

# Privacy Policy

Last updated: June 12, 2026

This Privacy Policy (the “Policy”) explains how Wilson Tool Enterprises, Inc. (“Wilson Tool Enterprises,” “we,” “us,” or “our”) collects, uses, discloses, and protects your personal information when you visit our website ([wilsontool.com](http://wilsontool.com)), transact business with or purchase products from us, communicate with us, or otherwise interact with us online or offline. By using this website, engaging in business with us, communicating with us, or otherwise interacting with us, you consent to the practices described in this Policy. If you do not agree, please do not provide us with your personal information.

Please note that this Privacy Policy also covers USA-based Wilson Tool Enterprises, Inc. owned subsidiaries, including Wilson Tool International, Inc., aspectLED (ASP Holdings, Inc.) Inc., and Doering Company, LLC.

## 1. Information We Collect

### A. Personal Information You Provide or Make Available

For the purposes of this Policy, “personal information” is any information that identifies, relates to, or can be used to contact a particular individual. The types of personal information we collect and receive about you includes the following categories.

- **Contact information:** First name, last name, employer, employment position, mailing address (personal or employment), email address (personal or employment), and telephone number (personal or employment).
- **Customer support information:** Copies of any communications or inquiries you submit to us, including customer support requests, through email, calls, forms, social media, or other means.
- **Device, usage, location, and preference information:** Details regarding how and when you use our website, including the frequency and duration of your usage, the pages you view, and information about your interaction with our websites.
- **Marketing information:** Details regarding promotional materials you may have requested or received from us, the services in which you are interested, your receipt of newsletters or other promotional communications, and information on your marketing or communication preferences.

- **Transactional information:** Details about your or your company's transactions with us, including products purchased, method of payment, relevant billing or shipping addresses, payments received, transaction history, and other information relating to the products or services purchased by you or your company.

We collect this information when you access, use, or navigate our website, purchase products on our webstore, fill in forms on our website, request information, communicate with us (including by phone, email, chatbot, or otherwise), interact with features of our website, visit or engage with our social media pages, participate in surveys or sponsored activities, or otherwise provide us with personal information.

Please note that we may aggregate or anonymize the foregoing types of data such that they are no longer capable of identifying you, in which case they are no longer considered "personal information."

#### B. Automatically Collected Personal Information

Like most website operators, we use various technologies to collect certain types of information about the users of our website. Please note that the vendors that supply us the pixels, tags, web beacons, cookies, and the other tracking technologies discussed below collect your personal information simultaneously with our collection of such information.

The technologies we use on our website include the following.

- **Pixels, tags, web beacons, gifs, and similar code-based technologies.**  
These technologies are small pieces of code that run when a website page or an email is loaded. They are used to monitor the behavior of the visitor or email recipient (such as what icons were clicked or whether links in an email were opened) and gather analytics and details about the interaction. For example, when you open our homepage, a pixel may run and generate information based on the visit (e.g., what day and time you were on the homepage), and then this information is processed by us or our vendors. Pixels work in conjunction with cookies to let us know what portions of our website are of interest to you and to help us provide you with tailored information. Even if you have disabled or turned off cookies (discussed below), the pixels, tags, and web beacons we use may still detect and collect certain information about your interaction with our website.
- **Cookies:** Cookies are small text files that can be used by websites to make a user's experience more efficient. Our website uses different types of cookies to, among other things, automatically recognize you when you return to our website, store information regarding your preferences, and analyze traffic to our website. Please note that where cookies are essential to the operation of our website, if disabled, you may not be able to enjoy certain features of the website. For further

information about cookies, including how to refuse cookies, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org). ***We do not honor “Do Not Track” signals.***

- **Log Files.** We use log files to track actions occurring on our website and to collect data about visitors, including Internet service provider, referring/exit pages, and date/time stamps. This information is used for security purposes and to detect and prevent fraud.
- **Analytics.** Our website may also deploy third-party analytics tools, such as Google Analytics and BrightEdge. You can find more information about how data is collected and processed in connection with the Google Analytics [here](#) and BrightEdge [here](#).

These technologies may be set or controlled by use (first-party technologies) or they may be set or controlled by third-party vendors or partners (third-party technologies). Further, these technologies can be categorized as follows.

