

# **PRIVACY POLICY**

**Last updated:** May 2019

Renew, LLC ( "Renew") is committed to protecting the privacy of individuals and has created this Policy in compliance with the law and in order to demonstrate our firm commitment to privacy. This Privacy Policy describes how Renew collects, uses, discloses, transfers, stores, retains or otherwise processes your information when you (whether in your individual or business capacity) access or use, in any manner, any content, products, services or related activities (collectively "Services"), including through the Internet domains owned or operated by Renew, which include, but are not limited to:

- <https://renew1daydentures.com>
- <https://renewmysmile.com>
- <https://renewcorp.com>

We refer to the above websites and all related websites as "sites" and to each of them as a "site." The terms "we," "us," and "our" refer to Renew and all associated companies and subsidiaries. When we refer to "you" or "your," we mean the person accessing the site. If the person accessing the site does so on behalf of, or for the purpose of, another person, including a business or other organization, "you" or "your" also means the other person, including a business organization.

Our Privacy Policy is intended to describe to you what data we collect -- and how -- and to what extent we use this data. The Policy also describes options we provide for you to access, update or otherwise take control of your personal data that we process. The Privacy Policy applies to your use of our Services, and it covers information collected in connection with your access to and use of our Services. Please read this Privacy Policy carefully. By continuing to interact with our Services, you are consenting to the practices described in this Privacy Policy.

## **OUR PRIVACY POLICY INCLUDES:**

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**GENERAL DISCLOSURE**

These sites are hosted in the United States and are intended for United States visitors. If you are visiting the sites from outside of the United States, please note that by providing your information, it is being transferred to, stored or processed in the United States, where our data center and servers are located and operated. Data processing refers to the conversion of raw data into more readable formats (graphs and documents, for example). The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country. By using our sites, you understand that your information will be transferred to our facilities in the United States and to third parties with whom we may share your information. If you are visiting from outside the United States, please see the provisions under our INTERNATIONAL PRIVACY POLICY. If you are visiting the sites from outside the United States and do not wish to allow the transfer of your personal data to the United States, you should not use the sites and opt-out of the collection of cookies. View our COOKIES POLICY.

We take your privacy and the protection of your personal data seriously. We will only store, process and disclose your personal data where we have practical business interest and in accordance with the law. We will make it clear when we collect personal information and will explain what we intend to do with it. We do our best to protect your privacy through the appropriate use of information security measures.

**COLLECTION AND USE OF INFORMATION ON THE SITES**

We collect different personal information from or about you depending on the manner in which you use our sites, including but not limited to collecting personal information from correspondence, faxes, live chats, e-mails, telephone inquiries, web forms, and other means of communication. We collect such information when we provide our Services, including providing dental products, and for other lawful purposes. We (and our affiliates and authorized service providers) may collect, store, transfer and use:

- a) information about your visits to and use of this sites;
- b) information about any transactions carried out on-site or in-person between you and us on or in relation to the sites, including information relating to any purchases you make of our Services;
- c) any information you provide to us if you correspond with us;
- d) if you create or attempt to create a business relationship with us, we may ask you for your name, age, geo-location and other demographic information, e-mail address, street address, zip code or other personal information. You may, however, visit the sites without providing that information.

In addition to the digital collection of information through this site, Renew collects certain other personal and medical information through telephone conversations and in-person meetings with our prospective customers. This information may include full name, contact information, teeth, mouth and medical issues, financial payment preferences, motivations for seeking a solution and marketing campaign sources. This information is captured and housed in the following systems:

- our Dental Practice Management Software;
- our Customer Relationship Management Software;
- our in-office iPad mobile devices;
- hand-written forms scanned and entered into our Practice Management Software;
- intra-company information-sharing systems such as texting, email and smart wearable devices.

## **USES**

We use this information to provide, improve and develop our Services, as well as to communicate with you about our Services and to market our services to you. If we send you marketing emails, each email will contain instructions permitting you to “opt out” of receiving future marketing or other communications.

