

Kapro - Privacy and Cookie Policy

Last Revised: March 29, 2023

Kapro Industries Ltd. and its affiliates (“Kapro”, “we”, “our”) respects your privacy and is committed to protecting your Personal Information (defined below). We believe that you have a right to know our practices regarding the information we may collect and use when you interact with us or use our primary website at www.kapro.com (and its subdomains) (the “Site”). Please read the following carefully to understand Kapro’s practices regarding your Personal Information and how Kapro will handle it.

1. Who we are

In this Privacy and Cookie Policy (“Privacy and Cookie Policy”), references to “Kapro”, or to “we” or “us”, are to Kapro Industries Ltd., which is a registered company in the state of Israel (No. 511414666) at Kibbutz Kadarim, Israel and its American subsidiary, Kapro Tools Inc. (RN 943409560) at 251 Enterprise Dr, Lake Mills, WI 53551, United States. Individuals wishing to contact us about data protection issues may do so by writing to us at the above address or by emailing us at info@Kapro.com.

2. Your acknowledgment of this policy (important, please read!)

This Privacy and Cookie Policy details how your Personal Information is collected, used and otherwise processed by Kapro and/or its affiliates worldwide.

BY INTERACTING WITH US (INCLUDING BY ENTERING, CONNECTING TO, ACCESSING OR USING THE SITE), YOU ACKNOWLEDGE THAT YOU ARE OR HAVE HAD THE OPPORTUNITY TO BECOME AWARE OF AND AGREE (IN ANY JURISDICTION WHERE SUCH CONSENT IS REQUIRED) TO THIS PRIVACY AND COOKIE POLICY AND KAPRO’S PRACTICES DESCRIBED THEREIN, INCLUDING THE PROCESSING (INCLUDING COLLECTING, USING, DISCLOSING, RETAINING OR DISPOSING) OF YOUR INFORMATION UNDER THE TERMS OF THIS POLICY.

3. Which information may we collect?

3.1. As part of our general business practices, we may collect Personal Information from our:

- customers;
- contractors and consultants;
- local distributors and suppliers;
- third party providers of goods or services (such as freight brokers, freight companies and manufacturers); and
- Users of our Site.

3.2 We may collect two types of data and information:

3.2.1 *Non-personal Information.* The first type is non-identifiable information collected from Users of our Site. To put it simply, we do not know the identity of the User from which we have collected the Non-personal Information. Non-personal Information, which is being gathered, consists of technical information and behavioral information that does not pertain to a specific individual. For example, technical information may include information such as the type and version of your device and its operating system, the type of browser, screen resolution, device browser and keyboard language, Wi-Fi connectivity and the type and name

of your device and/or browser, etc. Behavioral information may include aggregated data concerning Users' click-stream on the Site, the activities of the Users on the Site and additional aggregated non-identifiable information of a similar nature.

3.2.2 *Personal Information.* The other type of information we may collect is individually identifiable information. To put it simply, this information may identify an individual, such as your contact information.

3.2.2.1. Personal Information may include information that is provided voluntarily by you, including:

- *Communications with Kapro:* information you provide us as part of any communications with Kapro, including by approaches to our customer services functions or during sales calls or via use of our Site (including your names, address, email address, phone number, the name of the organization you work for, and your professional title). We may also record such calls for quality assurance purposes and in order to improve our services.
- *Contact Form:* information you provide us when filling the Contact Form available on our Site. The Contact Form may require you to provide the following details: full name, email address, phone number, state, country, and company name. A free text field may also be provided.
- *Job Applicants:* information you provide us when applying for a position via the "Careers" page available on the Site or by other means, as further detailed under Section 3.2.2.3 below.

3.2.2.2 Personal Information may include information collected via technology, including:

- *Geolocation data*: we will access, monitor, store and/or process "geolocation data" that is collected when you use the Site, including through the collection of IP addresses and other similar information to determine your location for the purpose of providing a localized version of our Site and for security purposes.
- *Technical and behavioral information*: to the extent that the non-identifiable technical and behavioral information detailed in Section 3.2.1 above will be linked to or associated with a specific individual, then that information will be considered as Personal Information.
- *Identifiers*: such as your Internet Protocol (IP) address, your Unique Device Identifier (UDID), or another unique identifiers, where such identifiers are linked to or associated with a specific individual.