- **Essential:** These technologies are necessary for the website to function and cannot be switched off in our systems. Examples include: cookies that allow pages to load correctly.
- **Performance:** These technologies allow us to count visits and traffic sources so we can measure and improve the performance of our Website. They help us to know which pages are the most and least popular and see how visitors move around the Website. Examples include: technologies we use for analytics.
- **Functional:** These technologies are not strictly necessary for the website to function but help us improve your experience and understand how our site is used. Examples include: cookies and pixels that analyze your browser settings and preferences.
- **Advertising:** These technologies support features like embedded videos or social media sharing. These technologies may collect personal information and may track your activity across other websites.

The information collected through these technologies may be combined with personal information or aggregated with other information we technologically or manually collect about or from you. We may share information about your use of our website with our advertising and analytics partners, who may combine it with other information that you previously provided to them.

For more information regarding our use of these technologies, please see our Cookie Management Tool. Please see the Section 6 (Your Choices & Rights) for more information about options you may have to with respect to these technologies.

### C. Personal Information from Other Sources

We may obtain both personal and non-personal information about you from affiliates, business partners, suppliers, and other third parties and add it to other information we have collected. We, and the third parties we engage, may combine information we collect from you with information obtained from other sources. For example, we may obtain personal information from third party vendors in connection with our efforts to comply with export control laws.

### D. Personal Information from Social Media

If you interact with us on any social media platform: (i) depending on your social media privacy settings, the personal information that you submit on the social media platform may be read, collected, or used by us as described in this Policy, and (ii) where we respond to any interaction with you on social media, your account name/handle may be viewable by any and all members or users of our social media accounts. Social media platforms operate independently from us and we are not responsible for the personal information that you choose to submit or link on any social media platform. We encourage you to review the privacy policies and settings of any social media platform with which you interact to help you understand their privacy practices.

## 2. How We Use Personal Information

We (or service providers acting on our behalf) use your personal information for the following purposes:

- Negotiating, entering into, and managing our business relationship, agreements, and transactions with your company.
- Providing requested products and services, including responding to sales requests, providing quotes for products and services, providing updates on orders
- Communicating with you and responding to your inquiries and communicating regarding our products and services, our agreements with you or your company, and other issues.
- Informing you about new products, responding to your inquiries, managing customer services issues, and otherwise communicating with you regarding the products or services for your company.
- Providing and optimizing your experience using our website and ensuring that our content is presented to you in the most effective manner. This includes by leveraging third-party service providers who may assist with or facilitate our website's functionalities to gather analytics and other insights into the users who visit our website.

- Developing, updating, and improving our goods and services, website, customer service, and customer experience, and otherwise improving our knowledge and insights regarding customers.
- Sending you promotional or informational communications and solicitations, tracking your marketing preferences, engaging in analytics on our website, and for our internal marketing purposes.
- Notifying you about changes to our services, the terms governing our services, or material changes to this Policy.
- Enforcing our agreements with you or your company, complying with our legal or regulatory obligations, and defending or advancing legal claims.
- Performing other functions as otherwise described to you at the time of collection or to which you otherwise consent.

For more information about your options relating to your personal information and your communication preferences, see “Your Choices About Personal Information” below.

### **3. Sharing of Your Personal Information**

When the information we collect about you is aggregated, anonymized, or otherwise does not identify you, we may use that information for any purpose or disclose it to third parties, to the extent permitted by applicable law.

In addition, we may share your information with the following:

- Service providers and third-party vendors we use to administer our business and as necessary to conduct our business. For example, vendors we use to send newsletters, analytics providers that assist with Search Engine Optimization (SEO), payment processing providers, IT service providers.
- Legal authorities, courts, regulators, or other governmental entities where required by applicable law, regulation, court order, subpoena, search warrant, or other lawful request for information.
- Marketing and advertising vendors that may assist with lead generation, hosting information relating to customers and business partners and potential customers or business partners, marketing automation, advertisement placement and targeting, and marketing campaigns and communications. Analytics vendors in order to understand our website traffic and usage patterns, optimize our website, track marketing conversions, and identify potential new customers or users.
- Affiliates, related entities, and business partners who may offer products or services that are relevant to your company.
- Our professional advisors, such as lawyers, accountants, and other similar advisors.
- Buyers or other successors prior to or in the event of a merger, sale, divestiture, restructuring, dissolution, or reorganization, or sale or transfer of some or all of

our assets, whether as a going concern or part of a bankruptcy, liquidation, or similar proceeding.

- Other parties for any purpose we disclose at the time you provide personal information.

