Effective Date: 12/8/2020

Privacy Policy

We respect your privacy and are committed to protecting your personal data (see paragraph 4 below for details of what personal data means). This privacy policy will inform you about how we collect and look after your personal data when you visit our websites (regardless of where you visit it from), when you call us, or when you otherwise interact with us. This policy also tells you about your privacy rights.

Whenever we collect information about you, we make decisions about how or why we process that personal data. We are responsible for ensuring that your personal data is used in accordance with data protection laws, to the extent they apply, such as the General Data Protection Regulation (G DPR) in Europe, the California Consumer Privacy Act (CCPA) in the United States, the Brazilian General Data Protection Act (Law n.º 13,709/2018 "LGPD"), and other applicable global privacy regulations.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below Alternatively, you can download a PDF version of the policy here.

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1. The controller

To the extent the GDPR applies, and for other data privacy laws (such as the LGPD) with a data controller requirement, Klein Tools, Inc. and its affiliates are the data controller that directs the purposes for which your personal data is processed. (For users in Mexico and Brazil, please note that Klein Tools, Inc., rather than its Mexican and Brazilian affiliates, is the data controller of personal data collected through your use of this website). Note that ZAH Group, Inc. is Klein Tools' parent company.

For a list of affiliates, please click here, and for a list of websites covered by this policy, please click here.

2. Third-party links

Klein Tools websites may include links to third-party websites (including to those websites that allow you to purchase products or services bearing our various brands), plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control

third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy on every website you visit.

3. Changes to the privacy policy

We regularly review our privacy policy. Updated privacy policies will be made available through our websites. We will comply with applicable data privacy laws when making changes to our privacy practices. The date at the top of this privacy policy indicates the date when the policy was last updated and the updates went into effect.

4. The data we collect and process about you

"Personal data", (also referred to as "personal information" or "personally identifiable information" in some jurisdictions/regions), means any information from which a person is identifiable or from which that person can be identified. It does not include data where the person's identity has been removed (anonymous or deidentified data), unless it still possible to identify the person from that data in combination with other data held by the data controller.

In the context of this privacy policy, "**processing**" means any activity relating to personal data, including by way of example, collection, storage, use, consultation, disclosure, sharing and transmission.

Depending on which websites you use, and your activity on those websites, we may collect, use, store and transfer different kinds of personal data about you, which we have categorized as follows:

- Profile Data includes your name, username and password (for the relevant website), email
 address, mailing address, payment information, purchases or orders you make, your interests,
 preferences, and on-line or telephonic feedback and survey responses. (For our U.S. employees
 only (not any other data subjects) who browse and/or buy products/services from us as well, this
 may include your employee file number from a pay stub in combination with zip code and last four
 digits of your Social Security Number.)
- Technical Data (to the extent that this constitutes personal data under applicable privacy laws)
 includes your internet protocol (IP) address, browser type and language, Internet service provider
 or mobile carrier, referring and exit websites and applications, time zone setting, location, browser
 plug-in types and versions, operating system and platform, and other technology identifiers on the
 devices you have used to access this website.
- Usage Data includes information about how you use our website, products, and services.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for various purposes. Aggregated Data may be derived from your personal data but is not considered personal data by law, as it will **not** directly or indirectly reveal your identity. For example, we may aggregate Usage Data to calculate the percentage of users who are accessing a specific website feature. However, if we combine or connect the Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data, which will be used in accordance with this privacy policy.

In relation to our customers, and for the purposes set out in this privacy policy, we do not collect **Special Categories of Personal Data** (also referred to as "sensitive information" in some jurisdictions/regions) about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, information about your health, and genetic and biometric data), with the exception of trade union membership (or professional or trade association membership, to the extent that is categorized as Special Category Personal Data under applicable privacy laws) in particular circumstances. In those circumstances, we will seek your explicit consent.

5. How we collect your data

We use different methods to collect data from and about you, including through:

- **Data you enter.** If you order a product, engage in our discussion forums, complete a warranty card, enter contests, or sign up for reward points, we will collect that relevant information.
- Automated technologies or interactions. As you interact with our websites, we will automatically
 collect Technical Data about your equipment and software, and we log usage data, such as when
 you view or click on content, perform a search, share articles, or apply for jobs. As further
 described under "Cookies" below, we use cookies and similar technologies (e.g., web beacons,
 pixels, ad tags, and device identifiers) to recognize you and/or your device(s) on, off, and across
 different websites and devices.
- Third parties or publicly available sources. We may receive data about you from third-party retailers who sell our products, primarily to enable us to ship products you have ordered through the third-party to you, or to fulfill legal or regulatory obligations.

