spectrum's use of the Personal Information you provide through the Careers section is governed by Spectrum's [Job Applicant Privacy Notice](#) found in that Careers section, and not this Privacy Notice.

### **What Personal Information does Spectrum collect through its Websites and Apps? How does Spectrum collect such Personal Information?**

**Personal Information** is information through which a natural person is identifiable or may be identified. Spectrum collects, uses and processes your Personal Information in order to provide you with services, products or information that you request via our Websites and Apps.

The collection of Personal Information will be transparent to you, and you will have the opportunity to decide whether or not to provide it. If you choose not to provide any of the Personal Information requested, Spectrum may be unable to complete your transaction, or provide the information, services or products you have requested.

Spectrum collects information, including Personal Information, from you when you submit a form or request, register a product with Spectrum, or use our applications, such as: name, physical address, the company for whom you work, phone number, email address and fax number, the industry you work in, your interests, as well as any other Personal Information you provide to Spectrum. Spectrum may also ask you to provide information about the product you are registering or want support for (e.g. a device identifier) or the person/company that installed or maintains it.

Spectrum may also collect information through your use of our Websites or Apps, such as username, device identifiers, IP address, log files, and location data. For more detail, please consult the [Spectrum Cookies Policy](#).

Your mobile or internet services providers may have a conflicting privacy position or policy that permits them to capture, use and/or retain your Personal Information when you visit the Websites or use the Apps, but Spectrum is not responsible for and does not control how other parties may collect your Personal Information when you access the Websites or Apps.

### **Why does Spectrum collect your Personal Information?**

Our purpose in collecting this information is to provide customized services and content relevant to your specific needs and interests. Your information may be used by Spectrum to carry out our contractual obligations, reply to your request, authenticate you as a user and allow you access to certain areas of our Website, Apps or social media sites or allow you to apply for a position at Spectrum.

Except where used in support of a contract with you or to fulfill a legal obligation, our use of your Personal Information will be only for legitimate business interests as set out below.

Personal Information collected on the Websites or Apps may be used to:

- Provide requested information, items, or services;
- Respond to your request or further process your submitted form;
- Advertise products, services, promotions, trainings and events relating to Spectrum;
- Conduct basic business operations, such as communicate with customers and business planning;
- Develop new offerings, improve the quality of our products, services, Websites and Apps, improve and personalize user experience, and better prepare future content based upon your interests and those of our general user population;
- Verify your identity to ensure security for one of the other purposes listed here;
- Analyze your behavior on our Website and Apps;
- Obtain your location data in order to provide requested information or services;
- Provide investor services;
- Protect against fraud or investigate suspected or actual illegal activity;
- Respond to a legitimate legal request from law enforcement authorities or other government regulators; or
- Conduct investigations to ensure compliance with, and comply with, legal obligations.

#### **Where is Personal Information stored?**

Because Spectrum is a global company with locations in many different countries, we may transfer your information from one legal entity to another or from one country to another within Spectrum in order to accomplish the purposes listed above. These countries include, at a minimum, the United States, Mexico, the member states of the European Union, the United Kingdom, Switzerland, India, China and other countries. We will transfer your Personal Information consistent with applicable legal requirements and only to the extent necessary for the purposes set out above.

Spectrum relies on available legal mechanisms to enable the legal transfer of Personal Information across borders. To the extent that Spectrum relies on the Standard Contractual Clauses (also called the Model Clauses), Spectrum will comply with those requirements, including where there may be a conflict between those requirements and this Privacy Notice.

Does Spectrum use your Personal Information to contact you?

Spectrum may use the Personal Information you provide to contact you about products, services, promotions, special offers, surveys, and other information that may be of interest to you. If you prefer not to receive such communications, please use the unsubscribe function within the communication, the Websites or Apps, or submit your request via the Spectrum webform available on the website.

Spectrum will ensure that any marketing communications sent by electronic means will provide a simple method for you to opt-out or unsubscribe. Please note that if you unsubscribe from marketing communications, you may continue to receive essential communications about your account or transactions with us.

