

## Genuine Cable Group, LLC Privacy Policy

Genuine Cable Group, LLC, its subsidiaries, and affiliates (collectively “GCG”, “we”, “us”), care deeply about privacy, security, and online safety. This Privacy Policy (“**Privacy Policy**”) is designed to inform you about how we collect, use, and disclose your Personal Data (as defined below), and our commitment to using the Personal Data we collect in a transparent and respectful manner.

Please read this Privacy Policy carefully. This Privacy Policy applies to Personal Data (as defined below) we obtain from individuals (“**you**”) through our website (collectively, our “**Site**”), products, and services (collectively, the “**Services**”), and from third party and publicly available sources, as further described below. Please read this Privacy Policy carefully before you start to use our Services, whether online or offline. When referenced in this Privacy Policy, the term “**Personal Data**” (*i.e.*, Personal Information or other similar terms as defined by applicable law) includes any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household, including any information that is subject to applicable data protection laws.

GCG is the controller (*i.e.*, responsible party) for the Personal Data practices described in this Privacy Policy. However, we also provide and administer the Services on behalf of customers and act as a processor or service provider relative to such customers. This Privacy Policy may not apply in that regard, and we recommend that you review the privacy policy of such third-party customers with whom you are dealing directly as they will be responsible for the handling of your Personal Data.

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### INFORMATION WE MAY COLLECT

The types of Personal Data we collect about you depends on how you interact with us. Depending on the Services you use, the following are the categories and specific types of Personal Data that we may collect, or have collected in the preceding twelve months:

- **Contact Information/Identifiers**, including name, email address, postal address, phone number, username, business contact information, or other similar identifiers and account information.
- **Government Identifiers**, including driver’s license number (which, in certain instances, may be considered sensitive Personal Data).
- **Information Specific to the Services**, in certain instances, such as invoices, business and commercial communications, order status and history.

- **Demographic Information**, including age and gender, some of which may include characteristics of protected classifications under state or federal law.
- **Device Information and Other Unique Identifiers**, device identifier, internet protocol (IP) address, or similar unique identifiers.
- **Internet or Other Network Activity**, including browsing or search history, and information regarding your interactions with our websites, mobile applications, emails, or advertisements.
- **Geolocation Data**, including information that permits us to determine your location, such as if you manually provide location information or enable your mobile device to send us precise location information.
- **Payment Information**, including credit or debit card number, or other financial information.
- **Inferences**, inferences drawn from or created based on any of the information identified in this section.
- **Aggregated or Deidentified Data**, derived from the Personal Information listed above.

We do not collect sensitive or special Personal Data through our Site. If you provide us with sensitive or special Personal Data, the provision of that Personal Data is voluntary.

If you do not provide us with certain Personal Data, we may not be able to fulfill the requested purpose of collection, such as to respond to your queries or request for customer service or to provide the full functionality of our Site or Services to you. However, unless otherwise specified, not providing your Personal Data will not result in legal or other consequences to you.

Where we aggregated or deidentify your Personal Information, that data is generally not treated as Personal Information under applicable law. We will not take steps to reidentify aggregated or deidentified information about you, except that we may do so to test whether our deidentification procedures comply with applicable law.

## SOURCES OF PERSONAL DATA

We collect your Personal Data in the following ways, pursuant to applicable law:

- **Directly From You**, such as when you use our Services, create an account and profile with us; sign up with us to receive marketing communications; or otherwise reach out to us.
- **Other Sources**, including vendors, affiliates, and through tracking technologies. To learn more about our use of cookies and similar tracking technologies, please review the “Cookies and Other Tracking Technologies” section below.

## USE AND PROCESSING OF YOUR PERSONAL DATA

We use your Personal Data and sensitive Personal Data for the following purposes associated with our general business operations. We may collect your Personal Data for the following purposes:

- To provide you the Services.
- To enable you to access and use our Site.
- To communicate with you and to respond to your requests, questions, comments, and other inquiries.
- To understand what partner resources you use, if any, and to connect you to additional resources at your request.
- To offer you personalized advertisements, which you may be able to opt out of as explained in the “Your Privacy Rights and Choices” section below.

