

## PRIVACY POLICY

For the purpose of this Privacy Policy, The Water-Right Group is defined and includes all branded websites and products manufactured and sold by Water-Right. These brands include, but are not limited to, Water-Right, Evolve, WaterCare and Custom Care.

This Privacy Notice ("Privacy Policy") explains how we handle the Personal Data provided to us on websites, on mobile sites, on mobile applications, over the phone, by email, and on other digital services and products controlled by Water-Right Inc., 1900 Prospect Ct Appleton WI, that link to this Privacy Policy (collectively, "Water-Right Sites"). Water-Right is the data controller for the processing of Personal Data under applicable law.

This Privacy Notice does not apply to Water-Right Sites that do not link to this Privacy Policy or to third-party Web sites to which Water-Right Sites may link. If you use Water-Right's Wripli product or services please see separate privacy policy located on the Wripli Web Site and or Application.

### Types of Information We Collect Online

The types of Personal Data that we may collect while you use the Water-Right Sites are described in this section and include both information that you provide to us and information that we collect automatically when you use the Water-Right Sites.

For purposes of this Privacy Notice, "Personal Data" means information that identifies you or that could reasonably be used to identify you. Examples of Personal Data include name, address, telephone number, email address, IP address, and/or any other identifier that permits the physical or online contacting of a specific individual.

### Information You Provide

You do not have to register for a service or program to receive much of the information available through Water-Right Sites. However, some of our content is available only to registered or identified users and will require you to set up a profile or provide specific information about yourself in order to provide you the service.

We will not ask for, and we ask that you not send us and you not disclose any sensitive personal information (e.g., social security numbers, or information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or membership with any organization) on or through the services or otherwise to us.

### Personal Data You Provide When Visiting Water-Right Sites

Water-Right collects Personal Data that you provide on Water-Right Sites, for example, to receive marketing products and information, contact Water-Right customer service, or respond to Water-Right questionnaires or surveys. This could include:

- Contact Information such as your name, address, phone number, or email address.
- Registration Information such as your username and password.
- Employment, education and other background information when you inquire about employment with Water-Right.
- Content you may provide (for example, when you complete our Online Contact Form or submit other information).
- When searching for a dealer, we may capture and aggregate information about zip codes searched, to help us better understand the geographical demand for our products and services.

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### **Personal Information You Share During Other Interactions with Water-Right**

You may contact Water-Right to ask questions, discuss your concerns, or report issues regarding our products. If you communicate with or request information from Water-Right, you may be prompted to provide your contact information as well as any Personal Data that is relevant to your request.

### **Information That May Be Collected Automatically**

When you use the Water-Right Sites, we also may collect certain usage and device information automatically as described below.

#### *IP Address*

We may record the Internet Protocol (“IP”) address of your computer or other electronic device when you visit the Water-Right Sites. An IP address identifies the electronic device you use to access the Sites, which allows us to maintain communication with your computer as you move about Water-Right Sites and to customize content.

#### *Cookies and Other Tracking Technologies*

We also collect information about your use of Water-Right Sites through tracking technologies such as cookies. A “cookie” is a unique numeric code that is transferred to your computer to track your interests and preferences and to recognize you as a return visitor. Cookies help remember your preferences and allow us to bring you the content and features that are likely to be of greatest interest to you on the basis of “clickstream” data that shows your previous activities on Water-Right Sites.

We utilize digital marketing tools such as display ads and retargeting ads through Google AdWords, Google Analytics, DoubleClick Campaign Manager integration, and Google Analytics Demographics and Interest Reporting) to:

- (1) show you our ads on other websites based on your prior visits to Water-Right Sites;
- (2) better understand our ad impressions and use of ad services; and
- (3) use website visitor data to target our interest-based advertising and to understand and improve our marketing campaigns, website content and user experience.

Some of our online advertising takes place through Google AdWords. As part of this program, we may use a variety of ad features such as retargeting. In connection with that feature we and the operators of ad networks, including Google, may use third-party cookies (such as the DoubleClick cookie) – and in some cases first-party cookies (such as the Google Analytics cookie) – to inform, optimize and serve ads across the internet, based on a user’s past visits to Water-Right websites. We also may show you ads from some of our affiliated companies when you visit Water-Right websites.

You can opt out of Google AdWords by visiting <http://www.google.com/ads/preferences>. If you do not want your data used by Google Analytics, you can install the Google Analytics opt-out browser add-on at the Google Analytics opt-out page.

