1. Scope of this Policy

This privacy policy applies to:

- Pacific Market International, LLC and our affiliates and brands (“PMI,” “we,” “us,” “our”).
- PMI’s online properties, including our websites, and websites or mobile applications that link to it, and our social media pages or handles; our products, and our services (collectively “Services”).
- Information you provide or we receive when you interact with us off-line.

This Policy applies when you interact with us through our Services or off-line. It also applies anywhere it is linked. It does not apply to third-party websites, mobile applications, or services that may link to the Services or be linked to from the Services. Please review the privacy policies on those websites and applications directly to understand their privacy practices.
We may change this Policy from time to time. If we do, we will notify you by posting the updated version.

2. Information We Collect

We collect information from you directly, from the devices you use to interact with us, and from third parties. We may combine information from the Services together and with other information we obtain from our business records. We may use and share information that we aggregate (compile to create statistics that cannot identify a particular individual) or de-identify (strip information of all unique identifiers such that it cannot be linked to a particular individual) at our discretion.

2.1. Information you give us

You may provide the following information to us directly:

- Contact and professional information, including name, email address, telephone number, and job title, as well as company name and size.
- Demographic information.
- Audiovisual information, including recordings of online events or photos you include in product reviews.
- Payment information, including credit card information.
- Content you may include in survey responses.
- Information contained in your communications to us, including emails to or online chats with customer service.
- Information you make available to us via a social media platform.
- Any information or data you provide by commenting on content posted on our Services, including product reviews. Please note that these comments are also visible to other users of our Services.
- Information you submit to inquire about or apply for a job with us.
- Any other information you submit to us.

2.2. Information we collect automatically

We and partners working on our behalf may use log files, cookies, or other digital tracking technologies to collect the following information from the device you use to interact with our Services. We also create records when you make purchases or otherwise interact with the Services.

For example, PMI and third parties may collect information from your computer, tablet, phone, or other devices on which you install mobile applications. Information collected is used to assist in accessing our websites, or to determine whether you open an email or click on an advertisement or help keep track of items you put into your shopping cart, including when you have abandoned your cart. This information determines when to send cart reminder messages via SMS or email.

- Device information, including IP address, device identifiers, and details about your web browser.
Analytical information, including details about your interaction with our website, app, and electronic newsletters.

Diagnostic information, including web traffic logs.

Advertising information, including special advertising and other unique identifiers that enable us or third parties working on our behalf to target advertisements to you. Please be aware that our advertising partners may collect information about you when you visit third-party websites or use third-party apps. They may use that information to better target advertisements to you on our behalf.

Business record information, including records of your purchases of products and services.

2.3. Information We Collect From Other Sources

We may collect the following information about you from third-party sources.

- Subscription registration information.
- Contact information, demographic information, and information about your interests and purchases, from consumer data providers and data enrichment services.
- Information about your credit history from credit reporting agencies.
- Information about your interests, activities, and employment history from social networks and other places where you choose to share information publicly.
- Background check information if you apply for a job with us that requires a background check, where permitted by law and with your consent (to the extent required by law).
- Information about your interaction with advertisements on our Services, or ads that we place on third party websites, from online advertising companies.
- If you decide to invite others to the Services, we will collect your and the other person’s names, email addresses, and/or phone numbers to send an email or text message and follow up with the other person. You agree that you will obtain the other person’s consent before giving us his or her contact information. You also agree that you will not send us the contact information of a minor. We will inform any other person you invite that you gave us his or her information in the invitation email.

3. How We Use Your Information

We may use any of the information we collect for the following purposes.

- **Service functionality**: To provide you with our products and services, including to take steps to enter a contract for sale or for services, process payments, fulfill orders, send service communications (including renewal reminders), and conduct general business operations, such as accounting, recordkeeping, and audits. We use information for service functionality to perform our contract with you and/or pursuant to our legitimate interests.

- **Service improvement**: To improve and grow our Services, including to develop new products and services and understand how our Services are being used, our customer base and purchasing trends, and the
effectiveness of our marketing. We use information for service improvement pursuant to our legitimate interests.