We also collect anonymous, technical information about your usage of the sites automatically via Google Analytics. This system collects this information when you use and interact with our sites, including metadata, log files, cookie/device IDs, page load time, server response time, and approximate location information. We use this information to measure website performance and improve our systems. More specifically, we collect data related to interactions with the features, content and links (including those of third-parties, such as social media plugins) contained within the sites’ pages, Internet Protocol (IP) address, browser type and settings, the date and time you used our sites, information about browser configuration and plugins, language preferences and cookie data, information about devices, what operating system is used, device settings and unique device identifiers. If you prefer that such information not be anonymously tracked, you may download a browser add on to prevent (opt-out) this activity at <https://tools.google.com/dlpage/gaoptout>. For more detailed information

regarding how we use cookies and other technology, please review the additional information in our COOKIES POLICY.

We may also use your information for other purposes disclosed to you in connection with our Services from time to time.

#### **WHEN AND WITH WHOM DO WE SHARE YOUR INFORMATION**

We may share your information with trusted third parties who assist us in operating our sites and in conducting our business and business relationship with you. Third parties include, as examples, organizations that perform outsourcing and other services for us such as marketing and advertising, live chat messaging, payment processors, social media websites, order fulfillment organizations, shipping companies, warranty and other service organizations, data storage organizations and systems development and maintenance organizations.

These third-party service providers may access your personal information and may only use it as directed by us for the purpose of our requested service. We require all third parties to respect the security of your personal data. We do not allow our third party service providers to use your personal information for their own purposes, and they are only permitted to process your personal information in accordance with our instructions.

We do not allow third parties to collect personally identifiable data about your online or mobile activities over time and across different websites or mobile devices when you use the sites. We also will not sell your personal information.

We may share your personal information with other business entities in connection with the sale, assignment, merger or other transfer of all or a portion of Renew's business or assets to such business entity (including due to a sale in connection with a bankruptcy or dissolution). We will require any such purchaser, assignee or other successor business entity to honor the terms of this Privacy Policy.

We use servers and data storage from providers such as ViaWest (Denver, CO & Salt Lake City, Utah), GoDaddy (U.S. and global servers), Salesforce (9 managed data centers through U.S. and international), Buxton, Facebook and Google Drive.

As stated above, we use Google Analytics to help understand your usage of our sites and to improve our Services. We may disclose or use aggregated or de-identified information for any purpose. Aggregated Data may be derived from your personal information but does not directly or indirectly reveal your identity.

#### **GROUNDS TO PROCESS YOUR INFORMATION**

We rely on the following legal grounds to process your personal information, namely:

- Performance of a contract – We may need to collect and use your personal information to enter into a contract or to perform a contract that you or your company has with us.
- Consent – Where required by applicable law, we will rely on your consent for collecting your personal information.
- Legitimate interests – We may use your personal information for our legitimate interests to improve our Services. Consistent with our legitimate interests and any choices that we offer or consents that may be required under applicable law, we may use technical information as described in this Privacy Policy and use personal information for our marketing purposes. We do not allow third parties to collect personally identifiable information about your online activities over time and across different websites when you use the sites. We do not sell personal information.

## **COOKIES POLICY**

Our sites use first and third-party cookies for technical, analytical and advertising purposes. “First-party cookies” refer to cookies that are set by our sites, and we are the only ones with access to this information. On the other hand, “third-party cookies” or requests allow certain other third parties to have access to the information collected. Not all cookies are necessary to navigate the sites. Cookies used for analytical and advertising purposes, such as site analytics and advertising cookies (non-essential cookies) are not necessary to navigate our sites. You have the choice not to accept or to delete them anytime, and carry on browsing normally.

## **WHAT ARE COOKIES AND WHY WE USE THEM?**

Cookies are files that are downloaded on your computer or mobile device when you visit certain websites. Cookies allow us to track your browsing behavior, links clicked, items downloaded, your device type, and to collect various data, including analytics, about how you use and interact with our sites. This allows us to provide you with a better experience on our sites and more relevant product information. Cookies allow us to collect, analyze and improve the performance of our communications. We may also collect your location (IP address) so that we can personalize our interest-based online advertising. We believe that these interest-based ads provide you with more relevant and more interesting ads. However, you may choose to opt out of such targeted advertising from Renew at any time through the methods provided below. We comply with the Self-Regulatory Principles for Online Behavioral Advertising set forth by the Digital Advertising Alliance.