3.2.2.3. Personal Information may include information relating to job applicants. If you are applying for a job with us, we may also collect your

- employment history and qualifications;
- academic records;
- references;
- medical information;
- personal contact details;
- superannuation fund details; and
- criminal history record.

You may use the "Careers" page available on our Site to apply for a position at Kapro and send us your CV, and in such case the following applies:

- As part of the submission of an application, you will be required to provide your full name, email address and phone number and attach your CV.
- The Personal Information collected as part of the application process, including any Personal Information included in your CV, may be accessed by our HR department and/or by Kapro managers, worldwide, solely for the purposes of evaluation and to enable us to contact you with respect to the recruitment process.
- If you submit an application on behalf of a third party, you hereby acknowledge that such third party was made aware of this Privacy and Cookie Policy and has granted his/her consent to the processing of his/her Personal Information by Kapro.
- Kapro will retain Personal Information collected from applicants solely for the period that is necessary for the purposes set forth under this Privacy and Cookie Policy or for the maximum statutory period in which a claim with respect to the recruitment process may be brought against Kapro.

- Personal Information may be retained for future consideration by Kapro (e.g. future positions at Kapro) solely to the extent that we receive your permission to do so.
- If you are successfully recruited to work for Kapro, any Personal Information collected as part of the application process may be retained by Kapro for the purposes of your employment.

3.3. Please note:

- We may cross-reference Personal Information collected by one means with other Personal Information we have about you and any Non-personal Information connected or linked to or associated with any Personal Information shall be deemed as Personal Information as long as such connection, linkage or association exists.
- We use third-party tracking services and usage logs, to track and analyze data from Users of the Site and for purposes of security and fraud prevention (for more information please refer to Section 11 below). We may also use cookies to gather information regarding your use of the Site and the information you have searched and accessed (for more information please refer to Section 13 below).

4. How do we collect your information?

- As described in this Privacy and Cookie Policy, we may collect Personal Information from or about you in different ways, including:
- from you directly when you voluntarily interact with us, e.g. from our discussions with you, when you complete a Contact Form, from your emails to us, and from your use of our Site; and
- through third parties with whom we interact to provide our products and services.

4.1. If you apply for a job or contract position with us, we may also collect Personal Information about you from third parties and publicly available sources, including from:

- recruiters;
- government departments to verify your entitlement to work in The United States;
- police agencies to obtain your criminal history record;
- academic institutions;
- consulting medical practitioners;
- your current or previous employers; or
- your referees.

4.2. For the Personal Information you provide to us voluntarily, we use two main methods to collect this information:

- 4.2.1. We collect information through your entry, connection, access and/or use of the Site. In other words, when you access or use the Site we are aware of your usage of the Site, we may gather, collect and record the information relating to such usage (for example, when you use the Site, we may gather your click-stream).
- 4.2.2. We collect information which you provide us voluntarily. For example, we collect Personal Information that you provide via the Contact Form on our Site or when you email us or interact with us directly as part of our business operations. We will inform you prior to collecting your Personal Information if it is requested on a voluntary basis and any consequences of not providing voluntary Personal Information.

5. What are the purposes for the collection and processing of information?

- 5.1. Non-personal Information is processed by us in order to:
 - enhance the User's experience on the Site;
 - create statistical information and learn about the preferences of Users and general trends on the Site (e.g. understand which features are more popular than others); and
 - take steps to keep the Site safe and secure and prevent fraud.
- 5.2. Personal Information is processed in order to:
 - provide our products and services, manage and conduct our business, obtain your feedback, and help us manage, develop and enhance our services, including via our Site;
 - enable the operation of the Site;
 - contact you for the purposes of offering you our products and services;
 - consider your suitability for employment and contact you for the purposes of processing your job application (having first obtained your consent and subject to your right to withdraw such consent at any time);
 - personalize your experience on the Site (e.g. geolocation data may be used to provide you with a localized version of the Site, where available);
 - present content on the Site in an optimal way for your device (e.g. tablet, mobile phone);
 - send you by email, SMS, phone, through web-browser notification or through the post, updates, notices, announcements and additional information related to Kapro including with respect to changes made to our Site's terms of use and privacy policy;
 - conduct internal operations, including troubleshooting, data analysis, testing, research and statistical purposes;
 - take steps to keep the Site safe and secure and prevent fraud;
 - comply with our legal obligations and in order to be able to protect our rights and legitimate interests, including in order to improve the Site;

- track emails – we may use tracking technology within the email we may send you in order to improve interactions with you and to better understand whether our emails have been opened and read, and such tracking may include capturing the time and date in which you opened our email messages and the type of device you use to open such emails.