- **Personalization**: To offer you recommendations and tailor the Services to your preferences. We use information for personalization pursuant to our legitimate interests.

- **Advertising and marketing**: To send you marketing communications, personalize the advertisements you see on our Services and third-party online properties, and measure the effectiveness of our advertising. We may share your information with business partners, online advertising partners, and social media platforms for this purpose. We use information for advertising and marketing with your consent and/or pursuant to our legitimate interests.

- **Security**: To protect and secure our Services, assets, network, and business operations, and to detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal. We use information for security purposes pursuant to our legitimate interests and/or for compliance with legal obligations.

- **Legal compliance**: To comply with legal process, such as warrants, subpoenas, court orders, and lawful regulatory or law enforcement requests and to comply with applicable legal requirements. We use information for legal compliance purposes for compliance with legal obligations.

4. **How We Share Your Information**

We may share any of the information we collect with the following recipients.

- **Affiliates**: We share information with other members of our group of companies.
  
  - Please note though that, if you opt into a Stanley mobile messaging program, your consent is specific to that program and is not shared among our affiliates. If you want to receive mobile messages from any other PMI program, you must opt into that program separately.

- **Service providers**: We engage vendors to perform specific business functions on our behalf, and they may receive information about you from us or collect it directly. These vendors are obligated by contract to use information that we share only for the purpose of providing these business functions, which include:
  
  - **Supporting Service functionality**, such as vendors that support event registration, customer service and customer relationship management, subscription fulfillment, freight services, application development, list cleansing, postal mailings, and communications (email, fax).
  
  - **Auditing and accounting firms**, such as firms that assist us in the creation of our financial records.
  
  - **Professional services consultants**, such as firms that perform analytics, assist with improving our business, provide legal services, or supply project-based resources and assistance.
  
  - **Analytics and marketing services**, including entities that analyze traffic on our online properties and assist with identifying and communicating with potential customers.
  
  - **Security vendors**, such as entities that assist with security incident verification and response, service notifications, and fraud prevention.
  
  - **Information technology vendors**, such as entities that assist with website design, hosting and maintenance, data and software storage, and network operation.
• **Marketing vendors**, such as entities that support distribution of marketing emails.

• **Business partners**: From time to time, we may share your contact information with other organizations for marketing purposes.

• **Online advertising partners**: We partner with companies that assist us in advertising our Services, including partners that use cookies and online tracking technologies to collect information to personalize, retarget, and measure the effectiveness of advertising.

• **Social media platforms**: If you interact with us on social media platforms, the platform may be able to collect information about you and your interaction with us. If you interact with social media objects on our Services (for example, by clicking on a Facebook “like” button), both the platform and your connections on the platform may be able to view that activity. To control this sharing of information, please review the privacy policy of the relevant social media platform.

• **Government entities/Law enforcement**: We may share information when we believe in good faith that we are lawfully authorized or required to do so to respond to lawful subpoenas, warrants, court orders, or other regulatory or law enforcement requests, or where necessary to protect our property or rights or the safety of our employees, our customers, or other individuals.

• **Other businesses in the context of a commercial transaction**: We may change our ownership or corporate organization while providing the Services. We may transfer to another entity or its affiliates or service providers some or all information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information as described in this policy.

5. **Security**

We use a combination of physical, technical, and administrative safeguards to protect the information we collect through the Services. While we use these precautions to safeguard your information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf.

6. **Your Options and Rights Regarding Your Information**

**Your Account**: Please visit your account page to update your account information.

**Email Unsubscribe**: If you do not wish to receive marketing information from us or wish to opt out of future email promotions from us, please contact us. Please note that all promotional email messages you receive from us will include an option to opt out of future email communications.

**Ad Choices**: You have options to limit the information that we and our partners collect for online advertising purposes.

• You may disable cookies in your browser or mobile device using their settings menus. Your mobile device may give you the option to disable advertising functionality. Because we use cookies to support Service functionality, disabling cookies may also disable some elements of our online properties.

