#### **Privacy Policy**

The Power Tool Institute (PTI) is a global not-for-profit membership organization whose members manufacture power tools.

We do not knowingly attempt to solicit or receive information from children. We understand that you are aware of and care about your personal privacy interests; we take those interests seriously.

This Privacy Policy describes the PTI's policies and practices regarding its collection, use, and protection of your personal data, and sets forth your privacy rights. Information privacy is an ongoing responsibility and we will from time to time update this Privacy Policy as we revise our personal data practices or adopt new privacy policies.

PTI is headquartered in Cleveland, Ohio, United States. If you have questions about PTI's personal data policies or practices, please contact us:

1300 Sumner Avenue, Cleveland, Ohio 44115 Email: <u>pti@powertoolinstitute.com</u> Phone: 216-241-7333

#### How PTI collects and uses/processes your Personal Information

You can utilize some of PTI's services without giving PTI your personal data. Much of the information on the PTI Website is available to those who are not PTI members. You can enter only the minimum amount of information (name and contact information) to your PTI profile and you can edit your profile at any time. For PTI members, additional information is required (details below in the Membership section). Some personal information is necessary so that the PTI can supply you with the services you have purchased or requested, and to authenticate you so that we know it is you and not someone else. You may manage your PTI subscriptions and you may opt-out of receiving certain communications at any time.

PTI may ask for a password, secret answers to certain security questions or other information that will allow us to identify a guest's account or provide a guest with access to their account or certain Online Services. Because many of our products and services are designed for educational use, some of the personal or contact information that we request may be about institutions and schools instead of, or in addition to, information about the guests themselves. When we use or associate other information with information that could be used to identify or contact a guest specifically, this other information is considered personal information for purposes of this Privacy Policy.

In order to ensure that users are provided with accurate information about their accounts, and content geared to the interest of that user, we may ask for personal information when a user registers for, logs on to, or visits our websites or other Online Services, or participates in activities on our websites.

We may request a user's personal information when they:

- Log on to one of our websites or Online Services
- Place an order on one of our websites for products or services (such as, but not limited to registration for events);
- Register or create an account on any of our websites;
- Send us an email or otherwise contact us using the online tools that we have provided on any of our websites, including for example "Contact Us" features;
- Submit customer ratings or reviews, testimonials, product ideas or ideas for the classroom or other education experience;
- Sign up for one of our newsletters, or request information, marketing materials or other communications;
- Participate in any social or community areas, including for example blogs and forums; and/or
- Enter any of our contests or promotions.

As noted above, our websites and Online Services also collect some usage information automatically. Please see below for more information.

We sometimes supplement the information that we collect as outlined in this Privacy Policy with information that we receive from other sources and entities. Such outside information includes, but is not limited to, updated delivery, billing, and address information, and information about products and services utilized, from carrier services or other third parties such as publishers, event organizers, and others who offer products or services to us and our users.

#### 1. Membership

When you become an PTI member, we collect information about you including (but not limited to) your name, email, mailing address, phone number, designation, place of work, and primary professional focus. Members may edit their profile at any time to change, add, or make private personal information.

We process your personal information for membership services, to deliver member benefits to you, and to inform you of PTI-related events, content, and other benefits or opportunities associated with your PTI membership. PTI may also use this information to help the PTI understand its members' needs and interests to provide products and services to meet its members' needs.

### 2. Workshops, Events, Meetings, and Conferences

The PTI sponsors events including conferences, as well as workshops, courses, and webinar, (collectively "events"). If you register for one of our events and you are a member, PTI uses the information in your member account to provide you with information and services associated with the event. If you are not a member and you register for one of our events, we will collect your name and contact information and use it to provide you with information and services associated with the event.

PTI also collects information from presenters and lecturers at its events, including name, employer and contact information, and photograph. PTI may also collect voluntarily-provided evaluation information provided by event attendees. PTI may also make and store a recording of the event in certain instances.

PTI may keep a record of an individual's participation in PTI events as an attendee or presenter, which may be used to provide membership services (such as, for example, to tell you about other events and publications). It may also be used to help the PTI understand its members' needs and interests to better tailor our products and services to meet those needs.

If an event is sponsored in whole or in part by an entity other than PTI, PTI may provide an attendee list to sponsors, co-sponsors and exhibitors. PTI may also allow sponsors, co-sponsors and/or exhibitors to send you material by mail/e-mail once per sponsored event, in which case the PTI will share your mailing address directly with the sponsor/exhibitor.