## 4. Cross-Border Data Transfers

It may be necessary for us to transfer your personal information from the country where you reside to the United States or another country where we conduct business. In that event, we will implement appropriate mechanisms to transfer your personal information in compliance with applicable laws. For example, if you are located in the EU, the UK, or Switzerland, it may be necessary for us to transfer your personal information to the United States. Wilson Tool Enterprises complies with the EU-U.S. Data Privacy Framework, UK Extension to the EU-U.S. Data Privacy Framework, and Swiss-U.S. Data Privacy Framework (collectively, the “DPF”) as the appropriate lawful mechanism for such transfers.

## 5. Retention of Data

We retain personal information for as long as necessary to fulfil the purposes we collected it, including for the purposes of satisfying any legal, accounting, or other mandatory reporting requirements. To determine the appropriate retention period, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure, the purposes for which we process it, whether we can achieve those purposes through other means, and the applicable legal requirements. We also consider any specific limitation periods under applicable law.

- Non-commerce data is retained for 7 years.
- Commerce data is retained to the extent that such data is necessary for providing Wilson Tools’ products and services, based on the terms of Wilson Tool’s contractual obligations with its customers, or until requested to be removed by a customer and is allowed by applicable laws.
- Analytics data (Google Analytics): retained per Google’s configured retention period (default 26 months).

## 6. Your Choices & Rights

### A. Tracking Technologies and Advertising

Depending on your browser or device, you may have the option to set the browser to accept all cookies, reject all cookies, notify you when a cookie is set, or delete cookies. Each browser and device are different, so we recommend you evaluate the tools and settings available in your browser or device, as well as any available instructions for the

same. In addition, you may configure cookie settings using our cookie management tool here. Please note that if you disable or delete cookies, you may not be able to access or use certain features of our website.

The National Advertising Initiative also makes resources available to assist consumers in opt-out of certain tailored online ads, which you can access at <https://optout.networkadvertising.org/?c=1>.

#### B. Marketing Emails

As required by applicable laws, you can opt-out of receiving promotional emails from us by clicking the “opt out,” “unsubscribe,” or similar link in any such promotional emails and following the instructions provided. You can also opt out of receiving certain communications by contacting us at the “Contact Us” information below. Such requests will be forwarded to the Wilson Tool Enterprises CISO to direct us on appropriate action.

#### C. Analytics Tools

We use Google Analytics, BrightEdge, and similar tools in connection with our website. If you would like to refrain from having your data collected by these tools, use the following links.

- Google Analytics opt-out: <https://tools.google.com/dlpage/gaoptout>
- BrightEdge privacy policy and opt-out instructions: <https://www.brightedge.com/privacy#Controls>
- Facebook Pixel opt-out: <https://www.facebook.com/help/1224342157705160/>

#### D. Updating Your Information

We take reasonable steps to keep your personal information accurate and complete. You can access or update your personal information, including contact or account information, by contacting us at the “Contact Us” information below.

#### E. Declining to Provide Information

You can choose not to provide us with information we may request, but that may result in you being unable to use certain features of our website, request information about our Services, or initiate other transactions with us.

#### F. Do Not Track Mechanisms

Please note that our website do not honor “Do Not Track” signals, and such signals will not impact the operation of our website. Do Not Track signals are different than the Global Privacy Control (more information about GPC can be found at <https://globalprivacycontrol.org/>).

## G. Rights Available Under Certain Laws

The laws of the country or state in which you reside may provide you with certain rights concerning your personal information. For example, you have the right to:

- Access, obtain copies of, correct, or delete your personal information.
- Opt-out of non-essential uses or disclosures of your information, such as the sale of your personal information or use of it for targeted advertising.
- Withdraw consent to specific uses of your personal information.
- Object to the processing of your personal information in connection with certain types of automated decision-making.

To the extent available, and subject to any exceptions, we will respond to requests to exercise such rights in compliance with the timing requirements of any applicable laws. You may submit a request for these rights as set forth in Section 14 (“How to Make Requests”).

## 7. Security

We implement appropriate technical, physical, and organizational measures to protect personal data, including encryption, restricted access, and periodic security reviews. No system is 100% secure, so we cannot ensure or warrant the security of any information you transmit to us. Nevertheless, we work to maintain safeguards appropriate to the sensitivity of such information.