- To send marketing and promotional materials, including information relating to our products, Services, sales, or promotions or those of a third party.
- To administer, maintain, evaluate, and improve our Sites and Services, and to develop new products and services.
- To conduct research and analytics related to our Sites and Services.
- We may use Personal Data for marketing and promotional purposes to show you advertisements for products and/or services tailored to your interests on social media and other websites.
- To manage our business operations, perform our obligations and exercise our rights under any agreement that you or your organization has with us.
- For other purposes with your consent, or as otherwise permitted or required by applicable law.
- We use Personal Data to comply with our legal or regulatory obligations, to establish or exercise our rights, and to defend against a legal claim.
- We use Personal Data to detect, investigate, prevent, or take action regarding possible malicious, deceptive, fraudulent, or illegal activity, including fraudulent transactions, attempts to manipulate or violate our policies, procedures, and terms and conditions, security incidents, and harm to the rights, property, or safety of GCG and our users, customers, employees, or others.
- With regard to sensitive Personal Data you provide, if any, we only use your sensitive Personal Data to provide you with the requested products or Services, to administer your account or application, or with your consent.

#### **DISCLOSURE OF YOUR PERSONAL DATA**

We respect the importance of privacy. Other than as provided in this Privacy Policy, we do not sell your Personal Data, nor do we share it with unaffiliated third parties for their own marketing use, unless we have your consent, or we are required by law to do so. Generally, we may disclose the Personal Data we collect to facilitate our communications with customers, to operate our business, to advertise or promote our Services, or with your consent. To the extent that we have collected or processed your Personal Data in the prior twelve (12) months, we may have disclosed the above-listed Personal Data as described below.

We may disclose each category of Personal Data listed above to third parties in the following ways:

- **Service Providers.** We may disclose Personal Data to authorized third parties who perform services for us (including cloud services, data storage, sales, human resources, and marketing). Our contracts with our service providers include commitments that they agree to limit their use of Personal Data and to comply with privacy and security standards at least as stringent as the terms of this Privacy Policy. For instance, when you supply your telephone number to us for SMS texting support, we will typically only disclose your telephone number and any related data to third party service providers who facilitate that support, unless otherwise required by applicable law. Remember that if you provide Personal Data directly to a third party, such as through a link on the Site, that processing is typically based on their standards.
- **Affiliated Companies.** We may disclose such Personal Data with subsidiaries, affiliates or strategic partners as needed to provide our products and Services and generally as necessary in the administration of a global organization.
- **Corporate Transaction.** We may disclose your Personal Data in connection with a proposed or actual corporate merger, acquisition, consolidation, sale of assets, bankruptcy, insolvency or other corporate change. Such recipient will be bound by terms and conditions reasonably similar to those set out in this Privacy Policy.
- **Other Parties.** We may disclose your Personal Data to legal, governmental, or judicial authorities, as instructed or required by those authorities or applicable laws, or in relation to a legal activity, such as in response to a subpoena or an investigation of suspected illicit activity. We may also

disclose such Personal Data if we believe disclosure is necessary to prevent physical, financial, or other harm, injury, or loss.

- **Deidentified Personal Data.** We may disclose or use aggregated or de-identified data for any lawful purpose. Deidentified information is generally not considered to be Personal Data under applicable laws.
- **Other Disclosures With Your Consent.** We may disclose your Personal Data with your consent to other unaffiliated third parties who are not described elsewhere in this Privacy Policy.
- **Social Media Platforms and Networks.** Some of our Sites have features such as plugins, widgets, or any other tools made available by third parties that may result in information being collected or shared between us and the third party. The third party's use of your information is not governed by this Privacy Policy. You may have the right to opt out of our use of these technologies, as further described in this Privacy Policy.