# 3. Publications

PTI offers publications for its members and the general public. PTI may provide a link to another organization's website which may contain content that is relevant and useful. To access this content, you will leave the PTI website, and PTI is not responsible or liable for content provided by these third party websites or personal information they may collect from you.

You may subscribe to some of PTI's publications without becoming a member. For example, you may sign up to receive the PTI's eNewsletter by providing us with at least your first name and last name, an email address, and the country in which you live. PTI does not share this information with any third party other than to provide you with the eNewsletters and other communications from PTI which PTI believes may be of interest.

# 4. Your Communications with PTI

If you correspond with us by email, the postal service, or other form of communication, we may retain such correspondence and the information contained in it and use it to respond to your inquiry; to notify you of PTI conferences, publications, or other services; or to keep a record of your complaint, accommodation request, and the like. If you wish to modify your communication preferences, please contact us at pti@powertoolinstitute.com. If you ask PTI not to contact you by email at a certain email address, PTI will retain a copy of that email address on its "do not send" list in order to comply with your no-contact request.

While using some of our products or services, you may have the opportunity to provide materials that may contain information that would enable identification of the user. Similarly, some of our Online Services may offer online social, community or other communication features that allow users to post, or share with others, messages, stories, pictures, videos, testimonials, lesson plans, or other content. Along with such content, users also may be given the opportunity to post certain personal information about themselves and other miscellaneous information related to the content.

Please note that although PTI may take various steps to protect users, we cannot guarantee that content posted by a user will not be seen by someone other than the audience intended by the user. By choosing to post items or use any of our social or communication features, users acknowledge that they do so at their own risk and agree that they will only share information and images which they have a legal right to share. PTI cannot take any responsibility for such information collected or disclosed in such postings.

Users also are encouraged to review the privacy statements of any other websites visited via hyperlinks posted on our Website to understand how those websites collect, use and share information. PTI is not responsible for the privacy policies or other content of third-party websites accessed through any PTI website.

# 5. Payment Card Information

You may choose to purchase goods or services from the PTI using a payment card. Typically, payment card information is provided directly by you, via the PTI website, into the PCI/DSS-compliant payment processing service to which the PTI subscribes, and PTI does not, itself, process or store the card information.

# 6. Personal information we get from third parties

PTI may receive personal information about individuals from third parties. For example, we may receive personal information from your employer if it signs you up for membership.

# 7. Your Use of the PTI Website

PTI's website automatically collects certain information and stores it. The information may include internet protocol (IP) addresses, the region or general location where your computer or device is accessing the internet, browser type, user's computer hardware and software, and operating system, the type of Online Service being used (including the product ID or serial number and product license information) and other usage information about the use of PTI's website, including a history of the pages you view. We use this information to help us design our Website to better suit our users' needs.

We also may collect general information about how, and how often, users use, browse, or view content on our websites, which products they buy and how users use and interact with our Online Services. This information, as well as information regarding access times and referring website addresses helps us maintain the quality of our services and gather general statistics about our Website users. In most cases, the usage information described above does not identify users personally, but in some cases may be linked to personal information such as an email address. Depending on which of our websites or the type of Online Service being used, and the specific type of usage information being collected, some or all of such information may be linked to the user's account.

Additionally, if a user receives our emails in HTML format, we may use technological methods to improve our services and communications to the user by, for example, determining whether that user has opened or forwarded our emails and/or clicked on links in those emails or to determine whether the user has made an inquiry or purchase in response to a particular email. These technological methods may enable us to collect and use information in a form that is personally identifiable. Users who do not want such information collected from HTML emails can request a change in the format of future emails by contacting us directly at pti@powertoolinstitute.com.

We may also use your IP address to help diagnose problems with our server and to administer our Website, analyze trends, track visitor movements, and gather broad demographic information that assists us in identifying visitor preferences. PTI's Website also use cookies and web beacons (see below). It does not track users when they cross to third party websites, does not provide targeted advertising to them, and therefore does not respond to Do Not Track (DNT) signals.

### 8. Cookies, web beacons and do not track

Cookies are pieces of data that a website transfers to a user's hard drive for record-keeping purposes. Web beacons are transparent pixel images that are used in collecting information about website usage, e-mail response and tracking. PTI's Website uses cookies and Web beacons to provide enhanced functionality on the site (e.g., user ID and password prompts) and aggregate traffic data (e.g., what pages are the most popular). These cookies may be delivered in a first-party or third-party context. PTI may also use cookies and web beacons in association with emails delivered by PTI. PTI's Website also captures limited information (user-agent, HTTP referrer, last URL requested by the user, client-side and server-side clickstream) about visits to our Website; we may use this information to analyze general traffic patterns and to perform routine system maintenance. You have choices with regards to the management of cookies on your computer. To learn more about your ability to manage cookies and web beacons, please consult the privacy features in your browser.

The PTI Website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google") to track how often individuals access or read PTI content. Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. We use this information in the aggregate to understand what content our members find useful or interesting, so we can produce the most valuable content to meet your needs. Google will use this information for the purposes of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using the PTI Website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

PTI tracks users when they cross from our primary public website (www.powertoolinstitute.com) to our PTI membership portion of the Website by logging in with their user name and password, as well as when visitors to our website enter through a marketing landing page. The PTI does not track its users when they cross to third party websites, does not provide targeted advertising to them, and therefore does not respond to Do Not Track (DNT) signals.

#### 9. Use and Processing of Personal Data

PTI processes your personal data to provide you with the goods or services you have requested or purchased from us, including membership services, events, publications and other content. We use this information to refine our goods and services to better tailor them to your needs and to communicate with you about other services PTI offers that may be relevant to you.

Personal Data submitted to PTI by you will be used for the purposes specified in this Privacy Policy or on the relevant pages of the PTI Website or collection point. PTI may use your Personal Data to:

- 1. administer the Websites (e.g. your membership profile);
- 2. personalize the Websites for you;
- 3. verify your identity when placing an order, logging into an account, or to prevent unauthorized access to or use of a user's account information;
- 4. enable your use of the services available on the Website;
- 5. supply you services purchased through the Website;
- 6. send statements, invoices and payment reminders to you, and collect payments from you;
- 7. send to you non-marketing commercial communications;
- 8. send to you email notifications that you have specifically requested;
- 9. send to you our email newsletters in respect of the e-Privacy-Regulation respectively in case you have accepted such service, (you can inform us at any time if you want to unsubscribe from the newsletters);
- 10. deal with inquiries and complaints made by or about you relating to the Websites;
- 11. keep the Website secure and prevent fraud;
- 12. identify ways that we can improve products and services to meet the needs of our users;
- 13. verify compliance with the terms and conditions governing the use of the Website.

If you submit Personal Data for publication on the Website, PTI will publish and otherwise use that information in accordance with the rights granted to PTI under this Privacy Policy.

PTI may use your personal information in the performance of any contract we enter into with you, to comply with legal obligations, or where PTI has a legitimate business interest in using your information to enhance the services and products we provide. Legitimate business purposes include but are not limited to one or all of the following: providing direct marketing and assessing the effectiveness of promotions and advertising; modifying, improving or personalizing our services, products and communications; detecting fraud; investigating suspicious activity and otherwise keeping our Website safe and secure; and conducting data analytics.

In addition, we may use your information in the following ways (after obtaining your consent, if required):

- To provide you with information about products and services that you request from us;
- To send you periodic communications;
- To provide you with information about other products, events and services we offer that are either (i) similar to those you have already purchased or inquired about, or (ii) entirely new products, events and services;
- For internal business and research purposes to help enhance, evaluate, develop, and create PTI website (including usage statistics, such as "page views" on PTI's Website and the products therein), products, and services;
- To notify you about changes or updates to our Website, products, or services;
- To administer our services and for internal operations, including troubleshooting, data analysis, testing, statistical, and survey purposes;
- To allow you to participate in interactive features of our service; and
- For any other purpose that we may notify you of from time to time.

# 10. Lawful Bases

Under certain laws, we are required to rely on one or more lawful grounds to collect and use the personal information that we have outlined above. We consider the grounds listed below to be relevant:

### a. Legal obligation

Where the processing of your personal information is necessary for us to comply with a legal obligation to which we are subject e.g. because we have to provide information to tax authorities.

### b. Contractual relationship

Where it is necessary for us to use your personal information in order to perform a contract to which you are a party (or to take steps at your request prior to entering a contract).

