

**CARPENTER BOOT COMPANY**  
**PRIVACY AND COOKIE POLICY**  
**Last Updated: August 1, 2018**

Welcome to Carpenter Boot Company, or CBC. At CBC we take our responsibility for caring for your privacy seriously. This policy describes what information CBC collects and uses when you use our Website and services.

## **1. Information We Collect**

The information we collect depends on what features of our website you use and how you use them. We collect some information from you when you provide it to us directly, such as via an online form or when you talk with our customer support team. We and third parties also use certain technologies described below to collect information to deliver excellent experiences.

### **A. Information You Give Us Directly**

We collect information you provide us, including:

- Email address, shipping address, and telephone number;
- Security questions and answers;
- Details you provide in response to surveys about our products;
- Information you provide when seeking help from us such as your name, telephone number and records of the issues you experience; and
- Billing information, such as your name, payment card number and payment account details;

We may offer social features on our Website. If you participate in those features, the information that you disclose may become publicly available. It also may be read, copied, collected or used by other users.

### **B. Other Information We Collect When You Use Our Website**

We collect other information automatically when you use our Website, including:

- IP address;
- Mobile and other hardware or device identifiers;
- Browser information, including your browser type and the language you prefer;
- Referring and exit pages, including landing pages and pages viewed;
- Details about what CBC Products you browse and purchase as well as details about what CBC Website features you utilize;

## **C. Cookies and Similar Technologies**

We also may collect and store information locally on your device, using mechanisms like cookies and similar technologies.

Cookies are small text files stored on your Internet browser. We use cookies and similar technologies to help us understand things like what web pages, features or ads you view and what products you order. This information helps us keep track of your shopping cart, measure the effectiveness of our advertising, make sure you don't see the same ad repeatedly and otherwise help enhance your user experience.

You can disable cookies, limit the types of cookies you allow, or set your browser to alert you when cookies are being sent. Please refer to guidance provided by your individual web browser if you'd like help in managing your cookie preferences.

## **D. Information Provided To Us By Third Parties**

We may receive information from third parties, like Facebook, Instagram and Twitter, when you use these services in connection with our Website or Products.

We also may receive information from third parties to supplement the information we receive from you. We use information from these companies primarily to help us deliver relevant advertising to you. We also may use information from third parties, for instance, to help us understand your approximate geolocation via your IP address for tax purposes, or to customize certain services to your location, and for fraud and/or abuse prevention purposes.

We may also receive information about you when other CBC consumers choose to refer a friend or contact with us.

## **2. How We Use Your Information**

We use your personal and non-personal information, both individually and combined together, in the following ways:

### **To operate our business and to enhance and personalize your experience including to:**

- Operate, protect, improve, personalize, and develop our products, services, and Website;
- Help you tell your friends and teammates about a CBC Product;
- Facilitate communication and sharing on our Website and social networks;
- Serve and measure the effectiveness of advertising;
- Set up and maintain the contact and shipping information you provide us;
- Set up loyalty, discount and rebate programs;

- Identify, fix, and troubleshoot bugs and service errors;
- Adhere to your preferences and to deliver dynamic content;
- Resolve disputes, investigate and help curb fraud, spam, abuse, security incidents, illegal behavior, and other harmful activity; and
- Comply with the law, and to enforce our agreements and policies, including our Terms of Sale and User Agreement

**To provide you support, including to:**

- Help identify and troubleshoot problems with your order or use of our Website;
- Survey your opinions through surveys or questionnaires;
- Communicate with you and respond to your specific requests or questions; and
- Manage and send you confirmations and important information about your order, purchases, returns or cancellations, warranties, manuals, rewards, and products.

**To personalize our communications with you, including to:**

- Present offers and/or information relating to CBC Products you might like;
- Make recommendations to you; and
- Personalize advertising for you and deliver targeted marketing, service updates and promotional offers.

### **3. Legal Basis for Processing**

We rely on a number of legal grounds to process information about you. For example, we will process information about you where we have your consent, where we have a legitimate interest to do so, where the processing is necessary for the performance of a contract with you, and where we have a legal obligation to process your information. For example, we rely on our legitimate interests to serve targeted marketing and on contractual necessity to process information when you order a CBC product on our Website. To learn more about the legal grounds on which we rely to process your information for any particular purpose, please contact us via the options in Section 10 below.

### **4. Information We Share with Third Parties**

**With your Consent:** Where you have instructed us and have provided consent, we share your information, including personal information, as described at the time of consent, such as when you authorize a third party application or website to access your order information or when you participate in promotional activities conducted by CBC or its partners.

We do not knowingly disclose personal information about children under 18 years of age to independent third parties even with consent.