## LEGAL BASIS OF PROCESSING

We process your Personal Data for the purposes described in this Privacy Policy based on the following legal grounds:

- **With Your Consent:** We ask for your consent to process your Personal Data for specific purposes.
- **When Pursuing Legitimate Interests:** We process your Personal Data for our legitimate interests and those of third parties while applying appropriate safeguards that protect your privacy.
- **To Perform a Contract With You:** We will process your Personal Data when processing of your Personal Data is necessary for the execution or performance of a contract with you.
- **When we have Legal Obligations:** We will process your Personal Data when we have a legal obligation to do so, for example, if we're responding to a legal process or an enforceable government request.

The provision of your Personal Data is partly a statutory requirement and partly a contractual obligation.

## COOKIES AND OTHER ONLINE INTERACTIONS

We use various technologies to collect and store information, including cookies, pixel tags, local storage, such as browser web storage or application data caches, databases, and server logs (collectively for purposes of this section, "cookies"). Cookies are small bits of data cached or stored on your computer or mobile device based on your Internet activity. We may use cookies to monitor individual activity in aggregate to improve the Services and provide features that are tailored to your needs. This section describes how we use cookies and other data-collection technologies and how you can manage cookies that are not required to operate our sites and mobile applications.

We differentiate among cookies that are essential for the technical features of the Services and optional analytics and advertising cookies.

Cookie Type	Description
Essential Cookies	These are cookies that the Services need in order to function, and that enable you to move around and use the Services and features. Without these essential cookies, the Services will not perform as smoothly for you as we would like it to and we may not be able to provide the Services or certain services or features you request. Examples of where these cookies are used include: to determine when you are signed in; to determine when your account has been inactive; and for troubleshooting and security purposes.

Analytics Cookies	Analytics cookies allow us to understand more about how many visitors we have to our Services, how many times they visit us and how many times a user viewed specific pages within our Services. Although analytics cookies allow us to gather specific information about the pages that you visit and whether you have visited our Services multiple times, we cannot use them to find out details such as your name or address. We use Google Analytics. For more information about Google Analytics, please refer to "How Google Uses Information From Sites or Apps that Use Our Services", which can be found at <a href="http://www.google.com/policies/privacy/partners/">www.google.com/policies/privacy/partners/</a> , or any other URL Google may provide from time to time.
Advertising Cookies	Depending on your location and in certain circumstances, GCG may work with third-party online or mobile network advertisers that use cookies to help us manage advertising and measure its effectiveness (such as the Facebook Pixel). These cookies enable third-party ad networks to recognize a unique cookie on your computer or mobile device and may be placed by us or our network advertising firm that works with our third-party network advertiser. The information that is collected and shared by cookies may be linked to the device identifier of the device you are using to allow us to keep track of all the sites and mobile applications you have visited that are associated with the ad network. This information may be used for the purpose of targeting advertisements on the GCG Services and third-party sites or mobile applications based on those interests.

**Your Options**

Most web browsers automatically accept cookies, but you can usually change your browser settings to prevent this. If you disable cookies, your ability to use some features of the Services may be limited. For mobile devices, you may be able to manage certain cookies using your built-in mobile device settings and controls, or the settings also within your mobile application, where applicable. Choices are browser- and/or device-specific. If you clear your cookies from your browser on any of your devices, your choices will need to be reset. You should check how to do this on your device(s) and operating systems.

GCG may participate in advertising networks to display our ads on other websites or mobile applications. Depending on where you live, you may be able to opt out of ad networks interest-based advertising or provide your consent to the same. To learn how to opt out of ad network interest-based advertising in the U.S., please visit [www.aboutads.info/choices](http://www.aboutads.info/choices) and <http://www.networkadvertising.org/choices/>.

In addition, depending on your location and applicable laws, we may give you the option of adjusting your preferences with regard to the categories of cookies we use, such as through a cookie preference center available in the footer of the Sites. When this option is available, you can configure your personal settings on our cookie preference center or via other options that may be available on the relevant Service. If you use a different device to access the same Services, you may need to manage your settings for each separate device you use.

