

**Regal Ware, Inc.**  
**Privacy Policy**  
**Last Updated: July 9, 2021**

## **1. 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," "we," "us," or "our" as the context may require) and related electronic communications.

We are strongly committed to protecting the privacy of our customers and visitors. We have therefore adopted this Privacy Policy to assist and inform individuals ("you" or "your," as the context may require) who visit or use the Services of our policies regarding the collection, use, processing, and disclosure of your personal information. This Privacy Policy describes:

- The types of information we may collect via or that you may provide when you visit, access, use or otherwise interact with the Services, or communicate with us regarding the Services.
- Our practices for collecting, using, maintaining, protecting, disclosing and processing that information.

Please read this Privacy Policy carefully to understand our policies and practices regarding your personal information (as defined below) and how we will treat it. By accessing or using the Services, or by communicating with us regarding the Services, you agree to this Privacy Policy and our [Cookie Policy](#) (collectively the "User Terms"). If you do not agree with our policies, practices, or terms and conditions contained in the User Terms, you may not use or access the Services.

This Privacy Policy may change from time to time (see Section 13). Your continued use of the Services after we make changes is deemed to be acceptance of those changes, so please check this Privacy Policy periodically for updates.

## **2. What Websites Does This Privacy Policy Apply To?**

This Privacy Policy applies to information we collect at and through websites owned and controlled by Regal Ware, including but not limited to, [www.1919cookware.com](http://www.1919cookware.com), [www.ameriankitchencookware.com](http://www.ameriankitchencookware.com), [www.espro.ca](http://www.espro.ca), [www.espro.com](http://www.espro.com), [www.kitchenfair.com.mx](http://www.kitchenfair.com.mx), [www.lifetimecookware.com](http://www.lifetimecookware.com), [www.royalqueencookware.com](http://www.royalqueencookware.com), [www.regalware.com](http://www.regalware.com), [www.saladmaster.com](http://www.saladmaster.com), [www.westbendcookware.com](http://www.westbendcookware.com) and related mobile applications (each a "Site" and collectively, the "Sites"). The Sites, together with all content, functionality, mobile websites, microsites, applications and services offered on or through the Sites and related electronic communications are referred to herein as the "Services."

This Privacy 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 Services

or if the Services contain links to a third party website. We encourage you to be aware when you leave the Services 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 Privacy 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.

### **3. How Do We Collect Information and What Kind of Information Do We Collect?**

Certain features on the Services 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 the Services.

If you browse the Sites, regardless of whether you create a user account, purchase any products or services or otherwise interact with the Sites, Regal Ware logs your IP address (the internet address of your computer) to tell us which parts of the Sites 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.

### **4. 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 the Services 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 the Services, registering or subscribing with the Services, 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 Sites.

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 Services, 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 users of the Services.

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 Services 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 Privacy 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).

## **5. 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 Services. These social media companies may recognize you and collect information about your visit to the Services, 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 Services, we may use “cookies,” web beacons, and other technologies to receive and store certain information when you interact with the Services. Cookies are small text files that the Services may place on your computer as a tool to remember your preferences. When you visit the Services 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 the Services. 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 Services. To learn more about how we use cookies, please see our [Cookie 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 Services.

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 Site 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 the Services 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.

## **6. Where Do We Store Your Personal Information?**

Regal Ware is based in the United States. Any information collected through the Services 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.

## **7. 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 Sites may use Secure Sockets Layer (SSL) technology to protect your information as it is transmitted to us.

However, SSL technology is not utilized throughout all parts of the Services. 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.

## **8. 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.

## **9. 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.

If you are a resident of the state of California, please see Section 14 for more information about your rights and choices regarding your personal information.

If you are an individual who is located in the European Economic Area (EEA), please see Section 15 for more information about your rights and choices regarding your personal information.

Nevada residents who wish to exercise their sale opt-out rights under Nevada Revised Statutes Chapter 603A may submit a request to us via the contact methods listed below. However, please know we do not currently sell data triggering that statute's opt-out requirements.

## **10. Children's Privacy**

The Services 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 Services 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.

## **11. Governing Language**

Any translation of this Privacy 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 Privacy Policy shall govern.

## **12. Governing Law and Jurisdiction**

Unless otherwise required by applicable law, this Privacy 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 Privacy Policy shall be adjudicated in Milwaukee County, Wisconsin or a federal court of competent jurisdiction in the Eastern District of the State of Wisconsin.