## **OPT-OUT OPTIONS**

- Network Advertising Initiative (NAI) – <http://www.networkadvertising.org/>
- Digital Advertising Alliance (DAA) – <http://www.aboutads.info/choices/>
- Digital Advertising Alliance Canada (DAAC) – <http://youradchoices.ca/choices>
- Digital Advertising Alliance EU (EDAA) – <http://www.youonlinechoices.com/>

- DAA AppChoices page – <http://www.aboutads.info/appchoices>

You can also restrict or block cookies that are set by the Services (or any other site on the Internet) by adjusting the settings in your browser. Please be aware that restricting cookies may impact the functionality of the Services. Most browsers allow you to refuse to accept cookies. Additional general information about cookies, including how to be notified about the placement of new cookies and how to disable cookies, can be found at [www.allaboutcookies.org](http://www.allaboutcookies.org).

### **SUPPLEMENTAL MARKETING DATA**

Supplemental data may be received about you from other sources, including publicly available databases or third parties from whom we have purchased data, in which case we may combine this data with information we already have about you so that we can update, expand and analyze the accuracy of our records, identify new customers, and provide information and products that may be of interest to you. If you provide us personal information about others, or if others give us your information, we will only use that information for the specific reason for which it was provided to us. To opt out of any database information about you that we may possess, please send notification to [info@renewcorp.com](mailto:info@renewcorp.com).

### **THIRD PARTY LINKS**

The sites contain links to other sites. Renew is not responsible for the privacy practices or the content of such websites, including any websites that may indicate a special relationship or partnership with us (such as co-branded pages or "powered by" or "in cooperation with" relationships). We do not share information we gather with other websites or any other entities or individuals unless such sharing is approved in advance by you. Other linked websites, however, may collect personal information from you that is not subject to our control. To ensure protection of your privacy, always review the privacy policies of the websites you may visit by linking from the sites. Please note that this Privacy Policy applies only to our sites, and not to other companies' or organizations' websites to which we link.

For instance, information collected through Google Analytics is shared with Google and its partners who may combine it with other information you've provided to them or they've collected from your use of their services. This information may be stored in Google's servers in the United States of America according to its privacy practices.

### **SOCIAL MEDIA**

We may collect information from other sources, such as social media platforms that may share information about how you interact with our social media content. We do not control how your personal information is collected, stored or used by such third-party websites or to whom it is disclosed. You should review the privacy policies

and settings on any social networking website that you subscribe to so that you understand the information they may be collecting and sharing. If you do not want your networking websites to share information about you, you must contact those websites and determine whether they give you the opportunity to opt-out of sharing such information. We are not responsible for how these third party websites may use information collected from or about you.

Further, our sites may include social media features, such as the Facebook Like button. Our integration of these features may allow third party social media to collect certain information, such as your IP address and which page(s) you are visiting when using our sites and Services, and to set a cookie to enable that feature to function properly. Your interactions with these features are governed by the privacy policy of the company providing it.

## **SECURITY**

Renew employs security measures utilizing industry-standard technology to protect the loss, misuse or alteration of personal information that you disclose through the sites. Personal information is stored in a secured database and sent via an encrypted Internet channel. Nevertheless, no online or computer environment is 100% secure, and we cannot guarantee absolute security of the transmission or storage of your information. We hold information about you both at our own premises and with the assistance of third party service providers. Further public disclosure here of our security measures could aid those who might attempt to circumvent those security measures. If you have additional questions regarding security, please feel free to contact us directly at [info@renewcorp.com](mailto:info@renewcorp.com).

## **LEGAL DISCLOSURE OF INFORMATION**

Renew may disclose personal information when we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be violating any agreement with Renew, or may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other users of the sites, or anyone else that could be harmed by such activities. We may disclose information in response to a subpoena, search warrant, in connection with judicial proceedings, or pursuant to court orders, legal process or other law enforcement measures. Renew may disclose or access personal information when we believe in good faith that the law requires it, to establish our legal rights or to defend against legal claims, and for administrative and other purposes that we deem necessary to maintain, service and improve our products and services.