**Compliance, Preventing Harm, and Protecting Our Rights:** We do not share personal information that directly identifies you (such as your name, e-mail or postal address) with third parties for their own use without your consent, unless it is either required by law or we determine that disclosure is reasonably necessary to enforce our rights, comply with our legal obligations, or to protect our consumers or third parties.

**Service Providers:** We employ third parties located in and outside of your country of residence (including outside of the European Economic Area (EEA) to collect or process personal information on our behalf for various reasons, such as operating our Website, conducting market surveys, facilitating credit card processing, or sending emails. When our third party agents or service providers collect or receive personal information, we require that they use the data only on our behalf and for purposes consistent with this policy.

**Merger or Acquisition:** In the event of a reorganization, divestiture, merger, sale or bankruptcy, we may transfer all information we collect to the relevant third party and will obtain your consent to do so if required by law.

**Social Media Platforms:** When third party technologies or social tools are integrated into our products, those third parties may collect information when you use our products. An example is the Facebook "Like" button.

In addition, where permissible according to applicable law we may use certain limited personal information about you, such as your email address, to hash it and to share it with social media platforms, such as Facebook or Google, to generate leads, drive traffic to our websites or otherwise promote our products and services. The social media platforms with which we may share your personal data are not controlled or supervised by CBC. Therefore, any questions regarding how your social media platform service provider processes your personal data should be directed to such provider.

**Aggregate Data:** We may also share anonymous or aggregated information (information about our users that we combine together so that it no longer identifies or references an individual user) and other anonymized information for regulatory compliance, industry and market analysis, demographic profiling, marketing and advertising, and other business purposes.

## **5. Operating Globally**

Personal information we collect may be stored and processed for the purposes set out in this Privacy and Cookie Policy in the United States or any other country in which CBC, its subsidiaries, or third party agents operate. By using our Website, service, or products, you acknowledge that your personal information may be transferred to recipients in the United States and other countries that may not offer the same level of privacy protection as the laws in your country of residence or citizenship.

## **6. Security**

The security of your information is a priority at CBC, and we take a range of measures to help protect it, including encryption of sensitive financial information. Even so, no security measure is 100% perfect. This means we cannot guarantee the security of your information and do not assume any responsibility for the unauthorized use or access to your information under our control.

## **7. Your Choices and Controls**

We give you meaningful choices when it comes to important uses and collection of information. For example, you can update your order information and preferences, choose to opt in or out of CBC marketing emails and choose whether to share your information with select CBC partners.

If you would like to opt out at any time after providing your consent, contact [sales@carpenterbootcompany.com](mailto:sales@carpenterbootcompany.com).

Note that CBC may retain information needed to complete our contractual obligations to you, resolve disputes, enforce our user agreements, protect our legal rights, and comply with technical and legal requirements and constraints related to the security, integrity and operation of our Website, services, and products. Otherwise, we will retain your personal information for as long as reasonably necessary to provide you services, create and improve our products, comply with the law, and to run our business.

You can access the personal information we hold about you. To request access, please contact [sales@carpenterbootcompany.com](mailto:sales@carpenterbootcompany.com). Before we process any request, we may ask you for certain personal information in order to verify your identity.

You may have additional rights under local law, including the right to request erasure or portability of personal information and the right to object to or restrict processing of information. Where applicable, you can exercise these rights by contacting [sales@carpenterbootcompany.com](mailto:sales@carpenterbootcompany.com).

You also may adjust your browser settings to block certain online tracking, such as cookies, as further described in Section 1.

## **8. Third Party Services**

Our Website may include advertising or third party services (such as the Facebook Like button or links to third-party websites). If you click on those links, including an advertisement, you will leave the CBC Website and go to the site you selected. If you visit a third party website or use a third party service, you should consult that site's or service's privacy policy.

We do not control information sent from your browser to third parties, such as advertising networks and analytics companies that receive information in the normal course of your Internet activity.

## **9. Changes to our Policy**

We may update this policy from time to time, so please review it frequently. We'll notify you of material changes via a notice on our home page ([www.carpenterbootcompany.com](http://www.carpenterbootcompany.com)) thirty days before they go into effect. If we are required by applicable data protection laws to give you enhanced notice or seek your consent to any such changes, we will do so. You can see when this policy was last updated by checking the "last updated" date displayed at the top of this policy.

## **10. Contacting Us**

If you have a complaint or question about this policy, please send an email to [sales@carpenterbootcompany.com](mailto:sales@carpenterbootcompany.com). The controller of the personal information processed under this policy is Carpenter Boot Company, LLC., **5761 N. Placita del Trueno, Tucson, AZ 85718 USA**

## **11. Right to Contact a Data Protection Authority**

If you have a concern about how we collect and use information, please contact us. You also have the right to contact your local Data Protection Authority if you prefer. Contact details for Data Protection Authorities in the EU are available at [ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm).