

Plus Company Privacy Policy

Last Updated: [date]

Plus Company Americas Inc. (referred to here as “Plus Company” or “we” or “us”) values our customers and respects your privacy.

This Privacy Policy (“Policy”) applies to our offline and online data collection practices, including when you visit our website at <https://www.pluscompany.com> and any website owned, operated, or controlled by us (collectively the “Site”), contact us by phone or email, or when you engage with us on social media.

We may update this Policy from time to time, as specified in the “Changes to This Privacy Policy” section below.

California state law confers certain rights relating to personal information to its residents. If you are a California resident, please also see our California Privacy Rights Act Notice located at: [\[Link to CA Notice\]](#).

Your Consent

You should read this entire Policy before submitting information to us or using our Site. Whenever you submit personal information to us, you consent to the collection, use, disclosure, transfer and storage of that information in accordance with this Policy. We may make full use of all information that is de-identified, aggregated, or otherwise not in personally identifiable form.

Information Collection and Use

We collect personal information using three methods: 1) from you when you choose to voluntarily provide it; 2) using automated technology, including when you visit our Site or communicate with us through email; and 3) through third party sources including but not limited to service providers, entities providing data analysis and analytics, social media and social networking websites and other entities.

All personal information will be used as stated in this Policy. We will retain your personal information for the period necessary to fulfill the purposes outlined in this Policy and as otherwise needed to comply with applicable law and internal company policies.

We may combine data collected from these disparate sources unless we tell you otherwise.

We collect, use, and disclose your personal information as described in the chart in **Annex 1** below [\[Link to Annex 1\]](#).

Retention of Data

We will retain your personal information (collected through offline and online methods) for as long as it is necessary for the purposes described in this Policy. We will also retain and use your

personal information to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our legal agreements and policies.

Intended Audience of Site; COPPA Compliance

We are in compliance with the requirements of the Children’s Online Privacy Protection Act (“COPPA”) and other applicable privacy laws. Our Site, social media accounts and online activities are not directed to children under the age of 16. As a result, our Site does not request or knowingly collect personal data from individuals under the age of 16. If you are not 17 or older, you should not visit or use our Site.

Security

We take reasonable appropriate steps to protect personal data from loss, misuse and unauthorized access, disclosure, alteration or destruction, whether in transmission or storage. Please keep in mind, however, that there is no such thing as perfect security, and no Internet transmission is ever completely secure or error-free.

We offer the use of a secure server. All supplied sensitive/credit information is transmitted via Secure Socket Layer (SSL) technology hosted by a third party and then encrypted into our payment gateway provider’s database only to be accessible by those authorized with special access rights to such systems, and who are required to keep the information confidential.

Cookies and other automated technology

A “cookie” is a small text file that is placed onto an Internet user’s web browser or device and is used to remember and/or obtain information about the user. A “web beacon” is a small object or image that is embedded into a web page, application, or email and is used to track activity. They are also sometimes referred to as pixels and tags.

To find more information about cookies and for instructions on how to disable them, please visit www.allaboutcookies.org or visit the help section of your browser. Most browsers are initially set to allow cookies, but also offer the option to restrict cookies or warn you of their use. By disabling cookies, you won’t be able to enjoy the convenience provided by our customization.

Analytics Disclaimer

We and/or third parties including our service providers on our behalf, may use cookies, web beacons and other similar technology, to collect information for the purposes described in this privacy statement including analytics, and monitoring performance and improvement of our Site (traffic, errors, page load time, popular pages, etc.)

We use Google Analytics to understand how our Site, services, and products perform and how you use them. To learn more about how Google processes your data, please visit <https://www.google.com/policies/privacy/>. To opt out of Google Analytics please visit <https://tools.google.com/dlpage/gaoptout>.

Contact for More Information

For information and questions about the use of your personal information or this Policy, you may contact us at privacy@pluscompany.com.

Changes to This Privacy Policy

This Policy may be revised from time to time for any reason. If this Policy changes, the revised policy will include a new effective date, and we will notify you of such changes by posting the revised policy on this page. Be sure to check the Policy whenever you submit personal information or use our Site, services, or engage with our social media accounts.

CALIFORNIA CONSUMERS ONLY: Your California Privacy Rights

This Privacy Rights Act Notice (“Notice”) provides additional information to California residents whose Personal Information is collected by us pursuant to California law, including the California Consumer Privacy Act (“CCPA”), as amended by the California Privacy Rights Act (“CPRA”). If you are not a California resident, this Notice does not apply to you.

Right to Know About Personal Information Collected, Disclosed, or Sold and Shared

Information Collected

Within the past 12 months, we have collected the categories of personal information about California consumers as described in Annex 1 [\[LINK\]](#) to this Notice.

Business-to-Business (“B2B”) Information

If you are a contact person for any of our business partners, vendors, distributors, suppliers, service providers, contractors, or other entities with which we have a business relationship or potential business relationship, you have the same rights as other consumers set forth in this Notice with respect to the information we collect from you in that role. We collect the contact information you provide to us, including name, phone number, address, email address and other contact and relationship information and communications consistent with your role in facilitating that business relationship. We use that information for internal purposes, including to contact you, send and receive information, and otherwise facilitate the business relationship. We do not disclose that information outside our business relationship without your consent. For more details see Annex 1 [\[Link\]](#).