6. How we use your personal data

To the extent the GDPR or another relevant privacy law applies (such as the LGPD), we will only use your personal data when we have a lawful basis to do so. The table below describes all the ways we plan to use your personal data, and the legal bases we rely on to do so.

(Please note, If you are in Australia, we will only use or disclose your personal data for the primary purpose for which we collect it, for a related secondary purposes where it is reasonable for you to expect us to use or disclose it for this purpose, with your consent, or where otherwise permitted under applicable laws. The primary purpose for which we collect your personal data is set out in the table below, under the 'Why we collect it' column. Whereas, if you are in Mexico, and where the table below indicates that we rely on legitimate interests as a lawful basis for processing your data, we instead rely a different lawful basis: (i) consent; (ii) necessary for the performance of a contract or in order to take steps to enter into a contract; or (iii) necessary for us to comply with our legal obligations, as appropriate.)

Information we collect	Why we collect it	Lawful basis for the processing
If you place an order with us, we will collect the following Profile Data: your name, mailing and billing address, email address, telephone number, and payment information.	This information is necessary to provide you (or the company which you represent, where your order is on behalf a company) with the product you ordered, or to take steps at your request prior to providing you with the product.	Where you are contracting with us on your own behalf: necessary for the performance of a contract or in order to take steps to enter into a contract. Where you are contracting with us as a representative of a company (e.g. your employer): necessary for our legitimate interests of taking and fulfilling orders from companies (which does not unfairly cause you prejudice or affect your fundamental rights and liberties because it is used to complete the purchase you have requested).
If you are a U.S. employee and place an order with us as part of our employee discount program, we will collect the above Profile Data, as well as your employee file number from your pay stub in combination with your zip code and last four of Social Security Number.	This information is necessary to provide you with the product you ordered at the discounted, employee rate, or to take steps at your request prior to providing you with the product.	Necessary for the performance of a contract or in order to take steps to enter into a contract.
If you complete a warranty card, or ask us to provide	This information is necessary to register your	Where you are contracting with us on your own behalf: necessary for the performance

warranty services, we will collect the following Profile Data: your name, address, telephone number, and email address, in addition to the product(s) you purchased and the date of purchase.	product for the warranty or for us to provide warranty services.	of a contract or in order to take steps to enter into a contract. Where you are contracting with us as a representative of a company (e.g. your employer): necessary for our legitimate interests of providing warranties to companies in relation to their purchases (which does not unfairly cause you prejudice or affect your fundamental rights and liberties because it is used to enable the company to register for the warranty).
If you choose to complete a survey or leave a review, we will collect the following Profile Data: your name, address, email address, phone number and trade union affiliation.	This information is necessary for us to receive your input or feedback, which we then use to improve our products/services.	In some cases we may seek your specific consent for this processing (for example, in relation to processing your trade union affiliation to the extent that is categorized as Special Category Personal Data under applicable privacy laws). Where we do not seek your consent, but you voluntarily provide us with a review or a survey response (and no Special Category Personal Data is processed), our lawful basis for processing your personal data is that it is necessary for our legitimate interest of receiving your input or feedback about our products/services (which does not unfairly cause you prejudice or affect your fundamental rights and liberties because it is used with the aim of improving our products/services rather than making decisions in relation to you).
If you request or agree to receive electronic communications or mailings from us, including for marketing purposes, we may collect the following Profile Data: your name, email, phone number, or physical address.	This information is necessary to send you the information you have requested.	Consent.
If you enter a contest, we will collect the following Profile Data: your name, email, phone number, and physical address.	This information is necessary for you to enter the contest and for us to provide you with the prize should you win.	Consent.
If you sign up for the Klein Tools Tradesman Club or Klein Tools Loyalty Rewards programs, we will collect the following Profile Data: your name, email, phone number,	This information is necessary to register you (or the company whom you represent) for reward points and to service your (or your company's) account.	Where you are signing-up with the Klein Tools Tradesman Club or Klein Tools Loyalty Rewards programs on your own behalf: Necessary for the performance of a contract or in order to take steps to enter into a contract.