5.3. Note to our Users in the EU:

In order for Kapro to process your Personal Information, as detailed herein, such processing must be justified by a "basis" for processing. Please note that the Personal Information processing activities detailed herein may be justified on the basis that:

- the processing is based on your consent – where you provide us with your consent to contact you for marketing and job application purposes or when we use cookies to collect information about your use of the Site, you will be asked to consent to such activities before we can process such information. If you choose not to give us your consent for such processing activities, or if you decide later to remove your consent, this may affect our ability to provide you with services, including services available on our Site.
- the processing is necessary for performance of a contract or in order to take steps prior to entering into a contract – usually your Personal Information will be provided to us because you are interested in engaging with Kapro for the purchase of our products and services. As such, we rely on this basis for processing activities that are required in order to enable you to use the Site and to let you know of changes to our Site's terms of use and this Privacy and Cookie Policy.
- the processing is necessary to comply with a legal obligation – we may process your Personal Information for disclosure of information to authorities; and
- the processing is in our legitimate commercial interests – subject to your interests and fundamental rights, we will process your Personal Information under this basis with respect all other Personal Information processing activities described herein, such as the processing of your Personal Information in order to personalize the Site, assisting us to prevent crime and fraud, complying with regulatory requirements, for our internal operations, maintain records and track emails. We may also use the information contained in cookies and other such files or tags for our legitimate interests.

6. **Sharing Personal Information with Third Parties**

- 6.1. Kapro respects your privacy and will not disclose, share, rent or sell your Personal Information to any third party, other than as described under this Privacy and Cookie Policy, or as permitted by law.
- 6.2. In addition to using the information collected by us for the purposes described under Section 5 above, we may also share your information in the following cases:

- *Group Companies:* the Personal Information you provide to us may be accessed by members of our group of companies in order to fulfill the purposes detailed herein;
- *Local Distributors, Dealers and Sales Representatives:* When you provide us with your contact details or make certain requests for information about Kapro products or services, we may transfer your name and contact information to a local distributor, dealer or sales representative of Kapro products and services that is located close to your location, solely in order to enable us to respond to your request. We identify a local distributor, dealer or sales representative using the location that you provided us. Please note that we instruct our local distributors, dealers and sales representatives to maintain appropriate data security safeguards in place and they are contractually restricted from using your Personal Information for any purpose other than in order to offer you Kapro's products and services, and/or in order to respond to any other specific request that Kapro has received from you. Such distributors, dealers and sales representatives may separately ask you to provide your name and contact information for other marketing or business activities. Any information that you may transfer to them directly will be used by them according to their own privacy policies and practices, and Kapro will not be responsible for their use of such information.
- *Kapro Personnel:* Personal Information that we collect and process may be transferred to or accessed by personnel of Kapro for the purposes of enabling our business operations and the operation of the Site, and to contact you (as detailed in Section 4 above). All Kapro personnel that will have access to your Personal Information are subject to obligations of confidentiality with respect to such Personal Information.
- *Service Providers:* we share Personal Information with vendors, third party suppliers, commercial software providers, our professional advisers (including lawyers, accountants and auditors), and data processors, consultants and other third parties who perform services on our behalf, including without limitation, companies that provide analysis, messaging services and hosting services. Please note that we collect, hold and manage your Personal Information through a third party's cloud based services, as reasonable for business purposes, which may be located in countries outside of your jurisdiction. For more information regarding our service providers, please refer to Section 11 below.

- In addition, we may share Personal Information in the following cases: (a) to satisfy any applicable law, regulation, legal process, subpoena or governmental request; (b) to enforce this Privacy and Cookie Policy or any other agreement or terms of service between you and Kapro, and to defend against any claims or demands asserted against us by you or on your behalf; (c) to detect, prevent, or otherwise address fraud, security or technical issues; (d) to protect the rights, property, or personal safety of Kapro, its Users, customers, third parties it interacts with in order to conduct its business, and the general public; and (e) when Kapro is undergoing any change in control, including by means of merger, acquisition or purchase of all or substantially all of the assets of Kapro (including if such acquiring or acquired company or investor may be located in countries outside of your jurisdiction).
- 6.3. For avoidance of doubt, Kapro may transfer and disclose Non-personal Information to third parties at its discretion including without limitation for statistical, analytical and research purposes and for customizing, developing, and improving our Site.