## 8. California Residents’ Rights

This Section of our Policy applies solely to “consumers” as defined by the California Consumer Privacy Act, as amended by the California Privacy Rights Act (collectively, the “CCPA”), and describes our activities when we are acting as a business, as defined by the CCPA.

### CALIFORNIA PRIVACY POLICY

This Section describes our online and offline practices with respect to collecting, processing, and disclosing personal information relating to California residents, as required by the CCPA.

#### A. Personal Information We Collect and Disclose

In the past 12 months, we have collected the following categories of personal information from consumers and disclosed such information to the following categories of third parties for the business or commercial purposes described below.

<b>Categories of PI Collected</b>	<b>Examples</b>	<b>Categories of Third Parties to Whom Disclosed</b>
Identifiers	A real name, alias, postal address, email address, account username, or other similar identifiers	<ul style="list-style-type: none"> <li>• IT and cloud/hosting service providers, such as our email providers, business application providers, managed services providers and IT consultants</li> <li>• Analytics and marketing/advertising vendors and service providers</li> <li>• Vendors for the purposes of providing goods and services ordered (e.g., for shipping and handling, supplier order, etc.)</li> <li>• Financial institutions and payment processors</li> <li>• Professional advisors (accountants, lawyers, and auditors)</li> </ul>
Commercial information	Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	<ul style="list-style-type: none"> <li>• IT and cloud/hosting service providers, such as our email providers, business application providers, managed services providers and IT consultants</li> <li>• Analytics and marketing/advertising vendors and service providers</li> <li>• Vendors for the purposes of providing goods and services ordered (e.g., for shipping and handling, supplier order, etc.)</li> <li>• Financial institutions and payment processors</li> <li>• Professional advisors (accountants, lawyers, and auditors)</li> </ul>
Internet or other similar network activity	Browsing details, search details, information about your interaction with the website, including clicking tendencies and time spent on a	<ul style="list-style-type: none"> <li>• IT and cloud/hosting service providers, such as our email providers, business application providers,</li> </ul>

	page, and other similar event or session data.	managed services providers and IT consultants <ul style="list-style-type: none"> <li>• Online analytics and marketing/advertising service providers</li> </ul>
Personal information types listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) (“California Customer Records”)	A name, signature, physical characteristics or description, address, telephone number  *Some personal information included in this category may overlap with other categories.	<ul style="list-style-type: none"> <li>• IT and cloud/hosting service providers, such as our email providers, business application providers, managed services providers and IT consultants</li> <li>• Analytics and marketing/advertising vendors and service providers</li> <li>• Vendors for the purposes of providing goods and services ordered (e.g., for shipping and handling, supplier order, etc.)</li> <li>• Financial institutions and payment processors</li> <li>• Professional advisors (accountants, lawyers, and auditors)</li> </ul>

From time to time, we may be required to disclose your information to governmental authorities for the purpose of complying with applicable laws and regulations or in response to legal process. We may also disclose your personal information to third parties in connection with the sale of our business or assets, or any merger or similar corporate matter, when your personal information is part of the assets involved in such transaction. Finally, we may “aggregate” or “deidentify” information from you pursuant to the CCPA, in which event the information is no longer considered “personal information.”

**B. Applicable Retention Periods**

Section 5 (Retention of Data) explains our retention practices.

**C. Categories of Sources of Personal Information**

Section 1 (Information We Collect) identifies the sources from which we collect personal information.

**D. How We Use Personal Information**

Section 2 (How We Use Personal Information) explains the business and commercial purposes for which we use personal information.

#### E. Sensitive Personal Information

We do not use or disclose “sensitive personal information” (as defined by the CCPA) for the purposes of inferring any characteristics about California consumers. As a result, we treat all such information as “personal information,” for the purposes of our obligations under the CCPA.

#### F. Business Purpose Disclosures of Personal Information

We may disclose the personal information we collect to third parties for the business purposes described in Section 2 (How We Use Personal Information) and the table below.

#### G. Sale, or Sharing of Personal Information

In the past 12 months, we have not “sold” or “shared” (as those terms are defined by the CCPA) any personal information of any California resident. We do not have actual knowledge that we sell or share the personal information of consumers under 16 years of age.

#### H. Additional Categories or Other Purposes

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. If required by law, we will also seek your consent before using your personal information for a new or unrelated purpose.

#### I. Your Rights Under the CCPA

Subject to exceptions, the CCPA provides California residents with the following rights discussed below.