physical address, and order history.		
If you visit our website or interact with our electronic communications, we collect your IP address as well as electronic activity information about your use and interaction with our website or communications, and geolocation data. You can find more information on how we collect information in the <i>Cookies</i> section of this policy.	This data is necessary for us to ensure the security and functionality of our website and related systems. Furthermore, this data is used to offer products and services that may be of interest to you (or the company whom you represent).	This is necessary for our legitimate interest of ensuring that our websites function and are secure for you to use (which does not unfairly cause you prejudice or affect your fundamental rights and liberties because it provides you with a functional and secure website to use for purchases). With respect to using this data to offer products and services that may be of interest to you: • when you are using the website on your own behalf: consent. • When you are using the website as a representative of a company (e.g. your employer): necessary for our legitimate interests of promoting our products/services to the company which you represent (which does not cause you unfair prejudice because it relates to offering goods/services to your company rather than to you as an individual)
If you apply for a job with us through our website, we will collect your name, address, telephone number, Social Security Number or other government identification, email address, and employment and educational history.	This data is necessary to determine whether to extend an offer of employment. This data is also necessary to comply with our legal obligations (such as verifying the right to work).	Necessary in order to take steps prior to entering into an employment contract (or consent, if required for compliance with applicable data privacy laws). Necessary to comply with our legal obligations.
If you receive a conditional offer of employment from us, we may conduct a credit, drug and/or criminal history check, in accordance with and/or where permitted by local law.	This data is necessary to determine whether to confirm an employment offer.	Consent.

Where we rely on consent, depending on the applicable data protection/privacy law which applies, you have the right to withdraw your consent at any time by contacting us or by clicking on the "unsubscribe" link in marketing emails or text messages. Withdrawing consent will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you.

In cases where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you or the company whom you represent (for example, to provide you or the company whom you represent with goods or services). In such cases, we may have to cancel a product or service you or the company whom you represent have with us, but we will notify you at the time when this occurs.

Furthermore, where our processing of your personal data is necessary for our legit imate interests, depending on the applicable data protection/privacy law which applies, you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.

7. California residents

The personal data about you that we collect includes information within the below categories of data. These categories also represent the categories of personal data that we have collected over the past 12 months. Note that the categories listed below are defined by California state law. Inclusion of a category in the list below indicates only that, depending on the services and products we provide you, we may collect some information within that category. It does <u>not</u> necessarily mean that we collect all information listed in a particular category for all of our customers. With the exception of recording of sales calls, we disclose the below categories of information with our affiliates and service providers.

Category	Purpose of processing
Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.	A subset of this data is processed in connection with a number of our operational functions, including to take and deliver orders, to service our warranties, and to accept user-generated reviews. It may also be used for marketing purposes, including offering you products that may interest you. A subset of this data is necessary to open and manage an application for employment as well.
Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, your name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.	A subset of this data is processed in connection with a number of our operational functions, including to take and deliver orders, to service our warranties, and to accept user-generated reviews It may also be used for marketing purposes, including offering you products that may interest you. A subset of this data is necessary to open and manage an application for employment as well.
Characteristics of classes protected under federal or California law, including: familial status, disability, sex, national origin, religion, color, race, sexual orientation, gender identity and gender expression, marital status, veteran status, medical condition, ancestry, source of income, age, or genetic information.	This information is collected and processed where required by law or, if you are an employee, to provide you with employee benefits you have elected to receive. A subset of this data is necessary to open and manage an application for employment as well. It may also be necessary to accommodate any accessibility needs you may have if you come in to our facilities.

Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	A subset of this data is processed in connection with a number of our operational functions, including to take and deliver orders and to service our warranties. It may also be used for marketing purposes, including offering you products that may interest you.
Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.	This data is processed in order to optimize performance of our websites and to offer your products and services. It is also processed to detect security incidents, protect against malicious, deceptive, fraudulent or illegal activity, and for data analytics.
Geolocation data.	This data is processed for marketing purposes, including offering you products that may interest you through both direct and partner advertising.
Audio, electronic, visual, thermal, olfactory, or similar information.	This data is processed in connection with a number of our operational functions, including recording sales calls and other calls.
Professional or employment-related information.	A subset of this data is processed in connection with a number of our operational functions, including to take and deliver orders and to service our warranties. It may also be used for marketing purposes, including offering you products that may interest you.
	A subset of this data is necessary to open and manage an application for employment as well.

8. Cookies

A cookie is a small piece of data that a website asks your browser to store on your computer or mobile device. The cookie allows the website to "remember" your actions or preferences over time. Cookies are widely used by online service providers in order to (for example) make their websites or services work, or to work more efficiently, as well as to provide reporting information. Some cookies are strictly necessary for the functioning of our website.