7. Direct Marketing

We may use your Personal Information for the purposes of offering you our products and services. We may, with your consent, contact you from time to time by email, SMS, phone, through web-browser notification or through the post. You can withdraw your consent to receiving direct marketing communications from us at any time by unsubscribing from the mailing list by following the instructions in the relevant message or by contacting us at info@Kapro.com

8. Your Rights

- 8.1. We will endeavor to ensure that the Personal Information collected from you is up to date, accurate and complete. Kapro acknowledges you have the right to access and change the Personal Information we collect and process. If you wish to access or to correct, amend, or delete Personal Information, please send an email to: info@Kapro.com. We will respond within a reasonable timeframe, but in any event no later than permitted by applicable law. We will need to verify your identity before responding to your request. If we decide to refuse your request, we will tell you why in writing.
- 8.2. If you still consider your issue or request has not been resolved to your satisfaction, then you have the right to make a complaint to the relevant data protection authority (for example in the place you reside or where you believe we breached your rights). We can, on request, tell you the relevant authority for the processing of your personal information.
- 8.3. Note to our Users in the EU:
- We hereby inform you of the following rights (by virtue of EU law), in respect of your Personal Information:
- *Right to access*: you may have the right to request a review of your Personal Information held by Kapro.
 - *Right to rectification*: if the Personal Information processed by Kapro is incorrect, incomplete or not processed in compliance with applicable law or this Privacy and Cookie Policy, you may have the right to have your Personal Information rectified.

- *Right to erasure*: under certain conditions, you may be entitled to require that Kapro will delete or "block" your Personal Information (e.g. if the continued processing of those data is not justified).
- *Right to Portability*: you may have the right to transfer your Personal Information between data controllers (e.g. to transfer your Personal Information to another entity).
- *Right to object to or withdraw consent*: where that lawful basis for processing your Personal Information is either "public interest" or "legitimate interests", those lawful bases are not absolute, and you may have a right to object to such processing. If the processing of your Personal Information is based on your consent, you have the right to withdraw your consent to such processing at any time.
- *The right to restrict processing*: under certain circumstances, you may have the right to object to the processing of your Personal Information due to your particular situation.
- *Right to lodge a complaint*: you have the right to lodge a complaint before the relevant data protection authority or supervisory authority.

To exercise these rights, where applicable, please contact us by sending an email to: info@Kapro.com

9. Location of Your Data

- 9.1. The information collected from you by Kapro, as detailed in this Privacy and Cookie Policy, may be transferred to, and stored at, servers which may be located in countries outside of your jurisdiction and in a country that is not considered to offer an adequate level of protection under your local laws. For example, in order to deliver our services, your Personal Information may be processed by Kapro and its suppliers, service providers or partners' staff that are located in The United States or located and operate outside your country. Such locations include Israel and Microsoft Global cloud ("One Drive").
- 9.2. Kapro is committed to protecting your Personal Information and will take appropriate steps to help ensure that your Personal Information is processed and stored securely and in accordance with applicable privacy laws, as detailed in this Privacy and Cookie Policy. Such steps include putting in place data transfer agreements or taking reasonable measures to ensure that our third-party service providers comply with Kapro's data transfer protection measures. If you are in the EU, you have a right to request further information regarding the data transfer mechanisms used by us with respect to data transfers to third countries.
- 9.3. Note to our Users in the EU:
In order to keep your Personal Information safe, we apply safeguards when transferring it outside of the EEA, which may include the following:
 - transferring your personal information to countries approved by the European Commission as having adequate data protection laws, such as Israel.
 - entering into standard contracts that have been approved by the European Commission and which provide an adequate level of high quality protection, with the recipients of your Personal Information.

- transferring your Personal Information to organizations that are Privacy Shield Scheme certified, as approved by the European Commission.

BY SUBMITTING YOUR PERSONAL INFORMATION THROUGH THE SITE, YOU ACKNOWLEDGE, AND AGREE, IN JURISDICTIONS WHERE SUCH CONSENT IS REQUIRED, TO SUCH TRANSFER, STORING AND/OR PROCESSING OF PERSONAL INFORMATION.