## **RESPONSE TO "DO NOT TRACK" SIGNALS**

Some Internet browsers include the ability to transmit "Do Not Track" signals. Since uniform standards for "Do Not Track" signals have not yet been adopted, Renew does not process or respond to "Do Not Track" signals.

## **CHILD ONLINE PRIVACY PROTECTION ACT (COPPA) COMPLIANCE AND RELATED INFORMATION**

The Child Online Privacy and Protection Act (COPPA) regulates online collection of information from persons under the age of 13. It is our policy to refrain from knowingly collecting or maintaining personally identifiable information relating to any person under the age of 18. If you are under the age of 18, please do not supply any personally identifiable information through the sites. If you are under the age of 18 and have already provided personally identifiable information through the sites, please have your parent or guardian contact us immediately at [info@renewcorp.com](mailto:info@renewcorp.com) so that we can remove such information from our files.

## **LIMITATIONS**

We only collect the personal information necessary to fulfill the purposes identified to you prior to or at the time of collection, or any other reasonable and legitimate purposes or as required by law. We do not use or disclose your personal information, except for the purposes for which it was collected, or new purposes to which you have consented, or as required or otherwise permitted by applicable law. We do not, as a condition of providing services to you or on your behalf, or as an administrative or management requirement, require consent to the collection, use or disclosure of personal information beyond that reasonably required for such purposes, or to comply with its obligations under applicable law.

## **RETENTION OF PERSONAL INFORMATION**

We may keep a record of your personal information, including correspondence or comments, in the applicable file specific to you. We will utilize, disclose, or retain your personal information for as long as necessary to fulfill the purposes for which it was collected and for legal or business requirements. We will establish minimum and maximum retention periods and procedures for maintaining and destroying your personal information. When personal information is retained to make a decision about you, we will retain such information for the period required in order to comply with our internal compliance and data retention policies.

In some circumstances we may 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 further notice to you. This allows the specific information collected (name, email, address, phone number, etc.) to become anonymous, but allows Renew to keep the transaction or engagement data. For example, Renew will not be able to tell if John Smith registered for an event, but we will



be able to tell that a person registered for an event and maintain headcount and transactional history. This will allow Renew to maintain a level of information that helps us develop and improve our sites and Services.

## **CALIFORNIA PRIVACY RIGHTS**

California law permits residents of California to request certain details about our disclosure of your personal information by us to third parties for direct marketing purposes during the immediate preceding calendar year. If you are a California resident and would like to request this information, please contact us using the information provided under Contact Us.

### **ACCESS TO YOUR PERSONAL INFORMATION**

Subject to the exceptions provided by the applicable law, we will make available to you any specific personal information about you that we have collected, utilized or disclosed, upon your written request. We will make such information available to you in a form that is generally understandable, including explaining any abbreviations or codes and using an alternative format, if required. Simply send your request for access to the Renew Privacy Director listed by sending an e-mail to [info@renewcorp.com](mailto:info@renewcorp.com) or call us at +1 (844) 417-4111. Please be as specific as possible in your request so that we can meet the applicable timelines.

### **OPT-OUT AND UNSUBSCRIBE / EMAIL & TELEPHONE COMMUNICATIONS**

Email Delivery Policy: In compliance with the United States CAN-SPAM Act of 2003, we send only to email lists composed of recipients who have opted in to such communication and/or considered transactional relationship based on an existing business relationship. All emails that are sent whether the format be Text or HTML include an Unsubscribe/Opt-Out link. Any email recipient may elect at any time to Unsubscribe/Opt-Out via this link. Users may also opt-out of receiving any or all communications from Renew, including telephone and text messaging outreach by contacting us at [info@renewcorp.com](mailto:info@renewcorp.com).

