



## Website Privacy Policy

Last modified: October 6, 2023

### Introduction

Merit Brass Co. ("Company" or "We") is committed to protecting the privacy of its users. This privacy policy outlines the types of information we collect from users when they visit [www.meritbrass.com](http://www.meritbrass.com), [www.mbwebxpress.com](http://www.mbwebxpress.com) and any other Merit Brass Co. registered domains (our "Website") and how we collect, use, disclose, maintain and protect that information. By accessing or using the Website, you consent to the terms of this privacy policy.

This policy applies to information we collect:

- On this Website.
- In email, text, and other electronic messages between you and this Website.
- Through mobile and desktop applications you download from this Website, which provide dedicated non-browser-based interaction between you and this Website.
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.
- It does not apply to information collected by:
  - Us offline or through any other means, including on any other website operated by Company or any third party; or
  - Any third party, including through any application or content (including advertising) that may link to or be accessible from or through the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this privacy policy. This policy may change from time to time ([see Changes to Our Privacy Policy](#)). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

### Children Under the Age of 16

Our Website is not intended for children under 16 years of age. No one under age 16 may provide any information to or on the Website. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on this Website or through any of its features, or provide any information about yourself to us, including your name, address, telephone number, email address,



or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at 800-726-9800.

California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information. Please see Your State Privacy Rights below for more information.

### **Information We Collect**

We may collect the following types of information from users:

1. Personal information: We may collect personal information such as name, email address, company name, mailing address and phone number.
2. Usage information: We may collect information about how users interact with our Website, such as the pages visited, time spent on the website and IP address.
3. Cookies: We may use cookies to collect information about user activity on our Website. Cookies are small data files stored on a user's computer that help us personalize user experience, remember user preferences and improve website performance.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the Website. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.

The information we collect on or through our Website may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of registering to use our Website, subscribing to our service, or requesting further services. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem with our Website.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Your search queries on the Website.

You also may provide information to be published or displayed (hereinafter, "posted") on public areas of the Website, or transmitted to other users of the Website or third parties (collectively, "User Contributions"). Your User Contributions are posted on and transmitted to others at your own risk. Although we may limit access to certain pages,

please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Website with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

#### Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking).

The information we collect automatically may be only statistical data and does not include personal information, or we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- Web Beacons. Pages of our Website may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

We do not collect personal information automatically, but we may tie this information to personal information about you that we collect from other sources or you provide to us.

### Third-Party Use of Cookies and Other Tracking Technologies

Some content or applications, including advertisements, on the Website are served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see [Choices About How We Use and Disclose Your Information](#).

### **How We Use Your Information**

We may use the information we collect from users for the following purposes:

1. To improve user experience: We may use information about how users interact with our website to improve website design, functionality and content.
2. To personalize content: We may use cookies and other technologies to personalize user experience and remember user preferences.
3. To communicate with users: We may use personal information to respond to user inquiries, provide customer support and send marketing communications.
4. To present our Website and its contents to you.
5. To provide you with information, products, or services that you request from us.
6. To fulfill any other purpose for which you provide it.
7. To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
8. To notify you about changes to our Website or any products or services we offer or provide through it.
9. In any other way we may describe when you provide the information.
10. For any other purpose with your consent.

We may also use your information to contact you about our own and third-parties' goods and services that may be of interest to you. If you do not want us to use your information in this way, please check the relevant box located on the form on which we collect your data (the order form or registration form), adjust your user preferences in your account profile or email us at [mbmarketing@meritbrass.com](mailto:mbmarketing@meritbrass.com). For more information, see Choices About How We Use and Disclose Your Information.

We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.]

### **How We Share Your Information**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Company about our Website users is among the assets transferred.
- To fulfill the purpose for which you provide it. For example, if you give us an email address to use the "email a friend" feature of our Website, we will transmit the contents of that email and your email address to the recipients.
- For any other purpose disclosed by us when you provide the information.
- With your consent.
- Website hosting: We may disclose our personal information with our website hosting company if you are having issues interacting with the Website.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our terms of use [<https://meritbrass.com/en/website-terms-of-use>] and other agreements, including for billing and collection purposes.

- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Company, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

### **How We Protect Your Information**

We take reasonable measures to protect user information from unauthorized access, disclosure or misuse. We use a variety of security measures to protect user data.

### **Data Security**

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Any payment transactions will be encrypted.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website like message boards. The information you share in public areas may be viewed by any user of the Website.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

## Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- Tracking Technologies and Advertising. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
- You can also always opt-out by sending us an email with your request to [mbmarketing@meritbrass.com](mailto:mbmarketing@meritbrass.com) or fill out our contact form at <https://meritbrass.com/en/contact-us>
- If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions. This opt out does not apply to information provided to the Company as a result of a product purchase, warranty registration, product service experience or other transactions.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

Residents of certain states, such as California, Nevada, Colorado, Connecticut, Virginia, and Utah may have additional personal information rights and choices. Please see Your State Privacy Rights for more information.