1. *Right to Know.* You have the right to request that we disclose one or more of the following:
  - The categories of personal information we collected about you;
  - The categories of sources for the personal information we collected about you;
  - The business and commercial purposes for collecting (or selling or sharing, if applicable) your personal information;
  - The categories of third parties to whom we disclose (or sell or share, if applicable) your personal information;
  - The specific pieces of personal information we collected about you;

- If we disclosed your personal information for a business purpose, the categories of personal information received by each category of third party; and
  - If applicable, the categories of personal information that we sold, and for each category, the categories of third parties whom such information was sold.
2. *Right to Request Deletion.* You have the right to request that we delete personal information we collected from you, subject to any exceptions or limitations under the CCPA.
  3. *Right to Correct Inaccurate Information.* If we maintain inaccurate personal information about you, you have the right to request that we correct that inaccurate personal information, taking into account the nature of the personal information and the purposes of the processing of the personal information.

California consumers also have the right to opt out of the selling of their personal information, sharing of their personal information for cross-context behavioral advertising, and to limit the use or disclosure of sensitive personal information by the business if such information is used or disclosed for certain purposes, as required by the CCPA. Because Wilson Tool does not engage those activities, those rights are not available.

J. Exercising Your Right to Know, Request Deletion, or Correct Inaccurate Information

To exercise the rights described above, you—or someone authorized to act on your behalf—must submit a verifiable consumer request to us by sending an e-mail to: [wtcompliance@wilsontool.com](mailto:wtcompliance@wilsontool.com) with the subject line: “CCPA Request,” or calling us at **[insert toll-free phone number]**. Your request must include your name, email address, mailing address, phone number, the nature of your inquiry and the context in which we may have received your information. To the extent permitted by the CCPA, we may request additional information to verify you. If you are an agent submitting a request on behalf of a consumer, we may request that you submit a signed permission from the consumer authorizing you to make the request.

Please be aware that the CCPA provides certain limitations and exceptions to the foregoing rights, which may result in us denying or limiting our response to your request.

K. Our Commitment Not to Discriminate

Consistent with the CCPA, we will not discriminate against you for exercising any of your CCPA rights by:

- Denying you goods or services.
- Charging you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Providing you a different level or quality of goods or services.

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

#### L. Data Disclosures for Direct Marketing Purposes

California Civil Code § 1798.83 (California's Shine the Light Act) further permits California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. If you are a California resident, you may ask us to refrain from providing your personal information to certain of our affiliates and other third parties for their marketing purposes. Please note that while we do not currently disclose your personal information to third parties for direct marketing purposes, you may still tell us your preference for disclosing your personal information to our affiliates by contacting us at the contact information below.

## 9. European Privacy Rights and DPF Commitments

### A. Rights Under the General Data Protection Regulation

Individuals in the EU, the UK and Switzerland have rights under the General Data Protection Regulation ("GDPR") (or an analogous data protection law, such as the Swiss FADP) and the DPF have the following rights with respect to their personal information. Note that not all rights apply in all circumstances.

- Right of access: subject to certain exceptions, you have the right to access the personal information that we hold about you. If you request access to data to protect the rights of others, we may require validate your identity before releasing information to you.
- Right to rectify your personal information: if you discover that the information we hold about you is inaccurate or incomplete, you have the right to correct the information.
- Right to erasure: you may ask us to delete information we hold about you in certain circumstances. This right is not absolute, and it may not be possible for us to delete the information we hold about you, for example, if we have an ongoing contractual relationship or are required to retain information to comply with our legal obligations.
- Right to restriction of processing: in some cases, you may have the right to have the processing of your personal information restricted. For example, where you contest the accuracy of your personal information, its use may be restricted until the accuracy is verified.
- Right to object to processing: you may object to the processing of your personal information (including profiling) when it is based upon our legitimate interests. You may also object to the processing of your personal information for the purposes of direct marketing and for the purposes of statistical analysis.

- Right to data portability: you have the right to receive, move, copy, or transfer your personal information to another controller when we are processing your personal information based on consent or on a contract and the processing is carried out by automated means.

You may also have the right to make a complaint to the relevant Supervisory Authority. A list of EU Supervisory Authorities is available here: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en).

For the UK, please visit: <https://ico.org.uk/make-a-complaint/>.

For Switzerland, please visit: <https://www.edoeb.admin.ch/en/contact-2>.