### **RESPONSE TIMES**

We will make every reasonable effort to respond to each of your written requests not later than 30 days after receipt of such requests. When applicable, we will advise you in writing if we cannot meet your requests within this time limit. When applicable, you have the right to make a complaint to the appropriate privacy commission with respect to this time limit.

## **COSTS**

We expect to provide access without charge as a general matter. However, we reserve the right to collect a reasonable charge when you request the transcription, reproduction, or transmission of such information. We will notify you, following your request for transcription, reproduction, or transmission, of the appropriate amount that will be charged. You will then have the opportunity to withdraw your request.

## **IDENTIFYING YOU IN CONNECTION WITH REQUESTS**

We may require that you provide to us sufficient information to identify yourself before we provide information about the existence, use, or disclosure of your personal information in our possession. Any such information shall be used only for this purpose.

## **CONTACT US**

Personal information is generally located at our corporate or divisional offices in the United States. A list of corporations, divisions, subsidiaries and affiliates to which this Privacy Policy applies is available upon request. Please direct all complaints or other inquiries regarding personal information, the Privacy Policy and Cookies Policy to our Privacy Director as follows: [info@renewcorp.com](mailto:info@renewcorp.com) or call us at +1 (844) 417-4111

## **CHANGES TO OUR PRIVACY POLICY**

This Privacy Policy may be revised from time to time as we add new features and services, as laws change, and as industry privacy and security best practices evolve. We display the effective date of this Privacy Policy at the top of this Privacy Policy so that it will be easier for you to know when there has been a change. If we make any material change to this Privacy Policy regarding use or disclosure of personal information, we will provide advance notice on this sites. Changes will apply to information collected after the change is effective. Please check this Privacy Policy periodically for changes. Small changes or changes that do not significantly affect individual privacy interests may be made at any time and without prior notice. Your use of the sites constitutes acceptance of the provisions of this Privacy Policy and your continued usage after such changes are posted constitutes acceptance of each revised Privacy Policy. If you do not agree to the terms of this Privacy Policy or any revised Privacy Policy, please exit the sites immediately. If you have any questions about this Privacy Policy, the practices of the sites, or your dealings with the sites, you can email us at [info@renewcorp.com](mailto:info@renewcorp.com) or call us at +1 (844) 417-4111.

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## **INTERNATIONAL PRIVACY POLICY**

Both the above general Privacy Policy and this International Privacy Policy (the "International Policy") apply to those visiting the sites or using our Services from Canada and member states of the European Union except that, for such persons (and only for such persons), where the provisions of the general Privacy Policy and the International Policy cannot be construed consistently, the International Policy will govern.

The Canadian Personal Information Protection and Electronic Documents Act ("PIPEDA") and the European Union General Data Protection Regulation ("GDPR") impose requirements regarding the collection, use, and disclosure of personal data in relation to our commercial activities, as does private-sector privacy legislation in their local jurisdictions, provinces and territories.

**THIS INTERNATIONAL POLICY APPLIES TO ALL PERSONAL DATA ABOUT YOU THAT WE COLLECT, HOLD, USE AND DISCLOSE, REGARDLESS OF THE WAY IN WHICH WE COLLECT IT (I.E. WHETHER THROUGH A SITE OR OTHERWISE).**

### **1. Personal Data**

In this International Policy, personal data is as defined by applicable European Union and Canadian law. It generally means any information about an identifiable individual. It may include your name, age, mailing address, residential phone number, or e-mail address, personal history (including financial and credit information, donations, personal health information, billing history, personal family and relationship matters, and penal or criminal information), personal information related to corporate involvements, work experience (past and present), discipline, income and benefits, medical records, tax records and security clearances.

### **2. Collection of Personal Data**

We collect personal data from the sites, as well as through correspondence, faxes, live chats, e-mails, telephone inquiries, web forms, and other means of communication. We collect such information when we provide publication services, digital services and other lawful services.

We (and our affiliates and authorized service providers) may collect, store and use the information discussed above in COLLECTION AND USE OF INFORMATION ON THE SITES.