We will also use your Personal Information to contact you in response to a direct inquiry or if you register to receive communications on any of the Websites, such as the Investors section if available.

### **Does Spectrum share the information it collects with third parties?**

Spectrum may share your Personal Information with its affiliated companies and subsidiaries, such as companies in which Spectrum has control, through either direct or indirect ownership for the purposes set out above.

In addition, Spectrum will provide access to or share Personal Information on an as-needed basis with third parties, such as trusted service providers, consultants and contractors who are granted access to Spectrum facilities and systems or which provide services to Spectrum, and with government agencies and others as required by law. In particular, Spectrum will only share your Personal Information outside Spectrum to:

- Service providers, dealers, distributors, agents or contractors that Spectrum has retained to perform services on our behalf. Spectrum will only share your Personal Information with third parties whom Spectrum has contractually restricted from using or disclosing the information except as necessary to perform services on our behalf or to comply with legal requirements;
- Comply with legal obligations, including but not limited, to complying with tax and regulatory obligations, sharing data with labor/trade unions and works councils, and responding to a court proceeding or a legitimate legal request from law enforcement authorities or other government regulators;
- Investigate suspected or actual illegal activity;

Your Personal Information will also be maintained and processed by our service providers in the United States, Mexico, the member states of the European Union, Norway, the United Kingdom, India, China and in other jurisdictions, within an appropriate legal and contractual framework.

### **How does Spectrum secure Personal Information?**

Spectrum is committed to ensuring the security and integrity of Personal Information. Spectrum has adopted reasonable physical, technical, organizational and administrative procedures to safeguard your Personal Information. However, due to the nature of Internet communications, we cannot guarantee or warrant that your transmission to us is secure.

### **How long do we keep your Personal Information?**

The Personal Information you provide to Spectrum is only kept for as long as it is reasonably necessary for the purposes for which it was collected, taking into account our need to comply with contractual obligations, resolve customer service issues, comply with legal requirements and provide new or improved products and services to users. This means that we may retain your Personal Information for a reasonable period after you stopped using the Spectrum Websites or Apps. After this period, your Personal Information will be deleted from all systems of Spectrum without notice.

### **How can you correct, change or delete your information held by Spectrum?**

You may request to access, update, correct, change, or delete your Personal Information at any time. Spectrum will use reasonable efforts to timely update and/or remove your Personal Information. To protect the user's privacy and security, Spectrum will take steps to verify the user's identity before making any requested access or change. To access, update, correct, change, or delete your Personal Information, to ask questions or to raise concerns regarding data protection and privacy, or submit your request via the Spectrum [webform](#). Some of our

Websites, Apps, and social media accounts allow you to make corrections directly at the site without need to further contact Spectrum.

Please note that while we will assist you in protecting your Personal Information, it is your responsibility to protect your passwords and other access credentials from others.

### **What should you understand about the third-party links that may appear on this Website?**

In some instances, Spectrum may provide links to non-Spectrum controlled websites, which Spectrum will make reasonable efforts to identify as such. Spectrum does not control such third-party websites, however, and cannot be responsible for the content or the privacy practices employed by other websites. Furthermore, this Privacy Notice does not govern information collected about you by third parties.

### **How may Spectrum use location data?**

Spectrum is a global provider of industrial fire safety systems and products. As such, the following are some examples of when location data may be requested to provide some of the services Spectrum offers:

- If you are a visitor to or an employee at our offices, use your location data to help you locate the nearest printer or conference room, in order to provide an enhanced experience at our offices;
- To determine which service technician is closest to a service call.

In all of these cases, Spectrum will ask permission to collect your location data and so the collection of this data will be transparent to you – you will have the opportunity to decide whether or not to provide your location data. If you choose not to provide your location data, Spectrum may be unable to provide the requested service or complete the requested transaction.

