

## PRIVACY POLICY

**Last Modified: May 24, 2018**

**1. INTRODUCTION.** The Sloan Company, Inc., a California corporation (dba SloanLED) (“us,” “we,” or “Company”) is committed to respecting the privacy rights of its customers, visitors, and other users of the Company’s websites (sloanled.com and litecorr.com, or collectively, the “Site”). By using the Site, you are accepting the practices described in this Privacy Policy. These practices may be changed, but any changes will be posted and changes will only apply to activities and information on a going forward, not retroactive basis. You are encouraged to review the Privacy Policy whenever you visit the Site to make sure that you understand how any personal information you provide will be used. This Privacy Policy explains what information of yours will be collected by us when you access the Site, how the information will be used, and how you can control the collection, correction and/or deletion of information. We will not use or share your information with anyone except as described in this Privacy Policy. This Privacy Policy is only applicable to the Site, and not to any other websites that you may be able to access from the Site, each of which may have data collection, storage, and use practices and policies that differ materially from this Privacy Policy.

## **2. INFORMATION COLLECTION PRACTICES**

### **2.1. TYPES OF INFORMATION COLLECTED**

**(a) TRAFFIC DATA COLLECTED.** We automatically track and collect the following categories of information when you visit our Site: (1) IP addresses; (2) domain servers; (3) types of computers accessing the Site; and (4) types of web browsers used to access the Site (collectively “Traffic Data”). Traffic Data is anonymous information that does not personally identify you but is helpful for marketing purposes or for improving your experience on the Site.

We may also use “cookies” to customize content specific to your interests, to ensure that you do not see the same advertisement repeatedly, and to store entered information so you do not have to re-enter it each time you visit the Site. Cookies may also be used in analyzing trends, administering the Site, tracking your movements around the Site and to gather demographic information about our user base as a whole. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use the Site, but your ability to use some features or areas of our Sites may be limited.

We may use Google Analytics to measure and evaluate access to and traffic on the Site, and create user navigation reports for our Site administrators. Google operates independently from us and has its own privacy policy, which we strongly suggest you review. Google may use the information collected through Google Analytics to evaluate users' activity on our Site. We take measures to protect the technical information collected by our use of Google Analytics. The data collected will only be used on a need to know basis to resolve technical issues, administer the Site and identify visitor preferences; but in this case, the data will be in non-identifiable form. To learn more about the privacy policy of Google Analytics, visit [www.google.com/analytics](http://www.google.com/analytics), and to learn how to opt out of that service, visit [tools.google.com/dlpage/gaoptout](http://tools.google.com/dlpage/gaoptout).

**(b) PERSONAL INFORMATION COLLECTED.** In order for you to access certain services that we offer via the Site, we require you to provide us with certain information that personally identifies you ("Personal Information"). Personal Information includes your name, mailing address, telephone number, and e-mail address. If you communicate with us by e-mail or otherwise complete online forms, any information provided in such communication may be collected as Personal Information.

**(c) INFORMATION FROM OTHER SOURCES.** We may obtain information, including Personal Information, from third parties and sources other than the Site, including information entered by you at [sloanled.ledwizard.com](http://sloanled.ledwizard.com). This Privacy Policy is only applicable to the Site, and not to any other websites from which we may obtain information, each of which may have data collection, storage, and use practices and policies that differ materially from this Privacy Policy. However, if we combine or associate information from other sources with Personal Information that we collect through the Service, we will treat the combined information as Personal Information in accordance with this Privacy Policy.

**(d) RETENTION.** We will retain Personal Information we process on behalf of users for as long as, but no longer than necessary to (i) provide the services offered through the Site and (ii) comply with our legal obligations, resolve disputes and enforce our agreements.

## 2.2. USES OF INFORMATION COLLECTED

**(a) COMPANY USE OF INFORMATION.** We use Personal Information to send you product specifications, marketing materials, and similar information about our company or our products or services, or to contact you when necessary. For purposes of the European Union's General Data Protection Regulation (Regulation (EU) 2016/679 ("GDPR")), the legal basis for our processing of Personal Information is that the processing is necessary for providing our services or information about our services through the Site and that the processing is carried out in our

legitimate interests (see GDPR Article 6(1)(f)), which legitimate interests are as set forth in this Section 2.2(a) and elsewhere in this Privacy Policy.