Most Internet browsers support cookies; however, users can set their browsers to decline certain types of cookies or specific cookies by configuring their browser's privacy settings (please refer to your browser's help function to learn more about cookie controls). Further, users can delete cookies at any time. Note that if you disable cookies entirely, our websites may not function properly.

Why do we use cookies?

We use cookies to learn how you interact with our content and to improve your experience when visiting our website(s). For example, some cookies remember your preferences and where you left off so that you do not have to repeatedly make these choices when you visit one of our websites. They can also be used to remember which products you added to your cart while you continue to browse our websites. Additionally, cookies allow us to serve you specific content, such as videos on our website(s). We may employ the learnings of your behavior on our website(s) to serve you with targeted advertisements on third-party website(s) in an effort to "re-market" our products and services to you.

What types of cookies do we use?

Third-party cookies belong to and are managed by other parties, such as Google Analytics or service providers. These cookies may be required to render certain forms, such as email list sign-up, or to allow for some advertising outside of our website.

Session cookies are temporary cookies that are used to remember you during the course of your visit to the website, and they expire when you close the web browser.

Persistent cookies are used to remember your preferences within the website and remain on your desktop or mobile device even after you close your browser or restart your computer. We use these cookies to analyze user behavior to establish visit patterns so that we can improve our website functionality for you and others who visit our website(s). These cookies also allow us to serve you with targeted advertising and measure the effectiveness of our site functionality and advertising.

How are cookies used for advertising purposes?

Cookies and ad technology such as web beacons, pixels, and anonymous ad network tags help us serve relevant ads to you more effectively. They also help us collect aggregated audit data, research, and performance reporting for advertisers. Pixels enable us to understand and improve the delivery of ads to you, and know when certain ads have been shown to you. Since your web browser may request advertisements and web beacons directly from ad network servers, these networks can view, edit, or set their own cookies, just as if you had requested a web page from their site.

Although we do not use cookies to create a profile of your browsing behavior on third-party sites, we do use aggregate data from third parties to show you relevant, interest-based advertising. We do not provide any personal data that we collect to advertisers. You can choose not to enable off-site and third-party-informed advertising by adjusting your cookie settings. Doing so will not remove advertising from the pages you visit, but, instead, will result in the ads you see not being matched to your interests. This implies that the ad(s) you see will not be matched to your interests by those specific cookies.

How are third party cookies used?

For some of the functions within our websites we use third party suppliers, for example, when you visit a page with videos embedded from or links to YouTube. These videos or links (and any other content from third party suppliers) may contain third party cookies, and we encourage you to consult the privacy policies of these third party vendors on their websites for information regarding their use of cookies.

How do I reject and delete cookies?

You can choose to reject or block all or specific types of cookies for Klein Tool's websites and/or the websites of any third party suppliers by changing your browser settings. Please note that most browsers automatically accept cookies. Therefore, if you do not wish cookies to be used, you may need to actively delete or block the cookies. If you reject the use of cookies, you will still be able to visit our websites but some of the functions may not work correctly. You may also visit www.allaboutcookies.org for details on how to delete or reject cookies and for further information on cookies generally. By using our website without deleting or rejecting some or all cookies, you agree that we can place those cookies that you have not deleted or rejected on your device. You can also manage advertising cookies via https://optout.aboutads.info/.

Third-party cookies used on our websites:

For specific third-party cookies for this site, click <u>here</u>.

9. Do Not Track signals

Some browsers have incorporated "Do Not Track" (DNT) features that can send a signal to the websites you visit indicating you do not wish to be tracked. Because there is not yet a common understanding of how to

interpret the DNT signal, our services do not currently respond to browser DNT signals. For more information on DNT, see https://allaboutdnt.com/.

10. Disclosures of your personal data

We may disclose your personal data to our affiliated companies, when required by law, or to our service providers (e.g., when necessary for the administration and maintenance of our IT systems). Where you are have provided us with your personal data in your capacity as a representative of a company, we may disclose your personal data to that company. We require our service providers to provide written assurances regarding the security and privacy protections they have in place to protect any personal data transferred or disclosed to them, as well as their compliance with our security requirements and any applicable laws and regulations.