• The following industry organizations offer opt-out choices for companies that participate in them: the [Network Advertising Initiative](https://www.networkadvertising.org/), the [Digital Advertising Alliance](https://www.digad.org/), and the [European Interactive Digital Advertising Initiative](https://edaa.tv/).
• You may use our cookie settings menu.
• You may contact us directly.

If you exercise these options, please be aware that you may still see advertising, but it will not be personalized. Nor will exercising these options prevent other companies from displaying personalized ads to you.

If you delete your cookies, you may also delete your opt-out preferences.

**Do Not Track:** Your browser or device may include “Do Not Track” functionality. The information collection and disclosure practices and the choices that we provide to you will continue to operate as described in this privacy policy, whether a Do Not Track signal is received.

**Jurisdiction-specific rights:** You may have certain rights with respect to your personal information depending on your location or residency. Please see “privacy disclosures for specific jurisdictions” below. Please contact us to exercise your rights.

7. Special Information for Job Applicants

When you apply for a job with us, we may collect information from you, including:

• Information you provide in connection with your application.
• Information that you make available in your social media accounts.
• Information about you that is available publicly.
• Information that you authorize us to collect via third parties, including former employers or references.

In certain circumstances, you may submit your application for employment through a third-party service that displays our job posting. We do not control the privacy practices of these third-party services. Please review their privacy policies carefully prior to submitting your application materials.

8. Other Important Information

8.1. Data retention

We may store information about you for as long as we have a legitimate business need for it.

8.2. Cross-border data transfer

We may collect, process, and store your information in the United States and other countries. The laws in the United States regarding information may be different from the laws of your country. Any such transfers will comply with safeguards as required by relevant law.
8.3. **Information about children**

The Services are intended for users age thirteen and older. We do not knowingly collect information from children. If we discover that we have inadvertently collected information from anyone younger than the age of 13, we will delete that information. Please contact us with any concerns.

8.4. **Sharing of Medical or Health Information**

To the extent that we receive protected health information about you, that information is subject to electronic disclosure to the extent permitted by applicable law.

9. **Privacy Disclosures for Specific Jurisdictions**

9.1. **European Economic Area, United Kingdom, and Switzerland**

We process “personal data,” as that term is defined in the European Union’s General Data Protection Regulation (“GDPR”).

**Your rights under the GDPR:** Users who are located in the European Economic Area (“EEA”), U.K., or Switzerland have the right to lodge a complaint about our data collection and processing actions with the supervisory authority concerned. Contact details for data protection authorities are available here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

If you are located in the EEA, U.K., or Switzerland, you have the following rights.

- Access and Portability: Request access to personal data we hold about you or request transmission of your data to a third party.
- Correction: Request that we rectify inaccurate or incomplete personal data we store about you.
- Erasure: Request that we erase personal data when such data is no longer necessary for the purpose for which it was collected, when you withdraw consent and no other legal basis for processing exists, or when you believe that your fundamental rights to data privacy and protection outweigh our legitimate interest in continuing the processing.
- Restriction of processing: Request that we restrict our processing of personal data if there is a dispute about the accuracy of the data; if the processing is unlawful; if the processing is no longer necessary for the purposes for which it was collected but is needed by you for the establishment, exercise or defense of legal claims; or if your request to object to processing is pending evaluation.
- Objection to processing: Object to processing of your personal data based on our legitimate interests or for direct marketing (including profiling). We will no longer process the data unless there are compelling legitimate grounds for our processing that override your interests, rights, and freedoms, or for the purpose of asserting, exercising, or defending legal claims.
- Transfers: Obtain information about and a copy of the safeguards we use to transfer personal data across borders.

Please contact us to exercise these rights.
9.2. California

Your California Privacy Rights; “Shine the Light” Law

California residents are entitled once a year, free of charge, to request and obtain certain information regarding our disclosure, if any, of certain categories of personal information to third parties for their own direct marketing purposes in the preceding calendar year. Please contact us to obtain this information.

