

## **TGG's Privacy Policy**

This version was last updated on July 31, 2020

### **INTRODUCTION**

Welcome to our Privacy Policy for our website, <https://tgg solutions.com> and its related domains ("Website") of T.G.G., Inc. d/b/a TGG Solutions ("TGG" or "we" or "us") in the United States.

We respect your privacy and are committed to protecting your personal data. This Privacy Policy will inform you as to how we look after your personal data when you visit our Website (regardless of where you visit it from) and tell you about your privacy rights.

By using our Website, **you consent to the data practices described in this Privacy Policy.** If you do not agree with the data practices described in this Privacy Policy, you should not use our Website.

#### **1. IMPORTANT INFORMATION AND WHO WE ARE**

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### **1. IMPORTANT INFORMATION AND WHO WE ARE**

At TGG, we have been an industry partner for over 50 years, gaining knowledge, experience and expertise that we utilize to elevate our business model. We tailor our business services to meet your needs and provide you progressive customer services and solutions. We listen to your needs and innovate solutions to help you expand your business.

#### **Purpose of this Privacy Policy**

This Privacy Policy aims to give you information on how TGG collects and processes your personal

data through your use of this Website, including any data you may provide through this Website when you sign up to our newsletter, or purchase a product or service.

This Website is not intended for children and we do not knowingly collect data relating to children consistent with the U.S. Children’s Online Privacy Protection Act. If we learn that we have received information directly from a child under age 13 without the parent or legal guardian’s verified consent, we will use that information only to respond to the child/parent/guardian to inform the child that he or she may not use the Website.

It is important that you read this Privacy Policy together with any other Privacy Policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other policies and is not intended to override them.

### **TGG’s Contact Information**

TGG

Our contact details are:

Matt Darragh, Vice President of Corporate Information Systems:

Email address: mdarragh@tggolutions.com

### **Third-Party Links**

This Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Website, we encourage you to read the Privacy Policy of every website you visit.

## **2. THE DATA WE COLLECT ABOUT YOU**

Personal data, or personal information, means any information about an individual from which that person can be identified.

We or our service providers may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, username or similar identifier, job title, date of birth.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes payment card details, account numbers, expiration dates.
- **Transaction Data** includes details about payments to and from you and other details of

products and services you have purchased from us.

- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this Website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our Website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

### 3. HOW WE COLLECT YOUR PERSONAL DATA

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

**Direct interactions.** You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our products or services;
- create an account on our Website;
- apply for employment as part of our recruitment process
- subscribe to our service or publications;
- request marketing to be sent to you;
- conduct a survey; or
- give us feedback.

**Automated technologies or interactions.** As you interact with our Website, we may automatically collect data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. Please see our cookie policy for further details. Employment application processes are not based on automatic decision-making.

**Third-party sources.** We may receive personal data about you from various third parties including our third-party service providers. We employ other companies and individuals to perform functions upon our behalf. Examples include storing and analyzing data, providing search results and links (including paid listings and links), providing customer service, processing employment applications, and payment processing. They have access to user information needed to perform their functions, but may not use it for other purposes.

### 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances: (a) where we need to perform the contract we are about to enter into or have entered into with you; (b) where it is necessary for our legitimate interests (or those of a third party) and your interests and rights do not override those interests; (c) where we need to comply with a legal or regulatory obligation. We use your data in the following ways:

- To register you as a new guest;
- To process and deliver your order, manage payments, fees, and charges;
- To manage our relationship with you;
- To enable you to complete a survey;
- To administer and protect our Website;
- To deliver relevant Website content and advertisements to you;
- To use data analytics to improve our Website, products/services, marketing, customer relationships and experiences;
- To make suggestions and recommendations to you about goods or services that may be of interest to you.

### **Marketing and Outreach**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing. You can manage the marketing and outreach we provide to you by opting out, which is described in the “Opting Out” section below.

### **Opting Out**

You can ask us to stop sending you marketing messages at any time by replying to a marketing email with “unsubscribe” in the subject line, clicking “unsubscribe” in the marketing email itself, or by *Contacting us* at any time.

### **Cookies**

We may place “cookies” on the browser of your computer. Cookies are small pieces of information that are stored by your browser on your computer’s hard drive. Cookies may enhance the convenience and use of the Website. For example, the information provided through cookies may be used to recognize you as a previous user of the Website (so you do not have to enter your personal information every time), offer personalized information for your use, and otherwise facilitate your experience using the Website. You may choose to decline cookies if your browser permits, but doing so may affect your ability to access or use certain features of the Website.

### **Web Beacons**

We may also utilize web beacons on our Website. A “web beacon,” also known as an Internet tag, pixel tag or clear GIF, links web pages to web servers and their cookies and may be used to

transmit information collected through cookies back to a web server. The information collected through these automated means may include information that we gather and store about your visit to, and use of, the Website, such as your IP address, type of browser and operating system used, date and time you access the Website, pages you visit, and, if you linked to the Website from another website, the address of that website. This data does not include Personal Information and is not treated as Personal Information under this Privacy Policy, but it may include the IP address of your device. We may link an IP address to information that is personally identifiable.

## **5. DISCLOSURES OF YOUR PERSONAL DATA**

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information. This does not include trusted third parties who assist us in operating our site, conducting our business, or servicing you, so long as those parties agree to keep this information confidential. Those trusted third-party partners may:

- Provide you and members with various services
- Provide database maintenance and security
- Help us manage transactions
- Help us process and fulfill orders or requests

We may also release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property, or safety.

## **6. DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **7. DATA RETENTION**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and

sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## 8. YOUR RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent to us processing your personal data.

If you wish to exercise any of the rights set out above, or if you have a complaint please *Contact us*. TGG commits to resolve complaints about our collection or use of your personal information. Inquiries or complaints regarding the processing of personal data should first be directed

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