### **What additional information should specific users know?**

**Parents, Guardians, and Children:** Our Apps and Websites are intended for visitors who are at least 18 years of age, or the age of majority in their jurisdiction of residence. Spectrum does not knowingly solicit information from, or market products or services to, children. If you do not meet the age requirements set out above, please do not enter your Personal Information on this or any other Spectrum Websites or Apps.

**Users from California:** If you are a resident of California, effective January 1, 2020, you have certain rights under the California Consumer Privacy Act of 2018 (as amended by the California Consumer Privacy Rights Act) (**CCPA**), including the right to:

- Know** the categories and/or specific pieces of personal information Spectrum collects, the purposes for which Spectrum uses that information, and the categories of information Spectrum discloses to third parties.
- Access** categories of personal information about you that Spectrum collects, uses, discloses and shares.
- Delete** personal information Spectrum has collected from you and require service providers to do the same, subject to certain exceptions.
- Opt-out** of the sale or sharing of your personal information by Spectrum.
- Correct** any inaccurate information Spectrum may have collected about you.

- f. **Limit** the use or disclosure of sensitive information, such as your social security number, financial account information, geolocation.
- g. **Removal** of content if you are under the age of 18 California Business and Professions Code Section 22581 permits you to request and obtain removal of content or information you have publicly posted.
- h. **Exercise** your privacy rights without fear of discriminatory action.

Requests to exercise rights under the CCPA are subject to verification by Spectrum and are also subject to certain restrictions provided by the CCPA. We will not discriminate against California residents for exercising any of their applicable CCPA rights. While California residents have the right to opt-out of the sale of their personal information under CCPA, Spectrum **does not sell** personal information to third parties. If our practices change, we will update this Privacy Notice and take any necessary action to comply with applicable law.

California residents who wish to exercise their CCPA rights can contact Spectrum via the Spectrum webform available on the website. You can also contact us at 1-833-617-0050.

California Civil Code Section 1798.83, also known as “Shine The Light” law permits California residents to annually request and obtain information that Spectrum shared with other businesses for their own direct marketing use within the prior calendar year. If applicable, this information would include a list of the categories of Personal Information that was shared and the names and addresses of all third parties with which Spectrum shared this information in the immediately preceding calendar year. To obtain this information, please contact Spectrum via the Spectrum **webform**.

**Users from the European Union, Norway, United Kingdom and other countries with privacy laws:** You have the right to lodge a complaint with your national or state data protection authority, which may also be known as a supervisory authority. You also have the right to: (i) request access to and correction or erasure of your Personal Information; (ii) seek restrictions on; or (iii) object to the processing of certain Personal Information, and seek data portability under certain circumstances. To contact Spectrum about a request to access, correct, erase, object or seek restrictions or portability, please contact Spectrum via the Spectrum webform available on the website.

**Users from mainland China:** You have the right (1) to be informed why and how Spectrum processes your Personal Information, (2) to seek restriction or objection on process of your Personal Information, (3) to have access to or have a copy of your Personal Information, (4) to correct and update your Personal Information, (5) to seek data portability, (6) to erase your Personal Information if not against statutory requirement; (7) to withdraw consent of further processing your Personal Information, and (8) to cancel your account that you registered. Spectrum shall promptly respond to your rights in a reasonable manner. Please contact Spectrum via the Spectrum webform.

**Users from the US:** Spectrum does not collect Social Security Numbers through its Websites.

### **How might Spectrum change this Privacy Notice?**

As Spectrum expands and improves its Websites and its Apps, or as legal requirements change, we may need to update this Privacy Notice. This Privacy Notice may be modified from time to time without prior notice. We encourage you to review this Privacy Notice on a regular basis for any changes. The date of the latest version will be identified at the bottom of the policy.

### **How can you contact Spectrum?**

If you wish to access, correct, update or erase your Personal Information, or if you have questions about Spectrum's privacy practices in general or a complaint, submit your request via the Spectrum [webform](#). If you are located in a country that is governed by the General Data Protection Regulation and would like to contact the local Data Protection Officer, please indicate this in the form and your inquiry will be directed to the appropriate person.

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