This Water-Right Site is not designed to respond to “do not track” signals received from browsers.

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### ***Embedded content from other websites***

Pages on this site may include embedded content (e.g. videos, images, articles, maps, JavaScript Libraries, Web Fonts, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including such things as tracing your interaction with the embedded content, tracking what pages you viewed that embedded content on, or associating your visited pages with your account on that website if you have an account and are logged in to that website.

To learn more about cookies and other tracking technologies, including how to disable them, please visit <http://www.allaboutcookies.org/>. Please note that some cookies are essential to the functioning of our Sites and deleting or disabling them will reduce the site's functionality.

### ***Mobile Tracking***

Some Water-Right Sites are available either as mobile applications or mobile sites that you can use on your mobile device. If you use a mobile device to access and use the Water-Right Sites, we may collect the following mobile-specific information in addition to the other information described above: device or advertising ID, device type, hardware type, media access control ("MAC") address, international mobile equipment identity ("IMEI"), the version of your mobile operating system, the platform used to access or download the Water-Right Site (e.g., Apple, Google, Windows), location information and usage information about your device and your use of the Water-Right Sites.

### ***Information Collected from Other Sources***

We may combine information about you from a visit to a Water-Right Site with information about you from visits to other Water-Right Sites. We may also combine information about you that is collected through the Water-Right Sites with information that we have collected offline, as well as with information provided to us by third parties.

## **How We Use Your Information**

We use your Personal Data to provide you the product and services you request, communicate with you, improve your experience on the Water-Right Sites, generally improve our products and services and for other internal business purposes. These uses may also include the recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of Personal Data. The Personal Data we collect about you may be stored only for so long as reasonably necessary for the purposes set out above, in accordance with applicable laws.

### ***Providing Product and Services You Request***

If you choose to purchase a product or receive our services, we use the Personal Data that you provide through a Water-Right Site to manage your orders, to respond to your questions, provide you the services you request and offer an optimal customer experience.

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### ***Marketing***

You may also receive marketing information from Water-Right and related affiliates, such as offers regarding Water-Right's related products or services, invitations to participate in surveys about our products, or notifications about special promotions. In such cases, we will use your contact and other Personal Data such as e-mail address(es) to send you marketing information.

### ***Customized User Experiences***

The Personal Data that you provide may be used to create customized offers, information, or services tailored to your interests and preferences. Also, we may use your IP address and the data that we obtain automatically through the use of cookies or similar tracking technologies to make our Water-Right Sites easier to use and navigate as well as to personalize the content provided on Water-Right Sites by anticipating the information and services that may be of interest to you.

### ***Business and Product Improvement***

In order to discover new facts that could help Water-Right better understand customer needs and help improve, develop, and evaluate product, services, materials, and programs. Water-Right analyzes the information that you have provided. For these purposes Water-Right does not use information that can directly identify you.

### ***Site Analytics and Improvement***

We may use the information that you provide and the information we collect automatically about your use of the Water-Right Sites to monitor user traffic patterns and preferences for site improvement, analytics and optimization.

## **Legal Basis for Processing**

Water-Right must have a legal basis to process your Personal Data. The legal basis that applies in an instance will depend on for which of the specific purposes described above Water-Right name is processing your Personal Data: In certain cases, Water-Right name may ask for your consent to collect and process your Personal Data. Should you choose to provide your consent, you may later withdraw your consent by contacting us as described in the "Your Privacy Choices" section. Withdrawal of consent will not affect processing which has already occurred.

In other instances, the processing of your Personal Data may be necessary in order to comply with an applicable law or regulation or for the performance of a contract to which you are subject. You may not be able to opt-out of this processing, or your choice to opt-out may impact our ability to perform a contractual obligation otherwise owed to you.

Water-Right may process your Personal Data based on Water-Right's legitimate interests in communicating with you about our products and services, and about scientific research and educational opportunities. You have the right to opt-out of all such processing of your Personal Data. You may do so by contacting us as described in the "Your Privacy Choices" section.

## **Information We Share**

We only share your Personal Data with third parties as described below. We do not sell or rent Personal Data to third parties for their own marketing purposes.