California Consumer Privacy Act

The California Consumer Privacy Act ("CCPA") provides California residents with rights to receive certain disclosures regarding the collection, use, and disclosure of information about them, as well as rights to know/access, correct, delete, and limit disclosure of personal information. You have the right to be free from discrimination based on your exercise of your CCPA rights. To the extent that we collect personal information that is subject to the CCPA, that information, our practices, and your rights are described below.

Notice at Collection Regarding the Categories of Personal Information Collected

You have the right to receive notice of the categories of personal information we collect and the purposes for which we use personal information. The following table summarizes the categories of personal information we collect, the categories of sources of that information, and whether we disclose or sell that information to service providers or third parties, respectively. The categories we use to describe personal information are those enumerated in the CCPA. We collect this personal information for the purposes described in “how we use information.”

<table>
<thead>
<tr>
<th>Category</th>
<th>Information Type</th>
<th>Source</th>
<th>We disclose to:</th>
<th>We sell to/share with:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Identifiers</td>
<td>Contact information or personal characteristics (name; email address; postal address; telephone number; signature)</td>
<td>You; our social media pages; third party subscription service providers</td>
<td>Service Providers</td>
<td>Business partners</td>
</tr>
<tr>
<td></td>
<td>Social media handles</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Financial Information</td>
<td>Payment card data</td>
<td>You</td>
<td>Service Providers</td>
<td>Not sold</td>
</tr>
<tr>
<td></td>
<td>Bank account information</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Credit information</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Protected Classifications and Other Sensitive Data</td>
<td>Date of Birth</td>
<td>You</td>
<td>Service Providers</td>
<td>Not sold</td>
</tr>
<tr>
<td></td>
<td>Gender</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Geolocation Information</td>
<td>Coarse (information that describes location at ZIP code-level or less precision)</td>
<td>You; our analytics and advertising partners</td>
<td>Service Providers</td>
<td>Advertising partners</td>
</tr>
<tr>
<td>Internet or Electronic Network Activity Information</td>
<td>IP address</td>
<td>You; our analytics and advertising partners</td>
<td>Service Providers</td>
<td>Advertising partners</td>
</tr>
<tr>
<td></td>
<td>Device identifier (e.g., MAC)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Advertising identifier (e.g., IDFA, AAID)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Information provided in URL string (e.g., search keywords)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Cookie or tracking pixel information</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Information about your interaction with our website, app, email correspondence, or products</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Browsing history</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Search history</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Diagnostic information (e.g., crash logs, performance data)</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information

- Photographs
- Video

You
Service Providers
Not sold

Professional or Employment-Related Information*

- Current employer
- Job title

You
Service Providers
Not sold

Education Information*

- Education history
- Level of education

You
Service Providers
Not sold

Inferences Drawn About You

- User profile reflecting preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes

You; our analytics and advertising partners
Service Providers
Advertising partners

Content of Communications

- Contents of phone calls, emails, or text messages
- Photos

You
Service Providers
Not sold

Contacts

- List of contacts that you supply to us, such as through a refer-a-friend promotion

You
Service Providers
Not sold

*This information is collected about job applicants.

We determine the retention period for each of the categories of personal information listed above based on (1) the length of time we need to retain the information to achieve the business or commercial purpose for which it was obtained, (2) any legal or regulatory requirements applicable to such information, (3) internal operational needs, and (4) any need for the information based on any actual or anticipated investigation or litigation.

Entities to whom we disclose information for business purposes are service providers, which are companies that we engage to conduct activities on our behalf. We restrict service providers from using personal information for any purpose that is not related to our engagement.

Entities to whom we “sell” information are third parties. Under the CCPA, a business “sells” personal information when it discloses personal information to a company for monetary or other benefit. A company may be considered a third party either because we disclose personal information to the company for something other than an enumerated business purpose under California law, or because its contract does not restrict it from using personal information for purposes unrelated to the service it provides to us.