**Do Not Track and Commercially Recognized Opt-Out Signals**

Some web browsers incorporate a Do Not Track (“DNT”) or similar feature that signals to websites that a visitor does not want to have his or her online activity and behavior tracked. Not all browsers offer a DNT option and there is currently no industry consensus for how to recognize or respond to a DNT signal. For that reason, we do not currently respond to these signals. You may also choose to enable online, where available, a universal tool that automatically communicates your opt-out preferences, such as the Global

Privacy Control (“GPC”). We will process the GPC signal as a request to opt-out of the sale or sharing of your Personal Data, as those terms are defined by applicable law.

## **YOUR PRIVACY RIGHTS AND CHOICES**

Depending on where you live, you may have certain rights with respect to your Personal Data. For example, under local applicable laws, including the European Union and the United Kingdom, you may have the following rights:

- **Right of access:** You may have the right to obtain from us confirmation as to whether Personal Data concerning you is being processed, and, where that is the case, to request access to the Personal Data.
- **Right to data portability:** In certain circumstances, you have the right to request that we provide the Personal Data which you provided to us in a structured, commonly used and machine-readable format; and you have the right to transmit such Personal Data to another entity.
- **Right to rectification (right to correct inaccurate information):** You may have the right to request that we correct any Personal Data about you that is inaccurate or supplement any Personal Data that is incomplete.
- **Right to erasure/deletion (i.e., right to be forgotten):** You have the right to request that we delete your Personal Data, under certain conditions.
- **Right to withdraw your consent:** Where our processing is based on your consent, you may have the right to withdraw such consent at any time; however, you may not be able to use the Service or feature for which you are withdrawing your consent once you have withdrawn your consent. Withdrawing your consent will not affect the lawfulness of the processing we conducted prior to your withdrawal.
- **Right to restriction of processing:** You may have the right to request that we restrict the processing of your Personal Data, under certain conditions. In such case, the respective data will be marked and may only be processed by us for certain purposes.
- **Right to object to processing:** You may have the right to object to our processing of your Personal Data, under certain conditions, and we can be required to no longer process your Personal Data.
- **Right to opt-out of the selling or sharing of Personal Data:** We do not, and have not in the preceding 12 months, sold your Personal Data for money. However, we have shared (in this context, share means the use of your Personal Data for cross-contextual behavioral advertising) your Personal Data, which may be treated as a “sale” or “share” under applicable law. Depending on where you are located, such as California, you may have the right to opt-out of the sale or sharing of your Personal Data by updating your cookie preferences, such as through the cookie preference center available in the footer of the Site.
- **Right to limit the use and disclosure of sensitive Personal Data:** We will only use sensitive or special Personal Data as needed for the purposes for which it was collected. If this changes, we will notify you as described in this Privacy Policy, and you may have the right to restrict such additional uses.
- **Right of non-discrimination/retaliation:** Depending on where you are located, such as California, you have the right to not be discriminated against for exercising the privacy rights described in this section. We do not discriminate against individuals who exercise any of their rights described in this Privacy Policy, nor do we retaliate against individuals who exercise these rights.

If you choose to assert any of these rights under applicable laws, we will respond within the time period prescribed by applicable law. Please note that many of the above rights are subject to exceptions and limitations. If we are not able to provide the requested information or make the change you requested, you will be provided with the reasons for such decisions. Under local law, you may be entitled to lodge a complaint with your local data-protection authority.

Your rights and our responses will vary based on your state or country of residency. Please note that you may be located in a jurisdiction where we are not obligated, or are unable, to fulfill a request. In such a case, your request may not be fulfilled.

### **Authorized Agent**

Depending on where you are located, you may designate a person to act on your behalf to submit a verifiable request related to your Personal Data. If you designate an authorized person to submit requests to exercise certain privacy rights on your behalf, we will require verification that you provided the authorized agent permission to make a request on your behalf.

In any circumstances, your request must: (i) provide sufficient information that allows us to reasonably verify that you are the person about whom we collected Personal Data or an authorized representative of that person; and (ii) describe the request with sufficient detail that allows us to properly understand, evaluate, and respond to it. We will only use Personal Data provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

To exercise your rights, please contact us as stated in the "Contact Us" section of this Privacy Policy.