**(b) SHARING OF PERSONAL INFORMATION.** We will not rent or sell your Personal Information to others except as described in this Privacy Policy. We may share Personal Information with manufacturing representatives, distributors, and similar partners for marketing or similar purposes. We may store Personal Information in locations outside our direct control (for instance, on servers or databases co-located with hosting providers). We work with third party service providers who provide website, hosting, maintenance, and other services for us. These third parties may have access to, or process Personal Information as part of providing those services for us. We limit the information provided to these service providers to that which is reasonably necessary for them to perform their functions, and our contracts with them require them to maintain the confidentiality of such information.

**(c) USER CHOICE REGARDING COLLECTION, USE, AND DISTRIBUTION OF PERSONAL INFORMATION.** You may choose not to provide us with any Personal Information. In such an event, you can still access and use much of the Site; however you will not be able to access and use those portions of the Site or related services that require your Personal Information. If at any time you no longer wish to receive information and promotional material from us or from some of our partners, you may select the appropriate “opt-out” option in the applicable e-mail communication as described in paragraph (f) below.

**(d) SHARING OF NON-PERSONAL INFORMATION.** We may share non-personally identifiable information (such as anonymous usage data, referring/exit pages and URLs, platform types, number of clicks, etc.) with interested third parties to help them understand the usage patterns of the Site. Non-personally identifiable information may be stored indefinitely.

**(e) TESTIMONIALS.** We may display personal testimonials of satisfied customers on our Site in addition to other endorsements. With your consent, we may post your testimonial along with your name. If you wish to update or delete your testimonial, you can contact us at [info@SloanLED.com](mailto:info@SloanLED.com).

**(f) OPTING OUT FROM COMMERCIAL COMMUNICATIONS.** If you receive our newsletter or other commercial emails from us, you may unsubscribe at any time by following the instructions contained within the email or by sending an email to [info@SloanLED.com](mailto:info@SloanLED.com).

### 3. CONFIDENTIALITY AND SECURITY OF PERSONAL INFORMATION.

**3.1 CONFIDENTIALITY.** Except as otherwise provided in this Privacy Policy, we will keep your Personal Information private and will not share it with third parties. We may disclose Personal Information or other information if required to do so by law or in the good-faith belief that such action is necessary to comply with applicable laws, in response to a facially valid court order, judicial or other government subpoena or warrant, or to otherwise cooperate with law enforcement or other governmental agencies. We also reserve the right to disclose Personal Information or other information that we believe, in good faith, is appropriate or necessary to (i) take precautions against liability, (ii) protect ourselves or others from fraudulent, abusive, or unlawful uses or activity, (iii) investigate and defend ourselves against any third-party claims or allegations, (iv) protect the security or integrity of the Site and any facilities or equipment used to make the Site available, or (v) protect our property or other legal rights, enforce our contracts, or protect the rights, property, or safety of others.

**3.2 SECURITY.** We follow generally accepted industry standards to protect the information submitted to us, both during transmission and once we receive it. We maintain appropriate administrative, technical and physical safeguards to protect Personal Information against accidental or unlawful destruction, accidental loss, unauthorized alteration, unauthorized disclosure or access, misuse, and any other unlawful form of processing of the Personal Information in our possession. This includes, for example, firewalls, password protection and other access and authentication controls, and encryption of data during transmission through public internet. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. We cannot ensure or warrant the security of any information you transmit to us or store on the Site, and you do so at your own risk. We also cannot guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. If you have any questions about security on our Site, you can contact us at [info@SloanLED.com](mailto:info@SloanLED.com).

**3.3 COMPROMISE OF PERSONAL INFORMATION.** In the event that Personal Information is compromised as a breach of security, we will promptly notify you and the authorities in compliance with applicable law. If you believe your Personal Information has been compromised, you can contact us at [info@SloanLED.com](mailto:info@SloanLED.com).