We also may collect information about your computer and your visits to the sites such as your IP address, geographical location, browser type, domain names, referring website addresses, access times, length of visit and number of page views. We may

use this information in the administration of the sites, to improve the usability of the sites, to provide better service, to send you newsletters, updates, marketing communications, and other information or that may be of interest to you. We also use outside services such as Google Analytics to gather data about visitors to our sites. We may sometimes permit our authorized service providers to have access to aggregate statistics about our customers, sales, traffic patterns, usage and related information.

We often collect personal data from you or from third parties and as agents on behalf of third parties, where we have obtained the requisite consent to do so or as otherwise permitted by law. Third parties include, as examples, organizations for whom we provide services to you or on your behalf, and organizations that perform outsourcing and other services for us (such as payment processors, order fulfillment organizations, shipping companies, warranty and other service organizations, and systems development and maintenance organizations).

Where we are the Data Controller with regard to that data you may exercise your rights as data subject, including the right to object to the processing of your personal data when it is processed based on legitimate interests as provided in this International Policy below.

### **3. How We Use Personal Data**

As a general matter, we collect your personal data primarily to provide Services to our customers, for administrative or management requirements and to enhance our relationships with our customers.

Renew collects and uses your personal data to operate its sites and deliver the Services you have requested.

Renew may also use your personal data to inform you of other products or services available from Renew and its affiliates. Renew may also contact you via surveys to conduct research about your opinion of current services or of potential new services that may be offered.

Renew does not sell, rent or lease its customer lists to third-parties.

Renew may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, your personal data (e-mail, name, address, telephone number) is not transferred to the third-party. Renew may share data with trusted partners to help perform statistical analysis, send you email or postal mail, provide customer support, or arrange for deliveries. All such third parties are prohibited from using your personal data except to provide services to you, and they are required to maintain the confidentiality of your data.

Renew may keep track of the websites and pages our users visit within Renew in order to determine what Services are the most popular. This data is used to deliver customized content and advertising within Renew to customers whose behavior indicates that they are interested in a particular subject area.

Renew will disclose your personal data only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on Renew or the site; (b) protect and defend the rights or property of Renew; and/or (c) act under exigent circumstances to protect the personal safety of users of Renew, or the public.

#### **4. The Basis On Which We Process Your Personal Data**

We rely on the following legal grounds to process your personal data, namely:

- a) Performance of a contract – We may need to collect and use your personal data to enter a contract or to perform a contract that you or your company has with us.
- b) Consent – Where required by applicable laws, we will rely on your consent for collecting your personal data.
- c) Legitimate interests – We may use your personal data for our legitimate interests to improve our Services. Consistent with our legitimate interests and any choices that we offer or consents that may be required under applicable laws, we may use technical information as described in this Privacy Policy and International Policy and use personal data for our marketing purposes.

We will only process personal data for a specific purpose or for any other purposes specifically permitted by applicable data protection legislation.

#### **5. Obtaining Consent**

Except when otherwise permitted by law, we obtain the requisite consent prior to collecting and, in any case, prior to using or disclosing your personal data for any purpose. You may provide your consent to us orally, in writing, by electronic communication or any other means reasonably capable of conveying your consent. We will obtain your express consent if we collect, use or disclose sensitive personal data in our capacity as a data controller. We may also share data with third-party partners for whom you have given us consent. Your consent may also be intrinsic to the circumstances such as in the case where you have already provided personal data to us and you maintain your relationship with us or where you provide our representatives with your phone number so that we can contact you. Except when otherwise permitted by law, we will only use the data for the purpose for which it was given. From time to time, we may collect, utilize or disclose your personal data based on your consent and as otherwise permitted by law.

When your consent is required, you may withdraw your consent at any time (unless withdrawing the consent would frustrate the performance of legal obligations) upon providing to us a 30-day notice. However, the withdrawal of your consent may adversely affect our ability to provide Services to you and to maintain our relationship.

## **6. Third Parties**

We remain responsible for all personal data communicated to third parties for processing. As such, we ensure that third parties that are engaged to provide products or services on our behalf and are provided with personal data are required to observe the intent of this International Policy by having comparable levels of security protection or, when required, by assuring us (such as, through a confidentiality agreement) that they will not use or disclosure the personal data for any purpose other than the purpose for which the personal data was communicated.

