

PRIVACY POLICY

EDW C LEVY CO PRIVACY NOTICE AND COOKIE POLICY

Last updated February 24, 2020

WHO WE ARE

Edw C Levy Co (“we” or “us”) is a ‘data controller’ for the purposes of the laws of the State of California and, the European Union and its member states (the “General Data Protection Regulation”) and other jurisdictions and we are responsible for, and control the processing of, personal information which we hold about you. Your personal data will be collected, processed and used by us only in compliance with the applicable data protection laws. This Privacy Notice (the “Privacy Notice”) relates to Edw C Levy Co and can be found at edwclevy.com. We may make changes from time to time and will notify you about these changes accordingly. We take your privacy very seriously and we ask that you read this Privacy Notice carefully as it contains important information on:

- the personal information we collect about you as a visitor to the website,
- what we do with your information to action your request,
- who your information might be shared with, and
- your rights.

WHAT INFORMATION DO WE COLLECT AND WHY?

On our website, you might complete our contact form or sign up to access our iSupplier portal. We will need your name and email address to enable us to respond to your question or to register you for the portal, where we also ask for your company information. We process personal information that you provide to us when you contact us or interact with us on social media for communication purposes only. If you are just browsing our website, we will not collect personal data, unless you consent to a cookie being set. If you accept cookies, we will collect your IP address for the purposes set out in the Cookie Policy, such purpose might be, depending on the cookie, to track your usage of the website or recognize you if you return. Please see our Cookie Policy for more information.

Personal information about other individuals

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on their behalf and has agreed that you can provide the information. Furthermore, you confirm, that you informed the other person about the content of this Privacy Notice, by providing them with a current version of it.

Information collected on the website

We collect information about usage of our website by all visitors. This information is statistical and aggregated and does not identify you. We collect this information so that we can:

tailor and personalize user experience and

monitor our website usage to improve our site.

Use of Cookies

Our websites use cookies to distinguish you from other users of our website. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive. These cookies help us to provide you with a good experience when you browse our websites and also allow us to improve our sites. By continuing to browse the sites, or by submitting any forms on our sites, you are agreeing to our use of cookies. We use the following cookies:

- Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.
- Analytical/performance cookies. These allow us to recognize and count the number of visitors and to see how visitors move around our websites when they are using it. This helps us to improve the way our websites work, for example, by ensuring that users are finding what they are looking for easily.
- Functionality cookies. These are used to recognize you when you return to our website. This enables us to personalize our content for you.
- Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the information displayed on it more relevant. We may also share this information with third parties for this purpose.

Please note that third parties (providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies. You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

When is processing of your personal data legal?

We are allowed to process your personal data for example for the following reasons and on the following legal basis:

- Consent We collect, process and use your personal data for specific purposes if you have given your consent to the collection, processing and use of specific personal data for such purposes. You may withdraw your consent any time.
- Legitimate interest If processing is necessary for the purposes of our legitimate interests, except where such interest is overridden by your interest.
- Other legal grounds Your personal data may also be collected, processed and used without your consent, if the collection, processing, or use of the data:
 - is required due to legal obligations or orders by public authorities or courts,
 - is necessary to substantiate or protect legal claims or to defend against lawsuits, or
 - serves to prevent abuse or other illegal activities.

KEEPING YOUR DATA SECURE

We will use technical and organizational measures to safeguard your personal data, for example:

- access to your account is controlled by a password and user name that are unique to you;
- we store your personal data on secure servers; and
- we use Secure Socket Layer (SSL) technology to ensure secure connections on our website and that data on our website is encrypted. This means that we convert your data into a computer code, which will make it harder for hackers to access your data on our website.

While we will use all reasonable efforts to safeguard your personal data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data that are transferred from you or to you via the internet. If you have any particular concerns about your information, please contact us (please see the 'Contact us' section below).

Who will we share your information with?

Like any business, we use service providers to operate our services, for example such as website hosting, customer relationship databases and systems. Some of these service providers will process your data as part of the services they offer to us. We take steps to ensure that our service providers treat your data in accordance with the law, only use it in accordance with our contract with them and keep it secure.

Transfers of your information out of the EEA

Edw C Levy Co store data about www.edwclevy.com customers in the United States and we use these central systems for the processing of your data. Any transfer of your data will be carried out in accordance with the law, to safeguard your privacy rights and in the unlikely event of a security breach, give you remedies, or any other similar approved mechanisms. We will ensure that any transfer of your personal data to the United States is done on the basis of EU Model Clauses or on the basis of the Privacy Shield in order to achieve an adequate level of data protection.

How long will we keep your data for?

We will retain your personal data while we are providing our services to you and we will not retain your personal data for longer than is strictly necessary.

WHAT RIGHTS DO YOU HAVE?

As a data subject, you have the following legal rights:

- the right of access to personal data relating to you
- the right to correct any mistakes in your information
- the right to restrict or object to your personal data being processed
- the right to receive and/or have your personal data ported to another data controller
- the right to erasure
- the right to provide instructions regarding the processing of your personal data after your death
- the right to stop receiving marketing emails
- the right to prevent the sale of your personal data compensation for damage caused by contravention of the law

- the right to notify the Privacy Enforcement & Protection Unit at the California Attorney General's Office or your local privacy enforcement body if you believe we have not handled your personal data in accordance with the laws.

Some of these rights are explained in more detail below, but if you have any comments, concerns or complaints about our use of your personal data, please contact us (please see the 'Contact us' section at the bottom, below).

1. Right to access to personal data relating to you

You may ask to see what personal data we hold about you and be provided with:

- a copy;
- details of the purpose for which it is being or is to be processed;
- details of the recipients or classes of recipients to whom it is or may be disclosed, including if they are overseas and what protections are used for those overseas transfers;
- the period for which it is held (or the criteria we use to determine how long it is held);
- any information available about the source of that data.

See the 'Contact us' for details of who to contact to make a request for your personal data. To help us find the information easily, please give us as much information as possible about the type of information you would like to see.

2. Right to correct any mistakes in your information

You can require us to correct any mistakes in your information, which we hold free of charge. If you would like to do this, please:

- email, call or write to us (see the 'Contact us' section below),
- let us have enough information to identify you, and
- let us know the information that is incorrect and how it should be corrected.

3. Right to restrict or prevent processing of personal data

You may request that we stop processing your personal data if:

- you do not think that your data is accurate. We will start processing again once we have confirmed that it is accurate;
- the processing is unlawful, but you do not want us to erase your data;
- we no longer need the personal data for our processing, but you need the data to establish, exercise or defend legal claims; or
- you have objected to processing because you believe that your interests should override our legitimate interests.

4. Right to ask us to stop contacting you with direct marketing

You can ask us to stop contacting you for direct marketing purposes at any time. If you would like to do this, please:

- click on the 'unsubscribe' button at the bottom of the email. It may take some additional amount of time for this to take place; or

- click on the link in the footer of any email you receive from Edw C Levy Co and use our preference center
- or;
- contact us (please see the 'Contact Us' section).

5. Right to Prevent Sale of Personal Information to Third Parties

You have the right to prohibit Edw. C Levy Co from selling your personal information to any third party. That being said, Edw. C Levy Co does not sell any personal information to any third party.

6. What will happen if your rights are breached?

If your statutory data subject rights of the applicable data privacy laws are violated you may be entitled to remedies, including monetary compensation under the applicable privacy laws.

7. Complaints

If you do not think that we have processed your data in accordance with this notice, please contact us in the first instance, at the details in the 'Contact us' section directly below. If you are not satisfied, you can complain to the California Attorney General's Office, or your local privacy enforcement body located in your jurisdiction. Information about how to do this is available on his website at www.oag.ca.gov.

Contact Us

Please contact us if you have any questions about this Privacy Notice or the information, we hold about you. Please call us at 313.429.2200.