**3.4. USER ABILITY TO ACCESS, UPDATE, AND CORRECT PERSONAL INFORMATION.** We maintain a procedure in order to help you confirm that your Personal Information is correct. An individual who seeks access or wishes to correct, amend or delete inaccurate information should direct his or query to [info@SloanLED.com](mailto:info@SloanLED.com). If we receive a request under this provision, we will acknowledge it within seventy-two (72) business hours and handle it promptly. Data

protection law gives you a range of rights in connection with our processing of your Personal Information. In this regard, you have the right to request that we rectify or delete the Personal Information or restrict the processing of your Personal Information, if you think they are inaccurate. Furthermore, you have the right to object to the processing based on our legitimate interests as a legal basis. We are required to assess and act on your request. You have a right to lodge a complaint with your local supervisory authority. If you have any questions about this Privacy Policy or your rights under data protection law, direct your questions to [info@SloanLED.com](mailto:info@SloanLED.com).

**3.5. CHANGES OF OWNERSHIP.** Information about Site users, including Personal Information, may be disclosed and otherwise transferred to an acquirer, successor or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets and only if the recipient of the Personal Information commits to a Privacy Policy that has terms substantially consistent with this Privacy Policy.

Personal Information may be physically or electronically transferred to an acquirer, or successor or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets, for the sole purpose of continuing the operation of the Site and our business, and only if the recipient of the Personal Information commits to a Privacy Policy that has terms substantially consistent with this Privacy Policy.

**3.6. OTHER WEBSITES.** The Site contains links to other websites. We are not responsible for the privacy practices or the content of such websites.

**3.7 CHILDREN'S PRIVACY.** Protecting the privacy of young children is especially important. For that reason, we do not knowingly collect or solicit personal information from anyone under the age of 18. In the event that we learn that we have collected personal information from a child under age 18, we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under 18, please contact us at [info@SloanLED.com](mailto:info@SloanLED.com).

**4. UPDATES AND CHANGES TO PRIVACY POLICY.** We reserve the right, at any time and without notice, to add to, change, update, or modify this Privacy Policy, simply by posting such change, update, or modification prominently on the Site and without any other notice to you. Any such change, update, or modification will be effective immediately upon posting on the Site.

**5. STORAGE AND PROCESSING.** Your information collected through the Site may be stored and processed in the United States, Europe, or any other country in which we or our subsidiaries, affiliates or service providers maintain facilities. These countries may not have the same data protection framework as the country from which you may be using the Site. When we transfer Personal Information to these countries, we will protect it as described in this Privacy Policy. Where applicable, we will comply with GDPR requirements providing adequate protection for the transfer of personal information from the European Economic Area to the United States or other countries.

**6. YOUR CALIFORNIA PRIVACY RIGHTS.** Under California's "Shine the Light" law, California residents who provide personal information in obtaining products or services for personal, family, or household use are entitled to request and obtain from us, once each calendar year, information about the customer information we shared, if any, with other businesses for their own direct marketing uses. If applicable, this information would include the categories of customer information and the names and addresses of those businesses with which we shared customer information for the immediately preceding calendar year. To obtain this information, please send an e-mail message to [info@SloanLED.com](mailto:info@SloanLED.com) with "Request for California Privacy Information" in the subject line and in the body of your message. We will provide in response the requested information to you at your e-mail address. Please be aware that not all information sharing is covered by the "Shine the Light" requirements and only required information will be included in our response. California law also requires that operators of websites and online services disclose how they respond to a Do Not Track signal. Some browsers have incorporated "Do Not Track" features. Most of these features, when turned on, send a signal or preference to the website or online service that a user visits, indicating that the user does not wish to be tracked. Because there is not yet a common understanding of how to interpret Do Not Track signals, we do not currently respond to a Do Not Track signal.

**7. HOW TO CONTACT US.** If you have any questions about this Privacy Policy, the practices of the Site, or your dealings with the Site, please contact us at [info@SloanLED.com](mailto:info@SloanLED.com), or to:

5725 Olivas Park Drive  
Ventura, CA 93003  
United States  
Toll-free: +1 888 747 4533  
Worldwide: +1 805 676 3200  
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Our representative in the European Union is Martin Andersen, Director of International Sales. The representative may be contacted at [europe@SloanLED.com](mailto:europe@SloanLED.com), or by sending mail to:

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