The third parties we may share your personal data with include:

- third-party service providers (for example, administration and maintenance of IT systems, payments providers, email marketing services providers);
- regulatory authorities;
- other companies in relation to managing the proposed sale, restructuring, transfer or merging of any or all part(s) of our business, including to respond to queries from the prospective buyer or merging organisation; and
- our auditors and legal advisors.

11. International transfers

Consistent with applicable data protection regulations, we may share personal data with our affiliates or other third parties, as detailed in paragraph 10. This means that your personal data processed in relation to this privacy policy may be stored and processed outside of your home country (and/or region), including in countries/regions that may not offer the same level of protection for your personal data as your home country (where you are an EU resident, this includes the processing of your personal data outside of the EU, including but not limited to the United States).

Where transfers from the E.U. to the United States take place (or any other country outside of the E.U.), or when we engage in a follow-on transfer from such country, we will use an appropriate legal mechanism, including (but not limited to) the EU Standard Contractual Clauses (or relevant exemptions where applicable under data protection regulations). We are not subject to the U.S. Foreign Intelligence Surveillance Act Section 702, and take other supplementary measures to protect data coming to the U.S.

Where transfers from Brazil to other countries take place, or when we engage in a follow-on transfer from such country, we will use an appropriate legal mechanism, including: (but not limited to) Standard Contractual Clauses; Global Corporate Rules; specific contractual clauses for a given transfer; specific and distinct consent by the data subject; or when other relevant exemptions are applicable under data protection regulations.

Where transfers from other non-E.U. countries to the United States take place (or any other country), or when we engage in a follow-on transfer from such country, we take steps required to comply with applicable data protection regulations.

12. Data security

We have put in place security measures (which will include, where relevant, those required by applicable law) to try to protect against your personal data processed in relation to this privacy policy from being accidentally lost, used or accessed in an unauthorized way, altered, or disclosed. In addition, we limit access to your personal data to employees, agents, contractors, and other staff who need to know for business purposes. They will only process your personal data processed in relation to this privacy policy according to our instructions and they are subject to the duty of confidentiality.

We have put in place procedures to deal with any suspected personal data security breach, and we will notify you and any applicable regulators of such a breach where we are legally required to do so.

13. Data retention

We will only retain your personal data for as long as is reasonably necessary to fulfil the purposes that we process it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements. We may retain your personal data for a longer period in the event of a complaint, or if we reasonably believe there is a prospect of litigation with respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from the unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting, or other requirements.

In some circumstances, we will anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without providing further notice to you.

14. Your legal rights

You may have the following rights available to you, depending on your jurisdiction or depending on the jurisdiction in which the data was collected, including the right to:

- Request confirmation of the existence of processing of your personal data, which enables you to know if the company carries out processing of your personal data.
- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you. Depending on the applicable privacy laws (e.g California law), you may be entitled to request the categories and specific pieces of personal data that we have collected about you, the categories of sources from which the personal data was collected, the purposes of collecting the personal data, the categories of third parties we have shared the personal data with, and the categories of personal data that have been shared with third parties for a business purpose.
- Request the correction of the personal data that we hold about you. This enables you to have any incomplete, out-of-date, irrelevant, misleading, or inaccurate data we hold about you corrected, although we may need to verify the accuracy of the new data you provide to us.
- Request the erasure of your personal data. This enables you to ask us to delete or remove personal data. Note, however, that we may not always be able to comply with your request (for example, we cannot erase information if we are required to keep it for regulatory purposes or to fulfill an order you have placed).
- Restrict or object to the processing of your personal data when we are relying on a legitimate
 interest, and there is something about your particular situation which makes you want to object to
 the processing on this ground as you feel it impacts on your fundamental rights and freedoms. In
 some cases, we may demonstrate that we have compelling legitimate grounds to process your
 information which override your rights and freedoms.
- **Data portability**. In some instances, you may have the right to receive the information about you in a portable and readily usable format.
- **Oppose the processing** of your personal data for specific purposes (subject to certain conditions), when no legal impediment exists.
- Request information about public and private entities with which we have shared your personal data, making the processing involving shared use of data more transparent to you;

- Request information about the possibility of withholding consent and the consequences of doing so, avoiding undesirable implications which might harm your access to a specific service or product;
- Withdrawal of consent, at any time, by means of and express statement by you, through a free and facilitated procedure, ratified processing carried out under the protection of the previously expressed consent, as long as there is no request for erasure.
- Opt-out of the sale of personal data. For purposes of California law, we do not sell your personal information to third parties, nor do we intend to, as those terms are defined in the CCPA. We also have not done so for the last 12 months. For third party cookie providers, which also collects data for their own purposes, please see section 8 above. You also have a choice whether to accept those cookies prior to navigating to our website, and you are free not to leave reviews or other user-generated content. In addition, we have contracts with our service providers to prohibit any sale of the personal information we provide them; but if you have any concerns that our third parties might be selling your information, please contact us.

