

Regal Ware, Inc.
Privacy Policy
(Updated June 18, 2020)

Introduction

This privacy policy applies to all personal information that we collect from you or that you provide to us. This includes the online interactions we have with you through the websites and mobile applications of Regal Ware, Inc. and its affiliates, subsidiaries, divisions and brands (collectively, "Regal Ware") and related electronic communications.

We are strongly committed to protecting the privacy of our customers and visitors. The purpose of this policy is to inform you of our policies regarding the collection, use, processing and disclosure of your personal information. Please read this privacy policy carefully to understand our policies regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is to not use our websites or mobile applications. By using our websites or mobile applications, or providing us your e-mail address and other personal information, you agree to the collection and use of your information in accordance with this policy.

This policy may change from time to time. Your continued use of our websites or mobile applications after we make changes is deemed to be acceptance of those changes, so please check this policy periodically for updates.

What Websites Does This Policy Apply To?

This policy applies to information we collect at and through websites owned and controlled by Regal Ware, including but not limited to, www.1919cookware.com, www.ameriankitchencookware.com, www.espro.ca, www.espro.com, www.kitchenfair.com.mx, www.lifetimecookware.com, www.royalqueencookware.com, www.regalware.com, www.saladmaster.com, www.westbendcookware.com and related mobile applications (collectively, the "Website") and related electronic communications..

This policy does not apply to any website owned or operated by or communications sent to you by any third party, even if such third party website or communication links to the Website or if the Website or communication contains links to a third party website. We encourage you to be aware when you leave our Website and to read the privacy statements of those third party websites that may also collect your personal information.

Regal Ware uses third party distributors and dealers to sell our products. This policy does not apply to any website owned or operated by or communications sent by those dealers or distributors. Please be aware that our distributors and dealers have different privacy policies and practices than Regal Ware.

How Do We Collect Information and What Kind of Information Do We Collect?

Certain features on the Website enable potential customers and customers to provide Regal Ware with certain personal information that we may use to contact or identify you. This information may include, but is not limited to, first and last name, e-mail address, phone number, facsimile number, mailing address, billing address, payment information, company name and position or title.

For example, we may collect this information when you register for an account, make a purchase, post a review, send us messages, subscribe to our mailing lists, newsletters or other forms of marketing communications, participate in a survey, click on an ad, redeem a promotion or use some other feature of our Website.

If you browse the Website, regardless of whether you create a user account, purchase any products or services or otherwise interact with the Website, Regal Ware logs your IP address (the internet address of your computer) to tell us which parts of the Website you visit and how long you spend there. Regal Ware will also track the state and/or country you are accessing the internet from, the date and time you visited and the type of computer, operating system and Web browser you are using. Your browser supplies us with this information.

If you contact us through e-mail, we typically retain the e-mail in our file servers and collect any contact information you provide so that we can reply to you and service your account. Your e-mail also contains metafiles that may contain IP addresses, domain names, and other standard file information and this information may be retained electronically on our servers or in routine back-up files.

How Do We Use and Share Your Information?

Regal Ware uses your personal information to answer your questions, provide you with excellent customer service, process and acknowledge orders, sell you our products and services, ship you products, provide you with marketing information about our products and services, improve our Website performance, and other activities in the normal course of manufacturing, marketing and selling cookware.

By sending an e-mail to Regal Ware, making a purchase through a Website, registering or subscribing with the Website, or otherwise providing your contact information to Regal Ware, you authorize Regal Ware to contact you using the contact information you provide, including e-mail, mail, telephone or facsimile.

We may use your e-mail address to notify you about the status of your order, provide customer service information, or to answer your questions and requests. We may also occasionally send you e-mail updates, sales notifications, or other promotional information about our products and services. If you do not want to receive our electronic newsletter or promotional e-mails, you may unsubscribe at any time by clicking on “unsubscribe” at the bottom of any of our promotional e-mails or by contacting us as indicated below.

We use your IP address to learn more about our visitors as a group, not about you as an individual. The information helps us identify overall usage patterns and trends on the Website.

Regal Ware may share personally identifiable or other information with our parent, subsidiaries, divisions, and affiliates.

We may also disclose your personal information to third-parties, including, but not limited to, distributors and dealers, our independent sales network, common carriers and payment processors, to help us market our products and services, process orders, deliver products and otherwise assist us in running our business. For example, if you make a purchase through the Website, Regal Ware will share your information with Regal Ware's payment card processing service provider.

Additionally, Regal Ware may disclose your personal information if required to do so by law or in the good-faith belief that such action is necessary to: (a) satisfy applicable law, a legal order or comply with legal process; (b) defend the rights of Regal Ware or its affiliates or business partners; (c) detect, prevent or otherwise address fraud, security or technical issues or (d) protect against harm to the rights, property or safety of Regal Ware employees, agents, affiliates, business partners, customers or Website users.