# c. Legitimate interests

We rely on this basis where applicable law allows us to collect and use personal information for our legitimate interests and the use of your personal information is fair, balanced and does not unduly impact your rights. For instance, it is in our legitimate interest to use personal information about our members to provide membership services.

When we process your personal information to achieve such legitimate interests, we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. We will not use your personal information for activities where our interests are overridden by the impact on you, for example where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

### d. Consent

We may obtain your consent to use your personal information in certain circumstances e.g. to send you email marketing. We will ensure that when we obtain your consent you are free both to give it and to decline to give it. Additionally, you may always withdraw your consent at any time without any further detriment to you.

### 11. When and How We Share Information with Others

Information about your PTI purchases and membership are maintained in association with your membership or profile account. The personal information PTI collects from you is stored in one or more databases hosted by third parties located in the United States. These third parties do not use or have access to your personal information for any purpose other than database storage and retrieval. PTI may also engage third parties to send information to you, including items like publications you may have purchased, or material from an event sponsor.

PTI does not otherwise disclose or otherwise transfer your personal data to third-parties for their independent use unless: (1) you consent or authorize it; (2) it is necessary for the performance of the contract you have signed with us; (3) it is in connection with PTI-hosted or PTI co-sponsored conferences as described above; (4) the information is provided to comply with the law (for example, to comply with a search warrant, subpoena or court order, or for tax obligations), enforce an agreement we have with you, or to protect our rights, property or safety, or the rights, property or safety of our employees or others; (5) the information is provided to our agents, vendors or service providers who perform functions on our behalf; (6) to address emergencies or acts of God; or (6) to address disputes, claims, or to persons demonstrating legal authority to act on your behalf; and (7) through the PTI Member Directory. We may also gather aggregated data about our members and Website visitors and disclose the results of such aggregated (but not personally identifiable) information to our partners, service providers, advertisers and/or other third parties for marketing or promotional purposes.

Please note that when we disclose or transfer your personal data to third-parties to provide limited services on our behalf, such as publishing and/or sending newsletters, operating our meetings, fulfilling and shipping orders that users have placed and completing transactions requested by users, we provide those companies with the information that they need to provide us with the specific task they have been hired to do, and we prohibit them from using that information for any other purpose, and we require them to abide by strict information privacy standards.

The PTI Website may interface with social media sites such as Facebook, LinkedIn, Twitter, Instagram and others. If you choose to "like" or share information from the PTI Website through these services, you should review the privacy policy of that service. If you are a member of a social media site, the interfaces may allow the social media site to connect your site visit to your personal data.

If you participate in meetings or other events, PTI may use and publish your Personal Data, photos and video impressions taken during the events and/or meetings for PTI's purposes.

PTI will not, without your express consent, supply your Personal Data to any third party for marketing purposes, whether directly or indirectly.

The PTI makes member information available through the PTI Member Directory to other PTI members using the Website. Members may choose whether to keep their personal data private by logging into their account and changing their preferences.

### 12. Personal Data Transfer to the United States

PTI has its headquarters in the United States. Information we collect from you will be processed in the United States. The United States has not sought nor received a finding of "adequacy" from the European Union under Article 45 of the GDPR. PTI relies on derogations for specific situations as set forth in Article 49 of the General Data Protection Regulation ("GDPR"). In particular, PTI collects and transfers to the U.S. personal data only: with your consent; to perform a contract with you; or to fulfill a compelling legitimate interest of PTI in a manner that does not outweigh your rights and freedoms. PTI also minimizes the risk to your rights and freedoms by not collecting or storing sensitive personal information about you. Where we collect personal information within the European Economic Area (EEA), we have taken steps to ensure that the personal information is handled in compliance with European data protection and privacy legislation.

If you are located in the EEA, you should be aware that your personal information will be transferred to the US. In such cases, where your personal information is transferred from the EEA to the US, we will take all reasonable steps necessary to ensure that appropriate safeguards designed to protect your personal information are implemented.

# 13. Data Retention

Your personal data is stored on the servers of the cloud-based database management services the PTI engages. PTI retains data for the duration of the customer's or member's business relationship with PTI. PTI may retain all information you submit for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where PTI otherwise reasonably believes it has a legitimate reason to do so. In some cases, PTI may choose to retain certain information in a depersonalized or aggregated form. For more information on where and how long your personal data is stored, and for more information on your rights of erasure and portability, please contact the PTI at pti@powertoolinstitute.com.