You will not have to pay a fee to access your personal data (or to exercise any of your other rights). However, where permitted under applicable privacy laws, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances. If we refuse to give you access to your personal data, we will give you a written notice (if required to do so by applicable privacy laws) setting out the reasons for our decision (except where it would be unreasonable for us to do so) and any mechanisms that are available to you to complain about the refusal.

Please note that, where required by law (such as in California), we may need to verify your identity when you request to exercise privacy rights. To do so, we may ask you to confirm information we already have on file, or provide such other proof as we need in order to determine and confirm your identity before responding to your request. Also, under California law (and as may be expected in other jurisdictions as well), if you would like to authorize someone to make a request on your behalf, you must provide the agent with written, signed permission to submit privacy right requests on your behalf, or provide a letter from your attorney. The agent or attorney must provide this authorization at the time of request. Note that we may require you to verify your identity with us directly before we provide any requested information to your approved agent.

We will not discriminate against you in any way for exercising your rights.

Depending on the applicable data protection/privacy law which applies, you may also have the right to lodge a complaint with local state regulators/data protection authorities – please see paragraph 16.

Where required to do so by applicable privacy laws, we will inform (promptly) the entities with whom we have a shared use of your data about the correction, deletion, anonymization or blocking of your personal data, so that they may repeat the same procedures, except in cases where this communication is demonstrably impossible or involves disproportionate effort.

What we may need from you

We may need to request specific information from you to help us verify your identity and ensure your right to access your personal data (or to exercise any of your other rights). Where applicable, this is a security measure to ensure that the personal data is not disclosed to any person who has no right to receive it. For example, we may verify the email address we have on file with the email address from which you are sending a request. We may also ask you to verify certain past orders, or to confirm your last four digits on a card you recently used to place an order. If you have an account with us, we may ask you to verify yourself by logging in. We may also contact you to ask you for further information in relation to your request, in order to speed up our response.

How to submit an access or delete request

If you would like to request access to your personal information or to have us delete personal information, please submit the request through our webform, or contact us via the methods indicated below.

15. Children (and Adolescents' Personal Data)

These websites are not intended for use by children or by adolescents (to the extent that local privacy laws distinguish between children and adolescents), and we do not knowingly collect data relating to children under the age of 16 or adolescents under the age of 18 (in relation to the processing of personal data detailed in this privacy policy).

16. Contact us

If you have any questions about this privacy policy or our privacy practices, please call us toll free at 1-800-553-4676 or email us at privacy@kleintools.com. You can also contact us at: https://www.kleintools.com/content/contact-us.

If you are contacting us to complain about an alleged breach of this privacy policy or our privacy obligations at law, please provide us with as much detail as possible in relation to your complaint. We will take any privacy complaint seriously and any complaint will be assessed with the aim of resolving it in a timely and efficient manner. We request that you cooperate with us during this process and provide us with any information that we may need.

Without prejudice to any other administrative or judicial remedy you might have, you may have the right to lodge a complaint with local state regulators/data protection authorities if you believe that we have infringed applicable privacy or data protection requirements when processing personal data about you.

The appropriate data protection authority in the United Kingdom is:

The Information Commissioner's Office Water Lane, Wycliffe House Wilmslow – Cheshire SK9 5AF Telephone: +44 1625 545 745

E-mail: international.team@ico.org.uk

Website: https://ico.org.uk

The appropriate data protection authority in Australia is:

The Office of the Australian Information Commissioner Level 3, 175 Pitt Street Sydney, NSW 2000

Telephone: 1300 363 992 E-mail: enquiries@oaic.gov.au Website: https://www.oaic.gov.au

The appropriate data protection authority in México is:

National Institute of Transparency, Access to Information and Personal Data Protection

Insurgentes Sur 3211, Col. Insurgentes Cuicuilco,

Coyoacan, Zip Code 04530

Mexico City

Telephone: 018008354324

E-mail: <u>atencion@inai.org.mx</u>

Website: http://inicio.inai.org.mx/SitePages/ifai.aspx