With regard to the personal information discussed in this Policy, we are typically the “data controller” for such information under the GDPR. If you wish to exercise one of the rights discussed above, or if you need further assistance regarding your rights, please follow the instructions in Section 14 (How to Make Requests) or contact us using the contact information provided in Section 15 (How to Contact Us). We will consider and respond to your request in accordance with applicable law. In some cases, our ability to comply these requests may be subject to exceptions or depend upon our obligations to process personal information for security, safety, fraud prevention reasons, compliance with regulatory or legal requirements, or because processing is necessary to deliver the services you have requested. Where this is the case, we will inform you of specific details in response to your request.

## B. Lawful Basis Under GDPR

GDPR information is used as directed by Wilson Tool Enterprises Chief Information Security Officer, or CISO. We will use different lawful basis under the GDPR to process personal information, depending on the nature of the information and your relationship with us. The following table describes how our CISO has directed us to use your personal information and our lawful basis for doing so. We may process your personal information on more than one basis depending on the specific purpose for which we have collected or use the information. We will not work at the direction of any other controller outside of the CISO of Wilson Tool Enterprises.

<p>To enter into and subsequently to manage our business relationship with your company, including:</p> <ul style="list-style-type: none"> <li>• Negotiating, entering into, and performing</li> </ul>	<ul style="list-style-type: none"> <li>• Contact information</li> <li>• Customer support information</li> <li>• Transactional information</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to manage our business relationships and administer our operations including through the keeping of</li> </ul>
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<p>agreements with your company</p> <ul style="list-style-type: none"> <li>• Responding to inquiries and providing customer support and service</li> <li>• Managing and processing transactions for our products</li> <li>• Notifying you about changes to our products, Services, business terms, or this Policy</li> <li>• Communicating with you and responding to your inquiries regarding our products, agreements with you or your company, and other issues</li> </ul>		<p>appropriate records)</p> <ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary to comply with legal obligations</li> </ul>
<p>To administer and protect our business including:</p> <ul style="list-style-type: none"> <li>• Maintaining business records for legal purposes and to comply with tax requirements</li> <li>• Defending and advancing legal claims</li> <li>• Enforcing our rights under any agreements</li> <li>• Ensuring effective security for our website and Services</li> <li>• Conducting website maintenance</li> </ul>	<ul style="list-style-type: none"> <li>• Contact information</li> <li>• Customer support information</li> <li>• Transactional information</li> <li>• Device, usage, location and preference information</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (running our business, facilitating administration and IT services, network security, to prevent fraud, or in the context of a business reorganization or restructuring)</li> <li>• Necessary to comply with legal obligations</li> </ul>

<ul style="list-style-type: none"> <li>Identifying and addressing security risks and unlawful activity</li> </ul>		
To make decisions about how optimize our Services, advertisements, and marketing efforts, and to better understand the effectiveness of our marketing efforts	<ul style="list-style-type: none"> <li>Marketing information</li> <li>Transactional information</li> <li>Device, usage, location, and preference information</li> </ul>	Necessary for our legitimate interests (better understanding website functionality and how website users navigate and interact with the site)
To advance and promote our business interests including contacting you regarding products, Services, or promotions that may be of interest to your company, conducting surveys or soliciting feedback on our services, and updating, developing, and improving our products/services, customer service, and marketing efforts	<ul style="list-style-type: none"> <li>Contact information</li> <li>Account information</li> <li>Marketing information</li> <li>Transaction information</li> <li>Device, usage, location, and preference information</li> </ul>	Necessary for our legitimate interests (to enhance our services, improve our marketing strategies and develop our business) Consent

### C. Additional Information Regarding Data Privacy Framework (DPF) and Transfers from the EU, Switzerland, and UK

In connection with transfers of personal information to the United States from the EU, Switzerland, or UK, Wilson Tool Enterprises complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Wilson Tool Enterprises has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. Wilson Tool Enterprises has also certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S.

DPF Principles and Swiss-U.S. DPF Principles (collectively referred to as the “DPF Principles”), the DPF Principles shall govern. To learn more about the Data Privacy Framework Program (DPF Program), and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

With respect to personal data received or transferred pursuant to the DPF Program, Wilson Tool Enterprises is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission.