## **7. Limitations**

We only collect the personal data necessary to fulfill the purposes identified to you prior to or at the time of collection, or any other reasonable and legitimate purposes, or as required by law.

We do not use or disclose your personal data, except for the purposes for which it was collected, or new purposes to which you have consented, or as required or otherwise permitted by applicable law.

We do not, as a condition of providing services to you or on your behalf, or as an administrative or management requirement, require consent to the collection, use or disclosure of personal data beyond what is reasonably required for such purposes, or to comply with our obligations under applicable law.

## **8. Access And Rights To Your Personal Data**

Subject to the exceptions provided by the applicable law, we will make available to you any of your personal data that we have collected, utilized or disclosed, upon your written request. We will make such information available to you in a form that is generally understandable, including explaining any abbreviations or codes and using an alternative format, if required. If you are located in the European Economic Area ("EEA"), the GDPR provides you rights of access, rectification, erasure, restriction, objection or portability in line with the type of services being provided. Simply send your request, using the Request Form provided, to the Privacy Officer listed below. Please be as specific as possible in your request so that we can meet the applicable time lines.

### **REQUEST FORM**

If you are located in the EEA you also have the right to lodge a complaint to your Supervisory Authority.

## **9. Response Times**

We will make every reasonable effort to respond to each of your written requests not later than 30 days after receipt of such requests. When applicable, we will advise you in writing if we cannot meet your requests within this time limit. When applicable, you have the right to make a complaint to the appropriate supervisory authority with respect to this time limit.

## **10. Costs**

We expect to be able to respond to your request without charge as a general matter. However, we reserve the right to collect a reasonable charge when you request the transcription, reproduction or transmission of such information. We will notify you, following your request for transcription, reproduction or transmission of the appropriate amount that will be charged. You will then have the opportunity to withdraw your request.

## **11. Identifying You In Connection With Requests**

We may require that you provide to us sufficient information to identify yourself before we provide information about the existence, use or disclosure of your personal data in our possession. Any such information shall be used only for this purpose.

## **12. Opt-Out And Unsubscribe**

We respect your privacy and give you an opportunity to opt-out of receiving certain information. Users may opt-out of using the instructions located in e-mails sent by Renew or by contacting us at EMAIL.

## **13. Accuracy**

We will use reasonable efforts to ensure that your personal data is kept as accurate, complete and up-to-date as possible. We will not routinely update your personal data, unless necessary. In order to help us maintain and ensure that your personal data is accurate and up to date, you must inform us, without delay, of any change in the data you provided to us.

You can at any time, challenge the accuracy or completeness of the personal data we have about you, subject to the exceptions provided by applicable law. If you demonstrate that the personal data we have on you is inaccurate or incomplete, we will amend the personal data as required. Where appropriate, we will transmit the amended data to third parties to whom we have communicated your personal data.

## 14. Safeguards

We use security safeguards appropriate to the sensitivity of personal data to protect it from loss or theft, as well as unauthorized access, disclosure, copying, use or modification. These safeguards include physical measures, such as restricted access to offices and equipment, organizational measures, such as security clearances and publishing this policy to appropriate personnel with instructions to act in accordance with its principles (for example, limiting access on a “need to know” basis), and technological measures, such as the use of passwords and/or encryption.

Personal data is generally located at our corporate or divisional offices. A list of corporations, divisions, subsidiaries and affiliates to which this Privacy Policy and International Policy apply is available upon request.

## 15. Contact

Please direct all complaints or other inquiries regarding personal information, the General Policy, or the International Policy to our Privacy Manager pursuant to the above CONTACT US section.

### TABLE OF COOKIES

Cookie Name	Type of Cookie & Purpose	Source	Retention Period
_gat_UA-79356910-1 _ga _gid _utma _utmz	These cookies allow us to measure the number of Visits to the website and hence understand the Customer’s website experience and segment visitors who are new to the site from those who are returning. This cookie tracks the visitors’ behavior such as visits and interactions with the site. The information collected is used for analytical and advertising purposes.	Google.com	26 months