Your rights under the CCPA

- **Opt out of sale or sharing of personal information:** You have the right to opt out of our sale or sharing of your personal information to third parties. To exercise this right, please visit our Do Not Sell or Share My Personal Information webpage or contact us. Please be aware that your right to opt out does not apply to our disclosure of personal information to service providers.

- **Limit the use and disclosure of your sensitive personal information:** You have the right to limit our use and disclosure of your sensitive personal information if we use such information to infer characteristics about you. We do not use your sensitive personal information for this purpose.

- **Know and request access to and correction and deletion of personal information:** You have the right to request access to personal information collected about you and information regarding the source of that personal information, the purposes for which we collect it, and the third parties and service providers with to whom we sell or disclose it. You also have the right to request in certain circumstances that we delete personal information that we have collected directly from you and to correct personal information that we have collected about you. Please contact us to exercise these rights.
Financial Incentives. We may offer you the opportunity to participate in special promotions and programs from time to time. Your participation is voluntary. If we provide an offer, we will obtain your consent to collect your Personal Information in connection with your participation. We will use the Personal Information we collect to facilitate your participation in the program and to market to you. If we run the program jointly with a business partner, we may disclose the information to that business partner.

You may opt in to any promotions or programs we offer using the means we present to you, such as an online registration page, at the time we make the offer. You may opt out of the promotions or programs at any time by following the instructions in the “Contact” section.

The program we offer may qualify as a financial incentive program (FIP) under California law. We are required to explain how the value you receive from FIPs is reasonably related to the value that we receive from the Personal Information you provide to us. While we do not assign a monetary value to the Personal Information we collect through our promotions or programs, we may receive value in the form of revenue or customer loyalty. We believe this value is reasonably related to the benefit you receive from participating in our promotions and programs. Our good faith estimate of the value of your Personal Information is based on the revenue generated from activities related to the collection and retention of Personal Information in connection with our promotions or programs less expenses related to providing the benefits offered. This value will vary by individual depending on purchases made, which offers an individual takes advantage of, and many other factors.

9.3. Colorado, Connecticut, Utah, and Virginia

Residents of the States of Colorado, Connecticut, Utah, and Virginia may have the following rights:

- **Opt out of “sales” of personal information and use of their personal information for “targeted advertising,”** as those terms are defined under applicable law.

- **Opt out of “profiling”** under certain circumstances, as defined under applicable law. (Residents of Colorado, Connecticut, and Virginia only.)

- **Confirm processing of and access to personal information** under certain circumstances.

- **Correct personal information** under certain circumstances. (Residents of Colorado, Connecticut, and Virginia only.)

- **Delete personal information** under certain circumstances.

Residents of these states can exercise their rights by contacting us at using one of the methods listed below.

9.4. Nevada

Residents of the State of Nevada have the right to opt out of the sale of certain pieces of their information to third parties. Currently, we do not engage in such sales. If you are a Nevada resident and would like more information about our data sharing practices, please contact us.
10. Contact information, submitting requests, and our response procedures

10.1. Contact

Please contact us if you have questions or wish to take any action with respect to information to which this privacy policy applies.

Email: LegalAffairs@pmi-worldwide.com
Telephone: (206) 557 - 6270
Mail: Pacific Market International, LLC
      2401 Elliott Avenue, 4th Floor
      Seattle, WA 98121

10.2. Making a request to exercise your rights

Submitting requests: You may request to exercise your rights by submitting the form on this page or making a request using the contact information above.

If you are a California resident, you may authorize another individual or a business registered with the California Secretary of State, called an authorized agent, to make requests on your behalf.

We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

Verification: We must verify your identity before responding to your request. We verify your identity by asking you to provide personal identifiers that we can match against information we may have collected from you previously. We may need to follow up with you to request more information to verify identity.

We will not use personal information we collect in connection with verifying or responding to your request for any purpose other than responding to your request.

10.3. Appeals

Residents of Colorado, Connecticut, and Virginia may have the right to appeal a denial of their request by contacting us as described in the notice of denial.