## **13. Privacy Policy Changes**

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

## **14. Your California Privacy Rights**

### **A. Scope; Definitions:**

This Section 14 applies exclusively to visitors and users of the Services who are residents of the state of California (as defined in California Consumer Privacy Act, Cal. Civil Code §§ 1798.100 to 1798.199, as amended, and including all regulations promulgated thereunder (the "CCPA")) (such residents of California, "Consumers" and each a "Consumer"). As used in this Section 14, the term "you" and "your" shall only refer to a Consumer. For purposes of this Section 14, "personal information" has the meaning set forth in the CCPA.

If you are a Consumer, the CCPA provides you with certain rights regarding your personal information. This Section 14 includes additional notices with respect to and describes those rights and provides you with additional information regarding our practices regarding the collection, use, disclosure, and sale of personal information.

This Section 14 supplements the information contained elsewhere in this Privacy Policy with respect to (but only with respect to) Consumers, and notifies Consumers of certain rights they have under the CCPA.

## B. Personal Information We Collect:

Without limiting the descriptions provided elsewhere in this Privacy Policy 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 of Personal Information	Examples
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.
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.
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
G. Geolocation data.	Physical location or movements.

## C. Sources of Personal Information

We may collect your personal information from the categories of sources of personal information identified in Section 3.

## D. Use of Personal Information

We may collect, use, maintain, disclose, and otherwise process your personal information for the business and/or commercial purposes identified in Section 4.

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.

D. Commercial information.	Warranty, marketing, product and forecasting purposes
F. Internet or other similar network activity.	Determine effectiveness of websites and product information
G. Geolocation data.	Local currency conversion and regulatory issues

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 Privacy Policy.

**E. Sharing of Personal Information:**

We do not sell personal information. In the preceding twelve (12) months, we have not sold any personal information.

We may share your personal information by disclosing it to a third party for a business purpose. We only make these business purpose disclosures under written contracts that describe the purposes, require the recipient to keep the personal information confidential, and prohibit using the disclosed information for any purpose except performing the contract. We may disclose, and in the preceding twelve (12) months have disclosed, personal information for a business purpose to the categories of third parties indicated in the chart below.

Category	Category of Third-Party Recipients
	Business Purpose Disclosures
A: Identifiers.	Service providers. Internet service providers. Operating systems and platforms. Internet cookie data recipients, like Google Analytics.
B: California Customer Records personal information categories.	None
D: Commercial information.	None
F: Internet or other similar network activity.	None
G: Geolocation data.	None

**F. Notice of Your Rights and Choices:**

The CCPA provides Consumers with specific rights regarding their personal information. This Section 14.F describes your CCPA rights and explains how to exercise those rights.

- (i) Right to Opt-out of the Sale of Personal Information

You have the right to direct us to not sell your personal information at any time (the "Right to Opt-Out"). We do not collect, and therefore do not sell, the personal information of Consumers we actually know are less than eighteen (18) years of age. Consumers who opt-in to personal information sales may opt-out of future sales at any time.

As we do not sell personal information, we do not currently provide a method for opting out of the sale of personal information.

(ii) Right to Know; Data Access and Portability Requests

You have the right to request that we disclose certain information (the "Right to Know") to you about our collection, use, disclosure, of your personal information over the past twelve (12) months (a "Request to Know").

Once we receive and verify your Request to Know (see Section 14.G), we will disclose to you each of the following items which you include in your Request to Know:

- The categories of personal information we have collected about you;
- The categories of sources for the personal information we have collected about you;
- Our business or commercial purpose for collecting or selling that personal information;
- The categories of third parties with whom we have shared that personal information;
- The specific pieces of personal information we have collected about you; (if delivered to you electronically in a portable format, a "Data Portability Request," if delivered to you by other means, a "Data Access Request");
- If we have sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - sales, identifying the personal information categories that each category of recipient purchased; and
  - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

For information on how to submit a Request to Know, Data Access Request, or Data Portability Request, see Section 14.G.

The CCPA temporarily exempts personal information reflecting a written or verbal business-to-business communication ("B2B Information") from some of its requirements. To the extent permitted by the CCPA, we may deny a Request to Know, Data Access Request, or Data Portability Request relating to B2B Information.