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### ***Third-Party Advertising and Online Behavioral Advertising***

You may be provided with online advertisements of Water-Right products and services on third-party websites and mobile services that are tailored to you, for example, on the basis of information that you provide to Water-Right or a third-party website you are visiting, or of your browsing activity, purchases, or interests. These types of tailored online advertisements may come through several sources, such as the following:

- We may share with our advertising service providers your non-identifying information that we have obtained from cookies and other tracking technologies on our Water-Right Sites.
- Water-Right Sites may participate in online behavioral advertising (this is also sometimes called re-target advertising or interest-based advertising). Our advertising network partners may place and use cookies on Water-Right Web sites and on other third-party Web sites to collect information about your activities in order to provide you with online advertisements that are based on your interests.
- Some Web browsers may transmit “do-not-track” signals to Web sites with which the browser communicates. As of the Effective Date of this Privacy Notice, an industry standard has not yet been established on how to respond to these signals. Therefore, Water-Right Sites do not respond to these signals. As discussed above, you can opt-out from advertisers that use your browsing history to deliver online behavioral advertisements by visiting [adchoices](#).

### ***Affiliates, Vendors and Suppliers***

We have relationships with suppliers and affiliated companies, who help us operate our business and for whom it may be necessary to have access to your Personal Data in the course of providing services to Water-Right. We will not authorize these parties to use your Personal Data for any purpose that is not related to Water-Right and its related affiliates business operation, and we do not share Personal Data unless consent has been obtain in advance to sharing with related affiliates. We require them to handle your Personal Data collected in accordance with this Privacy Notice.

### ***Co-branded Sites***

We may partner with other companies to provide you with content or services on a joint or “co-branded” basis. At a co-branded site, you will see both the Water-Right logo and the logo of the co-branding partner displayed on your screen. You should read the individual privacy policies of our co-branding partners, as they may differ in some respects from ours. Reading these policies will help you to make an informed decision about whether to provide your information to a given site.

### ***Product Reports***

If you contact Water-Right regarding your experience in using one of our products, we may use the information that you provide in submitting reports to the designated government regulatory authority, as required of us by law.

### ***Legal Rights and Obligations***

In certain limited circumstances, Water-Right may need to disclose your Personal Data in order to comply with a legal obligation or demand, such as to respond to valid legal process (e.g. a search warrant, a court order, or a subpoena) or to comply with reporting obligations to our governing regulatory authorities regarding the safety of our products, or in connection with one of our product lines or divisions, which includes the services provided through one or more of the Water-Right Sites. In such instances, we will take measures to protect your Personal

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Data to the extent possible. We also reserve the right to use Personal Data to investigate and prosecute users who violate our rules or who engage in behavior that is illegal or harmful to others or to others' property.

### ***Change in Organization***

In the event Water-Right decides to reorganize or divest our business through sale, merger, or acquisition, Water-Right may share Personal Data about you with actual or prospective purchasers. We will require any actual or prospective purchasers to treat this Personal Data in a manner consistent with this notice.

### **Children's Privacy**

Water-Right does not knowingly collect or use any personal information directly from children on Water-Right Sites (Water-Right defines "children" as minors younger than 18 or the equivalent minimum age in the jurisdiction where you reside). We do not knowingly allow children to communicate with us, or to use any of our online services. If you are a parent and become aware that your child has provided us with information, please contact us using one of the methods specified below, and we will work with you to address this issue.

### **Your Privacy Choices**

You have the right to see and get a copy of Personal Data about you that we maintain as well as to ask us to make corrections to inaccurate or incomplete Personal Data about you. You have the right to receive data you have provided to us in a machine-readable format and to transmit that data to another controller. You may also request the erasure of your Personal Data or the restriction of its processing, or object to the processing of Personal Data about you. To seek access to Personal Data about you, to file a concern, complaint, or request for correction, or to opt-out of particular programs, please contact our Privacy Office by clicking on the "Contact Us" link on the Water-Right Site you are using, by using the Water-Right contact information on the Water-Right mobile application you are using, or by emailing us at [privacy@water-right.com](mailto:privacy@water-right.com). You may also send a letter to the following address:

Water-Right Inc.  
Attn: Privacy Policy  
1900 Prospect Ct  
Appleton, WI 54914

For more information about your privacy rights, or if you are not able to resolve a problem directly with us and wish to make a complaint, contact your local authority.

In all communications to Water-right, please include your email address, the Web site address, mobile application, and/or the specific Water-Right product to which you provided Personal Data (e.g., [water-right.com](http://water-right.com)), and a detailed explanation of your request. If you would like to delete, amend, or correct your Personal Data and are contacting us by email, please put "Deletion Request" or "Amendment/Correction Request" in the subject line of the email. We will respond to all reasonable requests in a timely manner and may need to further confirm your identity in order to process certain requests.