If the ownership of all or substantially all of our business changes or we otherwise transfer all or part of our assets relating to our business or the Website to a third-party, such as by merger, acquisition, bankruptcy proceeding, joint venture, partnership or otherwise, we may transfer or sell your personal information to the new owner. In such a case, unless you agree differently or unless otherwise permitted by applicable law, your information would remain subject to the terms and conditions set forth in this privacy policy.

Except as set forth in this policy, Regal Ware will not sell your personal information to any other organization unless you expressly agree to it (typically by checking a box indicating your consent).

Social Media, Cookies, Web Analytics and Aggregated Data

Social Media

Regal Ware is active on social media pages, such as Facebook, LinkedIn, YouTube, Pinterest, Instagram and Twitter, and Regal Ware may integrate social media widgets or features on the Website. These social media companies may recognize you and collect information about your visit to the Website, and they may set a cookie or employ other tracking technologies. Your interactions with those features are governed by the privacy policies of those companies. Regal Ware may display targeted advertising to you through such social media platforms. Such social media companies have interest-based advertising programs that allow Regal Ware to direct advertisements to users who have

shown interest in our products when you visit a social media platform. These advertisements are governed by the privacy policies of those social media companies that provide them.

Cookies

To improve your experience on the Website, we may use “cookies,” web beacons, and other technologies to receive and store certain information when you interact with the Website. Cookies are small text files that the Website may place on your computer as a tool to remember your preferences. When you visit our Website again, the cookie allows our site to recognize your browser. Cookies may store unique identifiers, user preferences and other information, such as your IP address, what pages you visit or how you arrived at our Website. You may refuse the use of cookies by selecting the appropriate settings on your browser; however please note that if you do this you may not be able to use the full functionality of the Website. To learn more about how we use cookies, please visit our Cookies Policy.

Web Analytics

We may use third-party service providers, including but not limited to Google Analytics, to monitor and analyze the use of the Website.

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic to Google servers in the United States. Google Analytics does not identify individual users or associate your IP address with any other data held by Google. We use reports provided by Google Analytics to help us understand Website traffic, and web page usage. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>

Aggregated Data

Regal Ware may take personal and business information and aggregate data so that it is no longer identifiable. Regal Ware may use this information to enhance the features of its Website and services. Regal Ware may also sell or license this aggregated information to third parties or publish the information. Regal Ware will take reasonable precautions to ensure that such aggregated information does not contain any confidential or otherwise identifiable data that could be used to identify its source.

Where Do We Store Your Personal Information?

Regal Ware is based in the United States. Any information collected through the Website or electronic communications as described in this privacy policy may be stored and processed in the United States or any other country in which Regal Ware or its affiliates or service providers maintain facilities. The United States is not recognized as having adequate safeguards. If you are located outside of the United States, please note that we may transfer information, including personal information, to a country and jurisdiction

that does not have the same data protection laws as your jurisdiction, and you consent to the transfer of information to the United States.

How Do We Protect Your Personal Information?

Protecting the safety of your personal information is important to us. We maintain appropriate technical, administrative and physical safeguards designed to protect the personal information you provide against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. Certain pages on the Website may use Secure Sockets Layer (SSL) technology to protect your information as it is transmitted to us. However, SSL technology is not utilized throughout the Website.

However, since no method of Internet transmission is 100% secure, Regal Ware cannot guarantee, ensure or warrant the security of any personal information you transmit to Regal Ware.

For How Long Do We Keep Your Personal Information?

We will keep your personal information until you contact us and tell us to modify or delete it from our servers or until we determine that the personal information is no longer needed to fulfill the purposes for which it was collected. Regal Ware will also retain and use your personal information as necessary to comply with our legal obligations, resolve disputes, protect our assets, and enforce our agreements.

Your Rights in Relation to Our Use of Your Personal Information

You have the right to access, correct, or delete your personal information in certain circumstances. You also have the right to withdraw any consent you have given Regal Ware to process your personal information. If you have questions about the personal information Regal Ware has about you, need to modify, access or delete your information, or want to withdraw your consent for Regal Ware to process your personal information, you can contact us as provided below.

Children's Privacy

Our Website is not directed toward children under 13 years of age. If you are under the age of 13, please do not attempt to use the Website or provide any personal information about yourself. If we learn that we have collected personal information from a child under the age of 13, we will promptly delete that information. If you believe we have collected personal information from a child under the age of 13, please contact us as provided below.

Governing Language

Any translation of this policy is done for local requirements and in the event of a dispute between the English and any non-English versions, the English version of this policy shall govern.