Information Sold or Shared

We have not sold or shared any personal information to third parties for a business or commercial purpose in the preceding 12 months.

We have disclosed the following category of personal information to third parties for a business or commercial purpose in the preceding 12 months:

- Internet/Network Activity.

For details regarding categories of third parties with whom we have disclosed this information, please see Annex 1 [\[LINK\]](#).

We do not sell the personal information of minors under 16 years of age.

Requests to Know

You have the right to request that we disclose personal information we collect about you.

To make a request for any of the information set forth above (a “Request to Know”), please submit a verifiable consumer request pursuant to the instructions below. You may only make a Request to Know twice within a 12-month period. We will acknowledge your Request to Know within 10 days and will attempt to respond substantively within 45-90 days.

The Request to Know must provide sufficient information to allow us to verify that you are the person about whom the personal information was collected, sold or disclosed and must contain sufficient detail to allow us to properly understand, evaluate and respond to your request. If we cannot verify your identity, we will not be able to respond to your request.

You can make a Request to Know the personal information we have about you in the following ways:

- Enter your request here [[insert webform hyperlink](#)].
- You may also email us at: privacy@pluscompany.com.
- You may also make a request by phone by contacting us at [[toll-free phone number](#)].

Once we receive your Request to Know, we will begin the process to verify that you are the person that is the subject of the request (the “Verification Process”). The Verification Process consists of matching identifying information provided by you with the information we have about you in our records. If you are an account holder, making a request through your account is sufficient for verification purposes. If you do not have an account with us, you will be asked to provide us with two or three pieces of information that will help us to verify your identification.

Right to Know and Limit Use of Sensitive Personal Information Collected

We do not collect or process sensitive personal information for purposes of inferring characteristics or for any purposes other than those set forth in Regulations Section 7027(m).

Right to Request Deletion of Personal Information

You have the right to request the deletion of your personal information collected or maintained by us (“Request to Delete”), subject to certain exceptions permitted by law.

To make a Request to Delete, please submit a verifiable consumer request pursuant to the instructions below. We will acknowledge your Request to Delete within 10 days and will attempt to respond substantively within 45-90 days.

The Request to Delete must provide sufficient information to allow us to verify that you are the person about whom the personal information was collected, sold or disclosed and must contain sufficient detail to allow us to properly understand, evaluate and respond to your request. If we cannot verify your identity, we will not be able to respond to your request. Additionally, as permitted by law, if the information requested to be deleted is necessary for us to maintain, we will not be able to comply with your request. We will notify you if this is the case.

You can make a Request to Delete in the following ways:

- Enter your request here [[insert webform hyperlink](#)].
- You may also email us at: privacy@pluscompany.com.
- You may also make a request by phone by contacting us at [[toll-free phone number](#)].

Once we receive your initial request to delete and your separate confirmation to delete, we will need to verify that you are the person that is the subject of the request (the “Verification Process”). The Verification Process consists of matching identifying information provided by you with the information we have about you in our records.

We will retain correspondence, documents and information related to any Request to Know, Request to Delete, or Request to Opt-Out for 24 months as required by law.

Right to Opt-Out of Sale or Sharing of Personal Information

You have the right to opt-out of the sale or sharing of your personal information. We do not sell or share your personal information.

Cookies

You can opt out of cookies using your browser. Additionally, you may also exercise your right to opt-out of cookies and automated technology used by us and third party partners using the opt-out methods identified in the “Cookies and other automated technology” section of our Privacy Policy [[link](#)].

Please Note:

- Opt-outs are device and browser based. You must opt out on each device and each browser where you want your choice to apply.
- Opt-outs maybe stored via cookies. If you clear cookies, your opt-out may no longer be valid and you must opt out again where you want your choices to apply.
- We may still share your information with our service providers that help us perform functions that are necessary for our business such as vendors that host our website, credit card processors, analytics processors. These entities are contractually obligated to keep this information confidential and not use it for any purpose other than for the services they provide to our business.
- You may still receive ads from us that are not tailored to your interests.

Right to Correct

You have the right to request that we rectify inaccurate information about you.

To make a Request to Correct, please submit a verifiable consumer request pursuant to the instructions below. We will acknowledge your Request to Correct within 10 business days and we will attempt to respond substantively within 45-90 days.

You can make a Request to Correct in the following ways:

- Enter your request here [[insert webform hyperlink](#)].
- You may also email us at: privacy@pluscompany.com.
- You may also make a request by phone by contacting us at [[toll-free phone number](#)].

Once we receive your request to correct, we will need to verify that you are the person that is the subject of the request through the Verification Process.

We will review all information provided by you to us, to determine whether the information is inaccurate. We reserve the right to delete the information instead of correcting if such deletion does not impact you or you consent to the deletion.

We will inform you of our decision to deny or grant your request.