Pursuant to the DPF Program, EU, UK, and Swiss individuals have the right to obtain our confirmation of whether we maintain personal information relating to you in the United States. Upon request, we will provide you with access to the personal information that we hold about you. You may also correct, amend, or delete the personal information we hold about you. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data transferred to the United States in reliance on the DPF Program should direct their query to [wtcompliance@wilsonstool.com](mailto:wocompliance@wilsonstool.com). If requested to remove data, we will respond within a reasonable timeframe.

We will provide an individual opt-out choice, or opt-in for sensitive data, before we share your data with third parties other than our agents, or before we use it for a purpose other than which it was originally collected or subsequently authorized. To request to limit the use and disclosure of your personal information, please submit a written request to [wtcompliance@wilsonstool.com](mailto:wocompliance@wilsonstool.com).

In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

If you are an EU, UK, or Swiss individual, where we transfer your personal data to third party service providers who perform services for us or on our behalf, we are responsible for the processing of that data by them and shall remain liable if they process your personal data in a manner inconsistent with the DPF Principles, unless we prove that we are not responsible for the event giving rise to the damage.

In compliance with the DPF Principles, Wilson Tool Enterprises commits to resolve DPF Principles-related complaints about your privacy and our collection or use of your personal information. European Union, United Kingdom, and Swiss individuals with inquiries or complaints regarding our handling of personal data in reliance on the DPF should first contact [wtcompliance@wilsonstool.com](mailto:wocompliance@wilsonstool.com).

Wilson Tool Enterprises has further committed to refer unresolved DPF Principles-related complaints to a U.S.-based independent dispute resolution mechanism, BBB NATIONAL PROGRAMS. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed by us, please visit [www.bbbprograms.org/dpf-complaints](http://www.bbbprograms.org/dpf-complaints) for more information and to file a complaint. This service is provided free of charge to you.

If your DPF complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See <https://www.dataprivacyframework.gov/framework-article/ANNEX-I-introduction> for more information on this process.

## 10. Canadian Residents' Rights

If you reside in Canada, various Canadian laws, including Canada's Personal Information Protection and Electronic Documents Act ("PIPEDA"), may provide you certain rights with respect to your personal information, including the right to request information about the collection, use, or disclosure of your personal information, to request access to your personal information, and to challenge the accuracy and completeness of your personal information and have it amended as appropriate.

If you are a Canadian resident and would like to make a request regarding your personal information, please follow instructions in Section 14 (How to Make Requests) or contact us using information in Section 15 (How to Contact Us). We will attempt to respond to your request as quickly as possible but may ask you to provide additional information to enable us to locate the personal information or determine how it has been used or disclosed. We will provide you access, as appropriate, at minimal or no cost to you.

## 11. Brazil Residents' Rights

### A. Rights Under LGPD

If you are a resident of, or otherwise located in, Brazil or any of its national territories, the General Personal Data Protection Law of Brazil, as amended ("LGPD") may afford you certain rights with respect to your personal information that is "processed" by us in our capacity as a "controller" (as those terms are defined by the LGPD), including the following:

- Right to obtain confirmation of the existence of the processing of your personal information by Wilson Tool.
- Right to obtain access to the personal information processed by Wilson Tool.
- Right to obtain correction of incomplete, inaccurate, or out-dated personal information.
- Right to obtain anonymization, blocking, or deletion of unnecessary or excessive personal information or personal information processed in noncompliance with the provisions of the LGPD.
- Right to obtain portability of the personal information processed by Wilson Tool to another service provider or product provider, by the means of an express request, in accordance with Brazil's regulations, and subject to commercial and industrial secrets.

- Right to obtain deletion of personal information processed with your consent, except when storage of the personal information is authorized by applicable law (e.g., in order for Wilson Tool to comply with its legal or regulatory obligations, or where use is exclusive to Wilson Tool and the personal information has been anonymized).
- Right to obtain information about entities with which Wilson Tool has shared your personal information.
- Right to obtain information about the possibility of denying consent for Wilson Tool to process your personal information and the consequences of such denial.
- Right to revoke consent at any time, by express request, through a facilitated and free of charge procedure, with processing carried under previously given consent remaining valid as long as there is no request for deletion.

If you wish to exercise one of the rights discussed above, you or your legally constituted representative, may do so by submitting an express written request following the instructions in Section 14 (How to Make Requests) or contacting us using the information in Section 15 (How to Contact Us). Please note that, consistent with the LGPD, we strive to adopt security, technical, and administrative measures to protect personal information from unauthorized access and accidental or unlawful situations of destruction, loss, or improper or unlawful processing. Such measures may result in us requesting specific information from you to help us confirm your identity, which may affect the timeliness of our response to your request.