10. Minors

10.1. The Site is intended for Users over the age of sixteen (16). Therefore, Kapro does not intend and does not knowingly collect directly Personal Information from children under the age of sixteen (16) and does not wish to do so. We reserve the right to request proof of age at any stage so that we can verify that minors under the age of sixteen (16) are not using the Site.

10.2. California Minors

California residents under eighteen (18) years of age may have additional rights regarding the collection and sale of their personal information. Please see “Your California Privacy Rights” below for more information.

11. Third Party Service Providers and Third Party Software

11.1. While conducting our business (including providing access to the Site) we may use third party service providers, who may collect, store and/or process your information, as detailed in this Privacy and Cookie Policy.

11.2. We collect, hold, manage and/or process your Personal Information through Kapro's authorized third party vendors of certain products or services (such as hosting cloud services), including, as applicable, their affiliates, solely and limited to providing us with such services, and not for any other purpose.

11.3. Such vendors may be located in a country that does not have the same data protection laws as your jurisdiction of residence.

11.4. Such third parties service providers include without limitation the following categories of service providers:

- CRM management platforms and email marketing systems, including our service provider HubSpot, Inc., whose Privacy Policy can be found at <https://legal.hubspot.com/privacy-policy>;

11.5. Please read such third party service providers' terms of use and privacy policies to understand their privacy practices.

12. Links to Third Party Websites

Certain links provided on the Site permit Users to leave our Site and enter non-Kapro sites or services. Those linked sites and services are provided solely as a convenience to you. Those linked sites and services are not under the control of Kapro and we are not responsible for the availability of such external sites or services, and do not endorse and are not responsible or liable for any content advertising, products, services or other information on or available from such linked sites and services or any link contained in a linked site or service. Kapro reserves the right to terminate any link at any time. You further acknowledge and agree that Kapro is not responsible or liable, directly or indirectly, for any damage or loss caused or alleged to be caused by or in connection with use of or reliance on any such content, goods or services available on or through any such linked sites or resource. Most of such linked sites and services provide legal documents, including terms of use and Privacy and Cookie Policy, governing the use thereof. It is always advisable to read such documents carefully before using those sites and services, including to understand their privacy and information handling practices.

Cookies & Local Storage

- 12.1. When you access or use the Site, Kapro uses industry-standard technologies such as “Cookies,” other tracking technologies, other local files and Flash (or similar technologies) which store certain information on the browser or hard drive of your computer and/or your mobile telephone device (“Local Storage”) and which will allow us to distinguish you from other Users, enable automatic activation of certain features, and improve your User experience and other capabilities.
- 12.2. Some cookies used by the Site are created per session, do not include any information about you, and, other than your session key, are removed as your session ends (usually after 24 hours). Other cookies remain saved to your device’s hard drive and/or your mobile telephone device and enable us to recognize your device in the event of a later visit to our website (“persistent cookies”). Persistent cookies allow us to make our Site more user-friendly, effective and safe. Our Site may also contain electronic images, known as web beacons. These electronic images enable us to count Users who have visited certain pages on our Site. Web beacons are not used by us to access your Personal Information, they are simply a tool we use to analyze which web pages are viewed, in an aggregate number.
- 12.3. It is easy to prohibit the Local Storage. Most devices and browsers will allow you to erase cookies from your device’s hard drive, block acceptance of cookies, or receive a warning before a cookie is stored. However, if you block or erase cookies, your experience of the Site may be limited. Please note that unless you block the acceptance of cookies, the Site will utilize cookies upon your use of the Site (unless it is required by applicable law to provide a separate consent to use such cookies, and in which case we will use such cookies only after we receive your separate consent to such use and subject to your right to withdraw such consent at any time).

- 12.4. Cookies and other Local Storage help Kapro to personalize the Site, and to:
- track clicks, and online activity to estimate usage pattern and perform other analytics.
 - gather information about your approximate geo-location to provide localized content.
 - store information about your preferences and the device or browser you are using, and thereby customize and personalize the Site.
 - improve the Site; and
 - prevent fraud and/or abuse of our services.