We will retain correspondence, documents and information related to any Request to Correct for 24 months as required by law.

Right to Non-Discrimination For Exercising Consumer Privacy Rights

You have the right not to receive discriminatory treatment for exercising your privacy rights conferred by the California Consumer Privacy Act, including by exercising the rights specified herein.

Right to Access Information About Automated Decision Making and the Right to Opt-Out of Automated Decision Making

You can request access to information about automated decision making processes. Plus Company does not engage in automated decision making processes. To inquire about automated decision making, please email us at privacy@pluscompany.com.

Retention of Personal Information

We will retain your personal information for as long as it is necessary for the purposes set out in Annex 1 [\[LINK\]](#) and to the extent necessary to comply with our legal obligations (for example, if we are required to retain your personal information to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Authorized Agent Information

You may designate an authorized agent to make a request on your behalf under the California Consumer Privacy Act.

Authorized agents may make requests under the California Consumer Privacy Act on behalf of consumers by emailing privacy@pluscompany.com. We will require authorized agents to provide proof of the consumer's consent to and designation of the authorized agent for purpose of making the request, and will require authorized agents to provide information necessary to verify the identity of the consumer who is the subject of the request. We may also require that a consumer verify his or her own identity directly with us before we respond to an authorized agent's request.

California Do Not Track Notice

Because there are not yet common, industry accepted "do not track" standards and systems, our Site does not respond to Do Not Track signals. In addition, we may allow third parties to collect personal information from your activity on our Site, as described in the "Information Collection and Use" section above and described in Annex 1.

California Shine The Light Disclosure Information

Although we do not disclose to any third-parties for their marketing purposes any personal information, California residents are entitled to receive the following disclosure information under California law:

Under California Law, California residents have the right to request in writing from businesses with which they have an established business relationship, (1) a list of the categories of personal information, such as name, address, email address, and the type of services provided to the

customer, that a business has disclosed to third-parties (including affiliates that are separate legal entities) during the immediately preceding calendar year for the third-parties' direct marketing purposes, and (2) the names and addresses of all such third-parties. We will respond to such written requests within 30 days following receipt at the email or mailing address specified below under "Contact Us". If we receive your request at a different email or mailing address, we will respond within a reasonable period of time, but not to exceed 150 days from the date received. Please note that we are required to respond to each customer only once per calendar year.

Changes to This Privacy Policy

This Policy may be revised from time to time for any reason. If this Policy changes, the revised policy will include a new effective date, and we will notify you of such changes by posting the revised policy on this page. Be sure to check the Policy whenever you submit personal data or use our Site, communicate with us via email or engage with our social media accounts. The effective date of this Privacy Policy is [REDACTED], 2023.

Contact For More Information

For information and questions about the use of your personal information or this California Consumer Privacy Section or your rights under California law, you may contact us at privacy@pluscompany.com.

ANNEX 1
Notice of Collection, Use, and Disclosure

See full Privacy Policy here [[link to Privacy Policy](#)]

See California Privacy Rights here [[Link to California Consumer Notice](#)]

Category of Information Collected	Examples	Collected From	Purposes	Disclosed to	Sold or Shared	Retention Period
Internet/Network Activity	IP address, your device information, domain name, geolocation, browsers you used to access our Site, webpages viewed, time spent on webpages, links clicks, transactions entered into and site-navigation patterns	Your computer or mobile device, through your online activities and interactions with us, including, without limitation, your online activity on our Site, and on our social media channels or through our third-party sources. Third-party sources such as Google, publicly available data, other companies and referrals.	To better understand how you use our Site; to enhance, modify, or improve our Site, services, and general business; for other marketing, research, legal, and other business purposes; to comply with our policies, procedures, and legal obligations, including complying with law enforcement or governmental authority requests, investigating fraudulent activity, resolving disputes, and enforcing our legal agreements and policies.	Consultants, service providers, and contractors that we use to support our business and operations (e.g. hosting or operating our Site and services, data collection, reporting, Site metrics and analytics, data analysis, fraud detection services) who have agreed to keep the information confidential and use it only to provide the applicable services; Third parties (including, without limitation, governmental agencies) if required to do so by law, regulation or court order; to respond to governmental and/or law enforcement requests; An acquirer or successor-in interest in the event of a reorganization, merger, sale, change of control, consolidation, joint venture, assignment, transfer or other disposition of all or any part of Plus Company or its affiliates including any negotiation thereof.	No	We will retain your Personal Information for as long as it is necessary and to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our legal agreements and policies.
Business-to-Business (“B2B”) Information	Name, phone number, address, email address and other contact	You, if you are a contact person for any of our business partners, vendors, distributors,	For internal purposes, including to contact you, send and receive information, and	We do not disclose B2B Information outside our business relationship without your consent.	No	We will retain your B2B Information for as long as it is necessary to fulfill the purposes outlined in this Policy and as otherwise

	and relationship information consistent with your role in facilitating the business relationship.	suppliers, service providers, contractors, or other entities with which we have a business relationship or potential business relationship.	otherwise facilitate the business relationship.			needed to comply with applicable law and internal company policies.
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