Governing Law and Jurisdiction

Unless otherwise required by applicable law, this policy, and Regal Ware's collection and use of customer information, shall be governed and interpreted in accordance with the laws of the United States and the State of Wisconsin. Any disputes arising out of this policy shall be adjudicated in Milwaukee County, Wisconsin or a federal court of competent jurisdiction in the Eastern District of the State of Wisconsin.

Privacy Policy Changes

Regal Ware reserves the right to change its privacy policy at any time without prior notice. Any changes to the privacy policy will be posted on the Website and will be effective immediately upon posting.

Your California Privacy Rights

This California Privacy Rights NOTICE supplements our privacy policy with regard to visitors, users, and others who reside in the State of California and with regard to personal information collected or disclosed within the State of California. We adopt this notice to comply with the California Consumer Privacy Act of 2018 (the "CCPA") and other applicable California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice.

This notice provides California residents with notice of our practices and notice of their specific rights regarding their personal information. This notice also describes such individuals' rights and how to exercise those rights.

Notice of Categories of Personal Information Collected:

Without limiting the descriptions above regarding what information we may collect, we have collected the following categories of personal information about consumers in the last twelve (12) months via the means described above:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol ("IP") address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender	NO

law.	expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

Notice of Purposes For Categories Of Personal Information Collected:

Without limiting the description of our purposes for collection and use of information described elsewhere in this privacy policy, with respect to the categories of personal information identified in the chart above, we may also use such information for business or commercial purposes as follows:

Category	Purposes
A. Identifiers.	To complete sale and ship product.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	To complete sale and ship product.
C. Protected classification characteristics under California or federal law.	n/a
D. Commercial information.	Warranty, marketing, product, and forecasting purposes
E. Biometric information.	n/a
F. Internet or other similar network activity.	Determine effectiveness of websites and product information
G. Geolocation data.	Local currency conversion and regulatory issues
H. Sensory data.	n/a
I. Professional or employment-related information.	n/a
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	n/a
K. Inferences drawn from other	n/a

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 notice via an update to this policy.

Notice of Sharing of Personal Information:

We may disclose your personal information to a third party for a business purpose. In the preceding twelve (12) months, we have not sold any personal information.

Notice of Your Rights and Choices:

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Right to Know:

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you, at your choice:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling (if applicable) that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you.
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing: (1) sales, identifying the personal information categories that each category of recipient purchased; and (2) disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Right to Delete:

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request in whole or in part if retaining certain information is necessary for us or our service providers to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Your Rights:

To exercise the right to know or the right to delete described above, please submit a verifiable consumer request to us by either:

- Calling us at 1-800-832-5932
- Visiting www.regalware.com
- Emailing us at datarequest@regalware.com

You may only make a verifiable consumer request to exercise your rights under the CCPA twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing, Verification and Format:

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by email. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

When you make a request, we will attempt to verify your request as follows to ensure that we provide your personal information only to you or your authorized representative:

- We will verify your identity using Evident, a privacy-first identity verification platform.

Personal Information Sales Opt-Out and Opt-In Rights

If you are 16 years of age or older, you have the right to direct us to not sell your personal information at any time (the "right to opt-out"). We do not sell the personal information of consumers we actually know are less than 16 years of age, unless we receive affirmative authorization (the "right to opt-in") from either the consumer who is between 13 and 16 years of age, or the parent or guardian of a consumer less than 13 years of age. Consumers who opt-in to personal information sales may opt-out of future sales at any time.

To exercise the right to opt-out, you (or your authorized representative) may submit a request to us by visiting the following web page link:

<https://www.regalware.com/Do-Not-Sell-My-Personal-Information>

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back in to personal information sales at any time by:

- Calling us at 1-800-832-5932
- Emailing us at datarequest@regalware.com

You do not need to create an account with us to exercise your opt-out rights. We will only use personal information provided in an opt-out request to review and comply with the request.

Non-Discrimination:

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Accessibility:

Alternative formats of this privacy policy may be obtained by emailing us at datarequest@regalware.com.

Appointing an Agent:

You may designate an authorized agent to make a request under the CCPA on your behalf.

How Can You Contact Regal Ware?

If you have any questions, concerns or complaints about this policy, please contact us at 1-800-765-5795, or 1675 Reigle Drive, P.O. Box 556, Kewaskum, Wisconsin 53040 USA, or datarequest@regalware.com.

We encourage you to contact Regal Ware if you have concerns regarding this policy or our privacy practices. However, any EU resident who feels we have not resolved a privacy concern related to personal information processed or transferred by Regal Ware has the right to submit a complaint to a supervisory authority.