You also have the right to petition, regarding your personal information, against us before the national authority responsible for supervising, implementing and monitoring compliance with the LGPD in Brazil.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

## B. Purposes, Types and Duration of Processing and Sharing Activities

We will process different types of information for different purposes under different lawful bases under the LGPD depending on the nature of the information and your relationship with us. We may process your personal information on more than one basis depending on the specific purpose for which we have collected or are otherwise using your information. We only process “sensitive personal information,” as that term is defined by the LGPD, with your consent or to comply with our legal obligations.

The table in Section 9(b) above (“Lawful Basis Under GDPR”) provides information concerning the specific purposes of the processing of your personal information and the lawful bases for processing your personal information under the LGPD.

We process your personal information by collecting, classifying, using, transmitting, distributing, storing, deleting, evaluating, controlling, modifying, communicating, transferring and disseminating the information as described in this Policy. We will process your personal information for as long as is necessary to fulfill the purposes for which it was collected or as required for us to comply with our legal obligations or contractual obligations with you.

Please refer to Section 3 (Sharing of Your Information) to learn more about the third parties with whom we share your personal information and the purposes for such sharing. Where required by the LGPD, “processing agents” with whom we share your information are bound by contracts or conditions of engagement that require care be taken by the agent with respect to the processing of your personal information and/or that such processing be at our direction and according to our instructions.

### C. International Transfers

If we transfer personal information from Brazil to the United States or any other country, we will implement appropriate legal mechanisms to ensure an adequate level of personal data protection consistent with the LGPD’s requirements. For example, we may transfer to countries that provide a level of protection of personal information that is similar to the protections afforded under the LGPD, or we may guarantee compliance with the LGPD through the use of standard contractual clauses.

## 12. Children’s Privacy

Our website and services are intended for adults (18+). We do not intentionally collect personal information from children under 13. If we learn that we have collected personal data from a child under 13 without verified parental consent, we will take steps to delete that information as required by applicable law. If you believe we may have collected information from a child under 13, contact us at [wtcompliance@wilsontool.com](mailto:wtcompliance@wilsontool.com).

## 13. Updates to this Policy

We may update this Policy from time to time. Material changes will be communicated via this website (and by email if you are subscribed). The “Last Updated” date at the top will indicate revisions.

## 14. How to Make Requests (Access, Correction, Deletion, Etc.)

To exercise your privacy rights, email [wtcompliance@wilsontool.com](mailto:wtcompliance@wilsontool.com) with subject line **Privacy Request** and include:

- (1) the email address you used on the website;
- (2) a brief description of the request (access / correction / deletion / opt-out); and
- (3) any supporting information to help us verify your identity. We will acknowledge receipt within 10 business days and will complete verified requests within 30 days of verification. We may request additional information to confirm your identity.

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, Wilson Tool Enterprises commits to refer unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S., and the Swiss-U.S. DPF. DPF to BBB National Programs, an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit <https://bbbprograms.org/programs/all-programs/dpf-consumers> for more information or to file a complaint. The services of BBB National Programs are provided at no cost to you.

## 15.

Wilson Tool Enterprises' privacy practices, described in this privacy statement, comply with the Global Cross-Border Privacy Rules (CBPRs) System. More information about the CBPR System can be found [here](#). To view our certification, please see the <https://www.globalcbpr.org/privacy-certifications/directory/>. For more information on the scope of our participation, or to [submit a privacy inquiry through BBB National Programs](#), our Accountability Agent, please click on the official seal below:



The Global PRP System Certification Mark™ is a trademark of the International Trade Administration/Office of Global Data Policy and Privacy, used with permission.



BBB National Programs has conducted an independent assessment of the privacy practices described in this privacy statement and has reviewed the company's compliance with the DPF Principles. To learn more about BBB National Programs' verification of our privacy practices, click on the DPF Verified seal that is shown here.

## 16. How to Contact Us

For questions, requests, or complaints about this Privacy Policy or our data practices, contact:

**Privacy Officer**

Wilson Tool Enterprises, Inc.

12912 Farnham Avenue

White Bear Lake, MN 55110

USA

Email: [wtcompliance@wilsontool.com](mailto:wtcompliance@wilsontool.com)