

Privacy Policy for Nelson Brothers' Services

Last updated: December 10, 2018

Welcome. The aim of this Privacy Policy (“Policy”) is to provide an overview of the privacy practices exercised by Nelson Brothers, Inc. its affiliates, and subsidiaries (collectively “Nelson Brothers”, with respect to our websites, mobile applications, or related services (“Service” or “Services”)), unless the privacy policy accompanying an individual Service indicates otherwise.

Your use of our Services is also subject to Nelson Brothers’ Terms of Use [<https://www.nelsonbrothers.com/terms/>]. Throughout this Policy, “us”, “our”, and “we” refers to Nelson Brothers; and “you” or “user” refers to you, and anyone who uses, downloads, visits, purchases from, or subscribes to any of Nelson Brothers’ Services.

We want you to understand our policies and practices when it comes to how we collect, use, and share your information. By using any of our Services, you hereby agree with the practices set out in this Policy.

What information does Nelson Brothers obtain and how is it used?

Information You Provide

You are not required to provide us with any personal information when using our Services. However, if you choose to contact us using any of the hyperlinks available in our Services, we will obtain your email address as well as any other information included in your inquiry.

Automatically Collected Information

We gather certain analytical information from our Services, such as crash reports, to help improve functionality.

Information you provide within the “Tech Tools” portion of our mobile application is stored locally within your device and is not shared with Nelson Brothers.

Is my information shared?

We will share data collected through our Services with third parties only in the ways that are described in this Policy:

- for analytical purposes and to help improve the functionality of our Services (*e.g.* crash reports). These third parties are obligated to provide the same level of protection to any user data that we commit to provide;
- as required by law, such as to comply with a subpoena, or similar legal process;
- when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request; or
- if Nelson Brothers is involved in a merger, acquisition, or sale of all or a portion of any Services; in such a case, you will be notified via a notification sent to your mobile device,

through email, and/or a prominent notice on any related Service of any change in ownership or uses of your information, as well as any choices you may have.

Where does my information go?

- Nelson Brothers is based in the United States and any information we collect from you will be processed in the United States.
- Individuals in the EEA: The United States has not received a finding of “adequacy” from the European Union under Article 45 of the GDPR. We rely on derogations for specific situations set forth in Article 49 of the GDPR in order to transfer your personal information across international borders. In particular, we collect and transfer personal information outside of the EEA only: (i) with your consent; (ii) to perform a contract with you; or (iii) to fulfill other compelling legitimate interests in a manner that does not outweigh your rights and freedoms.

What if I use a link in Nelson Brothers’ Services to visit other websites or applications?

Our Services may contain links to other websites and applications. We are not responsible for the privacy practices of other websites or mobile applications. When you leave any of our Services, we encourage you to read the privacy statements of each and every website or mobile application that collects personal information.

What are Nelson Brothers’ legal bases for processing personal information?

We collect and process personal information about you with your consent, as part of a contractual agreement, or as necessary to provide our Services to you, operate our business, meet our contractual and legal obligations, protect the security of our Services, and fulfill our other legitimate interests.

How long is my information stored?

We store your information for as long as needed: (i) to conduct business with you; (ii) as needed for the purposes outlined in this Policy or at the time of collection; or (iii) as necessary to comply with our legal obligations, resolve disputes, and enforce any agreements.

Can children submit information through Nelson Brothers’ Services?

We do not use any of our Services to knowingly solicit data from or market to children as defined by applicable law. If you believe that we have inadvertently collected information from a child, please contact us so we can promptly obtain parental/guardian consent or delete the information.

How is my information protected?

We provide commercially reasonable physical, electronic, and procedural safeguards to protect information we process through our Services. Please be aware that no security system is foolproof. As a result, we cannot guarantee the security of any information transmitted to us and cannot be responsible for the theft, destruction, misuse, unauthorized access, alteration, or inadvertent disclosure of your information.

What happens when this Policy changes?

We will update this Policy to reflect any changes in our privacy practices. We will notify you of any non-material changes to our Policy by posting it on our Services and indicating at the top the date it was last updated. You are advised to consult this Policy regularly for any changes, as continued use is deemed approval of all changes. Where changes are material, we will notify you by email or through an alert within our Services.

What are my options?

You can stop the collection of information from our Services by uninstalling such Service or discontinuing its use.

To the extent required by applicable law, we provide you with (i) reasonable access to the personal information collected through our Services, and (ii) the ability to revoke consent, correct, export, suspend processing, or delete personal information. You can contact us using the information below to submit a request.

What if I have other questions?

If you have any questions about this Policy or about our privacy practices, please contact us at:

nb.priv.use@nelbro.com

Individuals in the EEA: You have the right to lodge a complaint with a supervisory authority if you believe we have processed your personal information in a manner inconsistent with your privacy rights. We kindly request that you contact us first so that we may address your concern.