### **Data Security**

Water-Right maintains reasonable technical, administrative and physical controls to secure any Personal Data collected through the Water-Right Sites. However, there is always some risk that an unauthorized third party could intercept an Internet transmission, or that someone will find a way to thwart our security systems. We urge you to exercise caution when transmitting Personal Data over the Internet, especially your financial-related information.

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Water-Right cannot guarantee that unauthorized third parties will not gain access to your Personal Data; therefore, when submitting Personal Data to Water-Right Sites, you must weigh both the benefits and the risks.

### **Warranties and Disclaimers**

Water-Right Inc. and its affiliates and subsidiaries respect your privacy, value our relationship, and are committed to safeguarding your privacy. We understand the importance of privacy to our customers and visitors to the Water-Right websites. Our use of Personal Data is governed by our Privacy Policy and by accessing and using the Water-Right websites, you agree to be bound by that Privacy Policy.

You recognize and agree that when submitting your personally identifiable information to Water-Right websites, while Water-Right has safeguards in place to prevent unauthorized access or interception, there is no absolute guarantee of security. IN THE UNLIKELY EVENT OF AN INTERCEPTION OR UNAUTHORIZED ACCESS DESPITE OUR EFFORTS, WATER-RIGHT SHALL NOT BE RESPONSIBLE FOR SUCH INTERCEPTIONS OR UNAUTHORIZED ACCESS, OR ANY DIRECT, INDIRECT, SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES (INCLUDING LOST PROFITS) SUFFERED BY A CUSTOMER OR USER, EVEN IF WATER-RIGHT HAS PREVIOUSLY BEEN ADVISED OF THE POSSIBILITY OF SUCH DAMAGES, WATER-RIGHT DOES NOT WARRANT, EITHER EXPRESSLY OR IMPLIED, THAT THE INFORMATION PROVIDED BY ANY CUSTOMER SHALL BE FREE FROM INTERCEPTION OR UNAUTHORIZED ACCESS, AND DOES NOT PROVIDE ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE. SOME JURISDICTIONS DO NOT ALLOW THE EXCLUSION OF CERTAIN WARRANTIES. TO THE EXTENT PERMITTED BY APPLICABLE LAW, WE EXCLUDE ALL WARRANTIES.

### **Third Party Sites and Social Media Plug-ins**

This Privacy Notice does not apply to Water-Right Sites that do not link to this Privacy Notice, or to third-party Web sites to which Water-Right Sites may link. Water-Right Sites may use social media plug-ins (e.g., the Facebook “Like” button, “Share to Twitter” button) to enable you to easily share information with others. When you visit Water-Right Sites, the operator of the social plug-in can place a cookie on your computer or other electronic device that enables that operator to recognize individuals who have previously visited our Site. If you are logged into the social media Web site (e.g., Facebook, Twitter) while browsing on our Water-Right Site, the social media plug-in allows that social media Web site to receive information that you have visited our Water-Right Site. The social media plug-in also allows the social media Web site to share information about your activities on our Water-Right Site with other users of their social media Web site. These sharing settings are managed by the social media Web site and governed by its privacy policy.

### **Accessing Our Sites Globally**

This site is owned and operated by Water-Right in the United States, but the information you provide will be accessible to our affiliates, vendors, and suppliers in other countries. Furthermore, if you are visiting this site from a country other than the United States, your communication can result in the transfer of information across international borders. The level of legal protection for personal information is not the same in all countries; however, we will take the security measures described in this Privacy Notice in an effort to keep your information secure. By using this site, you understand that your Personal Data will be stored and processed in the United States.

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### **Notice to California Residents**

Subject to certain limits under California Civil Code § 1798.83, California residents may ask us to provide them with (i) a list of certain categories of Personal Data that we have disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year, and (ii) the identity of those third parties. To make this request, California residents may contact us at [privacy@water-right.com](mailto:privacy@water-right.com).

### **Changes to Our Privacy Policy**

We will only use Personal Data in the manner described in this Privacy Policy in effect when the information was collected from you or as authorized by you. However, and subject to any applicable consent requirements, we reserve the right to change the terms of this Privacy Policy at any time. Any changes to this Privacy Policy will be reflected on this page with a new effective date. Water-Right encourages you to review this Privacy Policy regularly for any changes. Any Personal Data collected upon your continued use of Water-Right Sites will be handled in accordance with the currently-posted Privacy Policy.