(iii) Right to Request Deletion

You have the right to request that we delete any of your personal information that we have collected from you or have maintained or retained, subject to certain exceptions (a "Request to Delete"). Once we receive your request and confirm your identity (see Section 14.G), we will review your request to see if an exception allowing us to retain the information applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- 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, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- 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.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

To the extent permitted by the CCPA, we may deny a Request to Delete relating to B2B Information.

(iv) Right to Non-Discrimination

You have the right to not receive discriminatory treatment for your exercise of privacy rights under the CCPA, by, for example, being denied goods or services or being charged different prices for goods or services because of your exercise of CCPA rights.

Unless permitted by the CCPA, we will not do any of the following based upon your exercise of privacy rights under the CCPA: (a) deny you goods or services; (b) charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties; (c) provide you a different level or quality of goods or services; or (d) suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

(v) Authorized Agents

You may authorize another person (an "Authorized Agent") to exercise any of your rights under the CCPA. To designate an Authorized Agent to make a request with us, (i) provide the Authorized Agent signed permission to submit a request under this Section 14 with us, and (ii) confirm with us that you provided the Authorized Agent permission to submit the request by submitting such signed permission to us by email at [datarequest@regalware.com](mailto:datarequest@regalware.com). Please note that you may be required to verify your identity prior before your confirmation of permission for the Authorized Agent is effective under this Section 14.

## **G. Exercising Your Rights:**

To exercise the access, data portability, and deletion rights described in Section 14.F, please submit a verifiable consumer request to us by either:

- Calling us at 1-800-832-5932
- Visiting [www.regalware.com](http://www.regalware.com)
- Emailing us at [datarequest@regalware.com](mailto:datarequest@regalware.com)

Only you or your Authorized Agent may make a verifiable consumer request related to your personal information. You may only make a Request to Know, Data Access Request, or Data Portability Request twice within a twelve (12) month period. Your Request to Know, Data Access Request, or Data Portability 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 of such person, which may include:
  - Information which we already maintain; or
  - If we cannot verify your identity based on information already maintained by us, such information that we or our representatives request from you.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within this timeframe, please contact us as provided in [Section 14](#).

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. If we cannot verify your request within forty-five (45) days from the date that we receive your request, we may deny your request.

Making a verifiable consumer request does not require you to create an account with us. However, we do consider requests made through your password protected account sufficiently verified when the request relates to personal information associated with that specific account.

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.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

When you make a request, we will attempt to verify your request using Evident, a privacy-first identity verification platform, in order to attempt to ensure that we provide your personal information only to you or your authorized representative.

## **H. Other California Privacy Rights**

California's "Shine the Light" law (Cal. Civil Code § 1798.83) permits Consumers to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. We do not currently disclose personal information to third parties for their direct marketing purposes.

### **15. Notices for Individuals Located in the EEA**

#### **A. Scope**

This Section 15 applies exclusively to visitors and users of the Services who are located in the EEA ("Data Subjects").

#### **B. Rights of Data Subjects**

If you are a Data Subject, you have the following rights:

- The right to request copies of your personal information. If you require more than one copy, we may charge you a reasonable fee.
- The right to request that we correct any personal information that you believe is inaccurate, or complete any personal information which you believe is incomplete.
- The right to request that we erase your personal information, under certain circumstances.
- The right to request that we restrict the processing of your personal information, under certain circumstances.
- The right to object to our processing of your personal information, under certain circumstances.
- The right to request we transfer data that we have collected to you or directly to another organization, under certain circumstances.
- The right to withdraw your consent, explicit or otherwise, at any time. If we rely on your consent as the legal basis for our processing of your personal information, we will refrain from processing your data.

For the purposes of European data protection laws, Regal Ware is the data controller (i.e., responsible for controlling the processing of personal information covered by this Privacy Policy). If you are a Data Subject and would like to exercise any of the foregoing rights, please contact us as provided in [Section 14](#).

#### **C. Transfer of Personal Information**

The Sites and the Services are operated and managed on servers located and operated within the United States. Any information collected through the Services as described in this Privacy Policy may be stored in the United States or any other country in which Regal Ware or its service providers maintain facilities. The United States is not recognized as having adequate safeguards under European law. 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 your personal information to the United States as described in this Privacy Policy.

## **16. How Can You Contact Regal Ware?**

If you have any questions, concerns or complaints about this Privacy 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](mailto:datarequest@regalware.com).

We encourage you to contact Regal Ware if you have concerns regarding this Privacy 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.