13. Security

- 13.1. We take reasonable and appropriate measures to (including organizational and technological measures) to protect your Personal Information from misuse, interference and loss, as well as from unauthorized access, modification or disclosure.
- 13.2. Your Personal Information is hosted on Kapro's internal servers and in some cases on the servers of Kapro's service provider(s), in each case for which reasonable and appropriate measures are taken to provide security standards (both physical and logical) to help protect your Personal Information.
- 13.3. Some of the security measures that we employ include, without limitation: highly secure services design and implementation using industry standard encryption and architectures mechanisms; restriction of access to your Personal Information to individuals who need access to it in order to process it on Kapro's behalf; and implementation of a secured permission management and auditing system using firewall and network access filtering as well as security group mechanisms.

You should always be aware, however, that there are inherent risks in transmission of information over the Internet or other methods of electronic storage and communication. Because of these inherent risks we cannot guarantee that unauthorized access or use of your Personal Information will never occur.

- 13.4. Kapro will comply with applicable laws in the event of any breach of the security, confidentiality, or integrity of your Personal Information that is reasonably determined to pose a serious risk of harm to you or that otherwise imposes legal obligations on Kapro, and we will also inform you of such a breach if required to do so by applicable law.
- 13.5. TO THE EXTENT THAT KAPRO HAS IMPLEMENTED THE REQUIRED SECURITY MEASURES UNDER APPLICABLE LAW (AND TO THE EXTENT PERMITTED BY LAW IN THAT JURISDICTION), KAPRO SHALL NOT BE RESPONSIBLE OR LIABLE FOR ANY UNAUTHORIZED ACCESS TO, HACKING OF, OTHER SECURITY INTRUSION OF, FAILURE TO STORE, OR THE THEFT, DELETION, CORRUPTION, DESTRUCTION, DAMAGE OR LOSS OF, ANY PERSONAL INFORMATION.

14. **Data Retention**

Kapro will retain the Personal Information only for as long as is required for the purpose for which it was initially collected after which we will take reasonable steps to de-identify or destroy that information (unless we have a valid justification to retain it under applicable law, such as to resolve disputes or comply with our legal obligations). These steps may vary depending on the nature of the information, the way it was collected, and how it was stored.

15. **Changes to the Privacy and Cookie Policy**

Kapro reserves the right to change this Privacy and Cookie Policy at any time, so please re-visit this page frequently to check for any changes. In case of any material change, we will make reasonable efforts to post a clear notice on the Site or we will send you an email regarding such material changes to the email address that you may have provided us with. Such material changes will take effect seven (7) days after such notice was provided on our Site or sent to you via email, whichever is the earlier. Otherwise, all other changes to this Privacy and Cookie Policy are effective as of the stated "Last Revised" date, and your continued use of the Site on or after the Last Revised date will constitute acceptance of, and agreement to be bound by and abide by, those changes. Despite the above, in the event that this Privacy and Cookie Policy is amended to comply with any legal requirements, the amendments may take effect immediately or as otherwise required by the law and without any prior notice.

16. **Your California Privacy Rights**

The following additional privacy notices for California residents (the "**California Notice**") supplement the information contained in the other portions of this Privacy and Cookie Policy and apply solely to individuals who reside in the State of California ("**California consumer**" or "**you**"). Kapro adopts this California Notice to comply with the California Consumer Privacy Act and its related regulations (the "**CCPA**") and other applicable California laws.

Overview of Consumer Rights Under the CCPA

Under the CCPA, California consumers have certain rights regarding their personal information, including:

- The right to know the categories of personal information that Kapro has collected and the categories of sources from which we obtained such information.
- The right to know Kapro's business purposes for sharing personal information.
- The right to know the categories of third parties with whom Kapro shared personal information.
- The right to access the specific pieces of personal information that Kapro has collected and the right to delete your personal information.
- The right to not be discriminated against if a California consumer exercise their rights under the CCPA.

The provisions below of this California Notice provide further details about these rights and how you may exercise them.

Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California consumer, household or device (collectively, "personal information"). Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated California consumer information.
- Information excluded from the CCPA's scope, including:
- Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; and
- Personal information covered by certain other laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

We have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples
Identifiers	An individual's 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
Personal information categories described in 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
Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
Internet or other similar network activity	Browsing history, search history, information on a California consumer's interaction with our website, application, or advertisement and any social media sites from which user information is linked, connected or obtained.
Inferences drawn from other personal information	Examples include a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes

Sources of Personal Information

In addition to sources of personal information addressed elsewhere in this Privacy and Cookie Policy, we obtain the categories of personal information listed above from the following categories of sources:

- **Directly From You.** For example, from forms you complete or products and services you purchase or from communications with you such as when you contact Kapro (whether in person, by mail, by phone, online, via electronic communication or by other means) including our customer support service.
- **Indirectly From You.** For example, from observing your actions on our Site or from products or services that you have purchased from Kapro, if you have enabled such functionality, such as telemetry services.

- **From Others.**
 - From third party service providers. For example, if you choose to make an electronic payment directly to Kapro, or through a linked website or mobile application, or through an affiliate of ours, Kapro may receive personal information about you from third parties such as payment services providers, for the purposes of that payment.
 - From affiliates. We may collect personal information about you from our affiliates or others acting on their behalf.
- **From Public Sources.** For example, we may collect information from public records.

Uses of Personal Information

In addition to uses of personal information addressed elsewhere in this Privacy and Cookie Policy, we may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill the reason that you provided the information. For example, if you share your name and contact information to request a price quote, request to be contacted by an affiliate, or ask a question about our products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a product or service, we may use that information to process your payment and facilitate delivery. We may also save your information to facilitate new product or service orders or to process returns.
- To perform services such as customer service, order fulfillment, payment processing, financing, and advertising, marketing or analytic services.
- To advance our commercial or economic interests, such as by helping you to buy, rent, lease, join, subscribe to, provide, or exchange products, information, or services, or enabling or effecting, directly or indirectly, a commercial transaction.
- To verify or maintain quality or safety standards or improve or upgrade a product or service provided or controlled by or for us.
- To provide, support, personalize and develop our Site, products and services such as to perform warranty related services or other post-sale activities such as product or service monitoring or repairs.
- To create, maintain, customize and secure your account with us.
- To process your requests, purchases, transactions and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your Site experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Site, third-party sites and via mail, email or text message (with your consent, where required by law).

- To help maintain the safety, security and integrity of our Site, products and services, databases and other assets and business.
- For testing, research, and analysis purposes, including to develop and improve our Site, products, and services.
- To respond to law enforcement requests and as required by applicable law, court order or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA or applicable law.
- To send you information relevant to your past purchases and interests, subject to compliance with applicable laws regarding direct marketing.
- To otherwise use as reasonably necessary and proportionate to achieve our operational or notified purpose for collecting personal information and as compatible with the context in which we collected the information.
- To perform services on behalf of a CCPA-covered business or its service provider, such as customer service, order fulfillment, payment processing, financing and advertising, marketing, or analytic services.
- To review and audit our business interactions with you.
- To detect or prevent security incidents or other illegal activity.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of a bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our Site users, including California consumers, is among the assets transferred.

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.

Sharing Personal Information

We may disclose your personal information to a third party for business purposes. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, Kapro has disclosed the following categories of personal information for a business purpose:

- Identifiers
- Personal information categories described in Cal. Civ. Code § 1798.80(e)
- Commercial information
- Internet or other similar network activity

- Inferences drawn from other personal information.

The categories of third parties to which we may disclose personal information collected by us include the following:

- Service providers
- Affiliates
- Recipients of data from cookies

Sales of Personal Information

Kapro does not sell personal information to third parties.

Exercising Your CCPA Rights and Choices

The sections below describe how you may exercise your rights under the CCPA.

Access to Specific Information and Data Portability Rights. 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 twelve (12) months. Once we receive and confirm your verifiable consumer request (see “Exercising Access, Data Portability and Deletion Rights” below), we will disclose to you:

- 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 is for collecting personal information.
- The categories of third parties with whom we share that personal information
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we disclosed your personal information for a business purpose, a list Disclosing.
- The personal information categories that each category of recipient obtained.

As allowed by the CCPA, we do not provide these access and data portability rights (i) for business-to-business personal information or (ii), if applicable, as to personal information collected from Kapro’s California-based employees, job applicants or contractors when provided or collected in such employee, job applicant or contractor capacities.

Deletion Request Rights. 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 (see “Exercising Access, Data Portability and Deletion Rights” below), we will delete (and direct our service providers to delete) your personal information from our (and service provider) records, unless an exception 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 or services to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another California 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 California consumer expectations based on your relationship with us, such as future field campaigns or product safety issues.
- 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.