# 14. Your Choices and Rights

Where processing is based on consent, you shall have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

If you no longer wish to receive communications from us, you can let us know by sending us an email at pti@powertoolinstitute.com. The communications we send you may contain opt-out mechanisms that allow you to change your preferences. All users registered with one of our websites can log into their account and access or update the contact information currently associated with that account, including for example a mailing address or email address. Users also may be able to use our websites to view and update information regarding recent orders, payment settings (such as credit card information), email notification settings and prior order history. If a password has been forgotten, a user also can find instructions for resetting it on the account information page.

With respect to communications preferences, a user can unsubscribe from newsletters by following the instructions included in any newsletter received. A user whose email address has changed and would like to continue to receive newsletters, will need to access the account and update the email address information and might need to sign-up again for the newsletter. Occasionally, we will send out emails concerning website disruptions, new products and other news about our products and services. These emails are sent to all account holders and are not subscription-based. Such emails are considered a part of our service to the users of our websites. A user can opt-out of these communications by following the opt-out instructions at the end of the email.

Subject to local law (for example, the European Union's General Data Protection Regulation provides certain rights for data subjects), you may have certain rights regarding information that we have collected and that is related to you. We encourage you to contact us to update or correct your information if it changes or if you believe that any information that we have collected about you is inaccurate. You can also ask us to see what personal information we hold about you, to erase your personal information and you may tell us if you object to our use of your personal information. In some jurisdictions, you may have a right to complain to your local data protection authority. If you would like to discuss or exercise the rights you may have, send us an email via pti@powertoolinstitute.com.

You may also request information about: the purpose of the processing; the categories of personal data concerned; who else outside PTI might have received the data from PTI; what the source of the information was (if you didn't provide it directly to PTI); and how long it will be stored. You have a right to correct/rectify the record of your personal data maintained by PTI if it is inaccurate. You may request that PTI erase that data or cease processing it, subject to certain exceptions. You may also request that PTI cease using your data for direct marketing purposes. In some countries, you have a right to lodge a complaint with the appropriate data protection authority if you have concerns about how PTI processes your personal data. If required by law, PTI will, at your request, provide your personal data to you or transmit it directly to another controller.

Reasonable access to your personal data will be provided at no cost to PTI members, conference attendees and others upon request made to PTI at pti@powertoolinstitute.com. If access cannot be provided within a reasonable time frame, PTI will provide you with a date when the information will be provided. If for some reason access is denied, PTI will provide an explanation as to why access has been denied.

#### **15. Security of your Information**

PTI maintains physical, technical and administrative safeguards to help protect the privacy of data and personally identifiable information transmitted to PTI. PTI updates and test its security technology on a periodic basis. We restrict access to your personal data to those employees who need to know that information to provide benefits or services to you. We train our employees about the importance of confidentiality and maintaining the privacy and security of your information. We commit to taking appropriate disciplinary measures to enforce our employees' privacy responsibilities.

Any user who chooses to register with any PTI website or an Online Service will be required to create a password. This password can be changed by the user at any time by first logging into the service by using the current password and then setting a new one. It is the user's responsibility to keep the password confidential. A user who has logged in from a computer that is shared with others should always log out of the website before leaving it to prevent subsequent users of that computer from accessing information under their log in. A user who believes that someone has used their password or account without their permission, or has a reason to believe there might have been a breach of security, should notify us immediately to reset their password.

### 16. Changes and Updates to This Privacy Policy

As our organization, membership and benefits change from time to time, this Privacy Policy is expected to change as well. We reserve the right to amend the Privacy Policy at any time, for any reason, without notice to you, other than the posting of the amended Privacy Policy at this Website. You should check our Website frequently to see the current Privacy Policy that is in effect and any changes that may have been made to it. PTI will notify you by additional means where possible, such as posting a notice on the Website or sending you an email, or some other prominent mechanism, when material and significant changes are made. The provisions contained herein supersede all previous notices or statements regarding our privacy practices and the terms and conditions that govern the use of this Website.

### **Questions or Comments About this Privacy Policy?**

If you have any questions, feedback, or complaints about our Privacy Policy, please call us, send an email or write to us at:

PTI 1300 Sumner Avenue Cleveland, Ohio 44115 Email: pti@powertoolinstitute.com