

## Privacy Policy

We respect your privacy and are committed to protecting your personal data. This privacy policy will inform you about how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a PDF version of the policy [here](#). Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

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### 1. Important information and who we are

#### Purpose of this privacy policy

This privacy policy aims to give you information on how we collect and process your personal data through your use of this website (unless a different policy is provided on a particular site or application, in which case that different policy shall have precedence).

This website is not intended for use by children, and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing your personal data so that you are fully aware of how and why we will be using your data. This privacy policy is a supplement to other notices and privacy policies and is not intended to override them.

#### Controller

ZAH Group, Inc. and its subsidiaries (collectively, “ZAH Group”, “we” or “us”), including Klein Tools, Inc., are committed to protecting your privacy and ensuring the highest level of security for your personal data.

#### Contact details

If you have any questions about this privacy policy or our privacy practices, please email us at [privacy@kleintools.com](mailto:privacy@kleintools.com).

#### Changes to the privacy policy and your duty to inform us of changes

We regularly review our privacy policy. This version was last updated as of 25 May 2018. Previous versions can be obtained by contacting our DPO.

## Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy on every website you visit.

## 2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the person's identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you, which we have categorised as follows:

- **Technical Data** includes your 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 have used to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.

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

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## If you fail to provide personal data

In cases 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 such cases, we may have to cancel a product or service you have with us, but we will notify you at the time when this occurs.

## 3. How we collect your data

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

- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites that are employing our cookies.

- **Third parties or publicly available sources.** We will receive personal data about you from analytics providers such as Google, which is based in the United States.

#### 4. How we use your personal data

We will only use your personal data when we have a lawful basis to do so. Most commonly, we will use your personal data in the following circumstances:

- 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 obligation.

Generally, we do not rely on consent as a lawful basis for the processing of your personal data, although we will obtain your consent before sending third party direct marketing communications to you via email or text messages. You have the right to withdraw your consent to the receipt of marketing materials at any time by contacting us.

#### Purposes for which we will use your personal data

The table below describes all the ways we plan to use your personal data, and 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, when more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for the processing, including the basis of a legitimate interest</b>
To manage our relationship with you, which may include asking you to leave a review or take a survey.	Profile	Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and data hosting)	Technical	Necessary for our legitimate interests (for running our business, as well as for the provision of administration and IT services, network security, preventing fraud and in the context of a business reorganisation or group restructuring)  Necessary to comply with a legal obligation
To deliver relevant website content and measure or understand the effectiveness of our website content	Usage  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.	Technical 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)
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**Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or may not function properly.

**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 receive an explanation about 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 your personal data with the parties set out below for the purposes set out in [the table above](#).

- Internal Third Parties, as defined in the [Glossary](#).
- External Third Parties, as defined in the [Glossary](#).
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as is set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes, and only permit them to process your personal data for specified purposes and in accordance with our instructions.

**6. International transfers**

We share your personal data within the ZAH Group, which means your personal information may be stored and processed outside of your home country, including in countries that may not offer the same level of protection for your personal information as your home country. In addition, the external third parties that may store and process your personal information are based in countries around the world, including in countries that may not offer the same level of protection for your personal information as your home country.

When we transfer personal information internationally, we put in place safeguards on that information in accordance with the applicable law (including Articles 44 to 50 of the EU General Data Protection Regulation).

If you would like to know more about our data transfer practices and obtain copies of any relevant safeguarding measures, please contact our Privacy Team.

## 7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to employees, agents, contractors and other third parties who need to know for business purposes. They will only process your personal data according to our instructions and they are subject to the duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach, and we will notify you and any applicable regulators of a breach where we are legally required to do so.

## 8. Data retention

### How long will you use my personal data for?

We will only retain your personal data for as long as is reasonably necessary to fulfil the purposes that we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint, or if we reasonably believe there is a prospect of litigation with respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from the unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Details of the retention periods for different aspects of your personal data are available in our retention policy, which you can request from us by contacting our Privacy Team.

In some circumstances you can ask us to delete your data; see [Your legal rights](#) below for further information.

In some circumstances, we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without providing further notice to you.

## 9. Your legal rights

You may have the right under European and other laws to access your personal information, and to ask us to rectify, erase and restrict the use of your personal information. You may also have the right to object to your personal information being used, to ask for a transfer of the personal information you have made available to us and to withdraw consent to the use of your personal information. Further information on how to exercise your rights is set out below.

We will honour your rights under the applicable data protection laws. You have the following rights under European laws, and you may have similar rights under the laws of other countries.

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

- **Request the correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, although we may need to verify the accuracy of the new data you provide to us.
- **Request the erasure** of your personal data. This enables you to ask us to delete or remove personal data when there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data when you have successfully exercised your right to object to its processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local laws. Note, however, that we may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to the processing** of your personal data when we are relying on a legitimate interest (or those of a third party), and there is something about your particular situation which makes you want to object to the processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object when we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request a restriction of the processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - You want us to establish the data's accuracy.
  - Our use of the data is unlawful, but you do not want us to erase it.
  - You need us to hold the data even if we no longer require it, as you need it to establish, exercise or defend a legal claim.
  - You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or to a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to the automated information which you initially provided consent for us to use, or where we have used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time when you withdraw your consent.

### **No fee is usually required**

You will not have to pay a fee to access your personal data (or to exercise any of your other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

## What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that the personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request, in order to speed up our response.

## Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally, it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 10. Glossary

### LAWFUL BASIS

Some laws require us to explain our lawful reason for processing your personal information. We process the personal information about you on the basis that it is:

- necessary for the performance of a contract: in cases where we have a contract with you, we will process your personal information in order to fulfill that contract (e.g. to provide you with goods or services)
- in our or a third party's legitimate interests: details of those legitimate interests are set out in more detail below (e.g. the provision of goods or services that we are contractually obliged by a third party to deliver to you)
- where you give us your consent: we only ask for your consent in relation to specific uses of your personal information when we need to and, if we need it, we will collect it separately and make it clear that we are asking for your consent
- for compliance with a legal obligation (e.g. to respond to a court order or a regulator)

**Legitimate interest** means the interest of our business in conducting and managing our business, to enable us to give you the best service/product and the best and most secure experience. We make sure to consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent, or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you with respect to specific activities by contacting us.

**Performance of a contract** means the processing of your data in a case where it is necessary for the performance of a contract to which you are a party, or to take steps at your request before entering into such a contract.

**Comply with a legal obligation** means the processing of your personal data in a case where it is necessary for compliance with a legal obligation that we are subject to.

## **THIRD PARTIES**

### **Internal Third Parties**

ZAH Group, Inc. and its subsidiaries, which are based in the United States, Australia, Brazil, Hong Kong, Mexico, Panama and the United Kingdom, acting as joint controllers or processors.

### **External Third Parties**

Other companies, agents or contractors used by the ZAH Group to perform services on our behalf, or to assist us with the provision of the Company's services and products to you. Your personal data may be shared with the following categories of service providers, acting as processors or joint controllers of your personal data:

- infrastructure and IT service providers, including cloud service providers;
- marketing, advertising and communications agencies;
- online payment and fraud prevention service providers;
- delivery/logistics service providers (for the delivery of products bought online);
- external auditors and advisers (e.g. social media consultation providers);
- providers of services related to some enhanced online features such as customer reviews;
- cookie analytics providers;
- online advertisers; and
- providers of website testing/analytics services.

In addition, external third parties include legal or regulatory authorities, acting as processors or joint controllers, who may require the reporting of processing activities in certain circumstances.