

## **CROWN PRIVACY POLICY**

#### PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how Crown Building Products, LLC, Crown Building Products of Florida, LLC, dba Crown Roof Tiles collects and processes your personal data through your use of this website, including any data you may provide through this website when you purchase a product or service.

Our website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice 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 notice supplements the other notices and is not intended to override them.

This Website Privacy Policy (Policy) applies to this website www.crownrooftiles.com, (collectively "we," "us" or "our") that link to this Policy (each a Site and collectively, the Sites). This Policy describes how we, use, and share information about you.

The Sites are intended for a U.S. audience. If you access our Sites from outside the United States, your information may be transferred or processed in the United States.

This Policy only applies to the Sites and does not apply to information collected or received by other means. This Policy does not apply to services or websites offered by third parties, even if this Site links to those services or third parties.

# 1. INFORMATION WE COLLECT AND/ RECEIVE

We may collect information that you provide to us when you visit our Sites, including information you provide:

- **Identity Data** includes first name, last name, job title, gender and username or similar identifier including car registration number and CCTV images.
- **Contact Data** includes billing address, delivery addresses, site addresses, branch addresses, email addresses, current employer and telephone numbers.
- Financial Data includes bank account and payment card details.
- 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, information viewed or requested by you, sales enquiries from you, fixing specifications created by you and any account preferences.
- 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.



We also collect, use, and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal information which will be used in accordance with this privacy notice.

# IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

# 2. HOW IS YOUR PERSONAL DATA COLLECTED?

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

**Direct interactions**. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us through our Contact area. This includes personal data you provide when you:

- provide health & safety information such as Risk Assessments or Method Statements or similar:
- request a sample through our website or via fax, email, telephone or in person;
- request a quotation through our website or via fax, email, telephone or in person;
- ask for information or guidance using our Ask the Experts area;
- ask for information or guidance directly from our sales, technical or other teams;
- create an account on our website;
- subscribe to our E-Bulletins or other publications;
- request marketing to be sent to you;
- submit a CV or job application;
- report a problem with our website; or
- give us some feedback.

**Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy, which is available on our website for further details.

**Information from Other Sources.** We may obtain information about you from third parties. This information may include information about your use of our Sites or services, your use of other websites, your interests and preferences, and other information. For example, we may collect information about your browsing and usage history on our Sites. We may combine the information we obtain from third parties with information that we or our affiliates have collected about you.



### 3. 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:

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Please see below to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us using the contact details above.

#### 4. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process your job application	(a) Identity (b) Contact (c) Financial	(a) Performance of a contract with you (b) Necessary to comply with a legal or regulatory obligation e.g. Employment Law and Health & Safety
		(c) Necessary for our legitimate interests (to employ the best applicant for each vacancy)



To process and deliver your order including:  (a) Manage payments, fees and charges	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (e.g. to recover debts due to us, or for health & safety considerations)
(b) Collect and recover money owed to us	(e) Marketing and Communications	30455
To manage our relationship with you which will include:  (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	<ul> <li>(a) Performance of a contract with you</li> <li>(b) Necessary to comply with a legal or regulatory obligation e.g. Health &amp; Safety</li> <li>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services</li> </ul>
To administer and protect our business including our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	<ul> <li>(a) Necessary for our legitimate interests</li> <li>(e.g. for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise)</li> <li>(b) Necessary to comply with a legal or regulatory obligation (e.g. Health &amp; Safety)</li> </ul>
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

# PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You may receive marketing communications from us if you have requested information from us or purchased goods or services from us and, in each case, you have not opted out of receiving that marketing.



#### **CHANGE OF PURPOSE**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### 5. DISCLOSURES OF YOUR PERSONAL DATA

We may share with others the information that we collect or receive, including:

- · our corporate affiliates;
- service providers or business partners who we engage to provide services offered through our Sites or on our behalf, including providers who help us operate our business, develop products, and fulfill orders; and
- marketing partners, including marketing and public relations firms, analytics companies and advertising networks who provide Data Technologies on our Sites.
- Other parties may collect personally identifiable information about your online activities
  over time and across different websites when you use our Sites. In addition, we may
  share information we have collected from you, including personal information, in
  connection with the sale or merger of our business or the transfer of assets.
- We may also use and share information in order to:
- protect or defend our (and our affiliates') interests, legal rights or property;
- protect the rights, interests, safety and security of users of this and other websites and services we make available;
- protect the rights, interests, safety and security of members of the public;
- combat fraud, theft, and or injury, or for risk management purposes; and
- comply with prudent legal, data privacy, or data security practice as we may determine, or to comply with applicable law or legal process.

# 6. DATA SECURITY

#### **SECURITY MEASURES**

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.



#### **KEEPING YOUR CREDENTIALS SAFE**

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

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. DO-NOT-TRACK DISCLOSURE

As of today, there is no commonly accepted response for Do Not Track signals initiated by browsers. Therefore, we do not respond to such signals or to other mechanisms that provide the ability to exercise choice regarding the collection of personally identifiable information regarding your online activities over time and across third party websites or online services.

# 8. UPDATES TO THIS POLICY

We may sometimes update this Policy. When we modify this Policy, we will update this web page.

## 9. CONTACTING US

You can contact us with questions or comments about our privacy practices or this Policy by emailing us at admin@crownrooftiles.com.