### **Emails and SMS Communications**

If you no longer wish to receive SMS, correspondence, emails, or other communications from us, you may opt-out by contacting us using the contact information provided below, or by following the instructions provided in the communication, where applicable.

### **SMS Communications**

Except to the extent otherwise required by law or this Privacy Policy we do not: (i) pass any individual's consent to receive SMS from us to any third party, or (ii) share phone numbers with third parties for the purpose of allowing those third parties to send SMS.

### **INTERNATIONAL TRANSFERS OF PERSONAL DATA**

The GCG databases and Services where we house Personal Data may be located in the United States and in other countries that may have privacy laws that differ from where you live. Data protection and privacy laws vary among countries, with some considered to provide more protection than others. Regardless of where your Personal Data is processed or stored, we apply the protections described in this Privacy Policy. We also comply with certain legal frameworks relating to the cross-border transfer of Personal Data by implementing appropriate contractual or other measures, including but not limited to, the European Union or United Kingdom Standard Contractual Clauses, where required. Where permitted by applicable law, you may request a copy of such contractual clauses by contacting us using the information set out below.

### **SECURITY**

We use various reasonable safeguards (administrative, organizational, technical, and physical) to protect the Personal Data we collect and process. Our security controls are designed to maintain an appropriate level of confidentiality, integrity, and availability of your Personal Data. Nonetheless, no such measure is 100% effective; therefore, we do not guarantee that your Personal Data will be secure from theft, loss, or unauthorized access or use, and we make no representation as to the reasonableness, efficacy, or appropriateness of the measures we use to safeguard such Personal Data. In the event of an incident that we are required by law to inform you of, we may notify you electronically, in writing, or by telephone, if permitted to do so by law. We encourage you to use caution when using the Internet. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us as specified in the "Contact Us" section below.

## **DATA RETENTION**

The time periods for which we retain your Personal Data depend on the purposes for which we use it and applicable law for the type of data and use. GCG will keep your Personal Data for as long as you are a registered subscriber or user of our Services or for as long as we have a valid business purpose to do so and, thereafter, for no longer than is required or permitted by law. The Personal Data we collect may be stored and processed in servers in the United States and/or other jurisdictions where GCG, or our service providers, have facilities.

## **LINKED THIRD-PARTY SITES**

We may provide links to other third-party websites through the Services solely as a convenience to you. However, such linking does not mean, and should not be interpreted to mean, that GCG endorses, is affiliated with or makes any representations concerning such third-party websites. GCG neither reviews, nor controls, nor is responsible for these third-party sites or any content therein. By using such links, you will leave the Services. If you decide to access any of the third-party sites linked to the Services, you do so entirely at your own risk. GCG shall not be liable for any consequences arising from use of any third-party websites to which the Services link.

## **CHILDREN'S PRIVACY**

We do not knowingly collect Personal Data from children under the age of 13 (or the relevant age in your location). Children are not permitted to use the Services, and we request that children under the age of 13 not submit any Personal Data through the Services. Since information regarding children under the age of 13 is not collected, we do not knowingly distribute Personal Data regarding children under the age of 13. We do not sell Personal Data of children under the age of 16. If your child has submitted Personal Data to GCG, please contact us to request that such information be removed. Once we are aware of information entered by a child, we will exercise commercially reasonable efforts to remove such information from our databases and storage areas.

## **MODIFICATIONS TO THIS PRIVACY POLICY**

It may be necessary for us to modify this Privacy Policy. We will notify all users by posting an amended version of the Privacy Policy on the Services. Such modifications will become effective on the day they are posted. We encourage you to frequently review the Privacy Policy for any modifications.

## **CONTACT US**

If you have questions or comments regarding this Privacy Policy or our privacy practices, please contact us by using the information below. You may also have a right to lodge a complaint with a data protection supervisory authority, depending on where you are located.

**By E-Mail:**     [privacy@gogcg.com](mailto:privacy@gogcg.com)

**By Mail:**       8550 W. Bryn Mawr Ave.  
                  Suite 400  
                  Chicago, Illinois 60631

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