As allowed by the CCPA, we do not provide these deletion rights (i) for business-to-business personal information or (ii) if applicable, as to personal information collected from Kapro's California-based employees, job applicants or contractors when provided or collected in such employee, job applicant or contractor capacities.

Exercising Access, Data Portability and Deletion Rights. To exercise the access, data portability and deletion rights described above, you should submit a verifiable consumer request to us by one of the following methods:

- Emailing us at info@Kapro.com
By postal mail at: Kapro Tools Inc., 251 Enterprise Dr, Lake Mills, WI 53551, United States, accessing your online account that you maintain with us.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of a minor child for whom you are a parent or legal guardian.

You may only make a verifiable consumer request for access or data portability twice within a twelve (12) month period. The verifiable consumer request must provide sufficient information that allows us to reasonably verify that you are the person about whom we collected personal information or an authorized representative, which may include:

- Your name
- Your address
- Additional information depending upon the type of request and the sensitivity of the information involved with such request.
- Describe your request with sufficient detail to enable us to properly understand, evaluate and respond to such request.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or your authority to make the request and confirm that the personal information involved with the request relates to you.

Making a verifiable consumer request does not require you to create an account with us. However, we will consider requests made through a password-protected online account that you maintain with us to be sufficiently verified when the request relates to personal information associated with that online account, provided such online account functionality is then made available by us on the Site.

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 and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time, we will inform you of the reason and extension period in writing.

If you have an online account with us, we may deliver our written response to that online account, provided that such online account functionality is then made available by us on the Site. If you do not have an online account with us, or such functionality is not available for your online account we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the twelve (12) month period immediately 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 usable 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.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA or other applicable law, we will not as a result of you exercising any of your rights under the CCPA:

- 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; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

Other California Privacy-Related Disclosures

Sharing Personal Information for Direct Marketing Purposes. Before sharing personal information of California consumers with third parties for direct marketing purposes we will obtain opt-in consent from the applicable California consumers or provide such California consumers with a cost-free method to opt out.

California Do-Not-Track Disclosure. At this time, the Site is not set up to honor web browser do-not-track settings. Do-not-track is a privacy preference that users can set in their web browsers. When a user activates the do-not-track settings in browsers that offer this setting, the browser sends a message to websites or applications requesting them not to track the user. For more information about do-not-track matters, please visit www.allaboutdnt.org.

Information on Marketing Disclosures. California Civil Code Section 1798.83 permits our users who are California residents to request and obtain from us once a year, free of charge, information about the personal information (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year. If applicable, this information would include a list of the categories of personal information that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us at: info@Kapro.com or Kapro Tools Inc., 251 Enterprise Dr, Lake Mills, WI 53551, United States.

Content Removal Requests for Site Users Under 18 Years Old. If you are a Site user under 18 years of age and reside in California, you may request and obtain removal of, content or information that you have posted on the Site. You may send us any such requests by one of the following methods: (i) by email (writing "Privacy Policy/Removal Request" in the subject line) at info@Kapro.com; or (ii) by writing to us at Kapro U.S.A. Inc., 120-J Talbert Road, Mooresville, NC 28117, USA. We will review the request and respond promptly. You should be aware that a request to remove content or information posted by you on the Site does not ensure or require complete or comprehensive removal of such content or information from our databases.

Complaints

If you have any complaint about use of the Site, you may contact us by email at info@Kapro.com, or by postal mail at Kapro Industries Ltd. Kadarim 2011700, Israel. In accordance with California Civil Code Section 1789.3, California residents may also file complaints with the Complaint Assistance Unit, Division of Consumer Services, California Department of Consumer Affairs by postal mail at 1625 North Market Road, Suite N112, Sacramento, CA 95834 or by telephone at 800-952-5210.

Changes to Our California Notice

We reserve the right to amend this California Notice at our discretion and at any time. When we make changes to this California Notice, we will post the updated California Notice on the Site and update the California Notice's effective date. Your continued use of our Site following the posting of changes constitutes your acceptance of such changes.

17. Have any Questions?

If you have any questions (or comments) concerning this Privacy and Cookie Policy, please send us an email at the following address: info@Kapro.com and we will make an effort to reply within a reasonable timeframe.