## Your State Privacy Rights

State consumer privacy laws may provide their residents with additional rights regarding our use of their personal information. To learn more about California residents' privacy rights, visit [[CCPA AND CPRA PRIVACY NOTICE FOR CALIFORNIA RESIDENTS](#)].

Colorado, Connecticut, Virginia, and Utah each provide their state residents with rights to:

- Confirm whether we process their personal information.
- Access and delete certain personal information.
- Data portability.
- Opt-out of personal data processing for targeted advertising and sales.

Colorado, Connecticut, and Virginia also provide their state residents with rights to:

- Correct inaccuracies in their personal information, taking into account the information's nature processing purpose.



- Opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects.

To exercise any of these rights please email [mbmarketing@meritbrass.com](mailto:mbmarketing@meritbrass.com).

### **Changes to Our Privacy Policy**

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will notify you through a notice on the Website home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

### **Contact Us**

If you have any questions or concerns about this privacy policy please contact us at 800.726.9800 or click [here](#).

### **Your California Privacy Rights**

If you are a California resident, the following provisions apply to our processing of information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household subject to the California Consumer Privacy Act of 2018 ("CCPA"). For such consumers, the provisions of this section prevail over any conflicting provisions of this Privacy Statement. We adopt this section of our Privacy Statement to comply with the CCPA of and any terms defined in the CCPA have the same meaning when used in this section.

### **Information We Collect**

Our Website collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular device ("personal information") but not the specific consumer. We have collected (or not collected, if indicated below) the following categories of personal information from our consumers within the last twelve (12) months:

<b>Category</b>	<b>Examples</b>	<b>Collected</b>
A. Identifiers.	A real name, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.	NO



<p>B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</p>	<p>A name, signature, address, telephone number, education, employment, employment history, credit card number, debit card number, or any other methods of payment for our products, or medical information. Some personal information included in this category may overlap with other categories.</p>	<p>NO</p>
<p>C. Protected classification characteristics under California or federal law.</p>	<p>Age (40 years or older), medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), veteran or military status.</p>	<p>NO</p>
<p>D. Commercial information.</p>	<p>Records of products or services purchased, obtained, or considered.</p>	<p>YES</p>
<p>E. Biometric information.</p>	<p>Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.</p>	<p>NO</p>

F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

We obtain the categories of personal information listed above from the following categories of sources:

- Direct interactions. You may give us your information by filling in forms or by corresponding with us by mail, phone, fax, email or webform. This includes, but may not be limited to, personal data you provide when you:

- Purchase our products;
- Create a user account on our website;
- Subscribe to our publications;

- Request marketing be sent to you;
  - Interact with our website;
  - Interact with social media by visiting our pages, commenting on or liking posts;
  - Enter a competition, promotion, or survey; or
  - Provide information in-person at industry events or other venues, or providing information by phone, fax or email.
- Automated technologies or interactions. As you interact with our Website, we may automatically collect data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.
  - Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:
    - Technical data from the following parties: (a) Analytics providers such as Google; (b) Advertising networks such as Google Adwords, Bing Adcenter and Amazon ads; (c) Data from providers of technical, payment and delivery services.

### **Use of Personal Information**

We may use and/or disclose the personal information we collect for one or more of the following business purposes:

- To register you as a new customer
- To process and deliver your order including: (a) Managing payments, fees and charges, (b) Collecting and recovering money owed to us
- To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy, (b) Asking you to leave a review or take a survey
- To enable you to partake in a prize draw, competition, or complete a survey
- To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)
- To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you
- To use data analytics to improve our website, products/services, marketing, customer relationships and experiences
- To make suggestions and recommendations to you about goods or services that may be of interest to you

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

### **Sharing Personal Information**

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we require a signed contract

and that the recipient both keep that personal information confidential and not use it for any purpose except performing the contract.

We share your personal information with the following categories of third parties:

- Authorized distributors and shippers of our products.
- Service providers acting as data processors.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.

### **Disclosures of Personal Information for a Business Purpose**

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

- Category D: Commercial information.
- Category F: Internet or other similar network activity.
- Category G: Geolocation data.
- Category K: Inferences drawn from other personal information.

In the preceding twelve (12) months, Office Depot has not disclosed the following categories of personal information for a business purpose:

- Category A: Identifiers.
- Category B: California Customer Records personal information categories.
- Category C: Protected classification characteristics under California or federal law.
- Category E: Biometric information.
- Category H: Sensory data.
- Category I: Professional or employment-related information.
- Category J: Non-public education information.

### **Your Rights and Choices**

The CCPA provides California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

#### ***Access to Specific Information and Data Portability Rights***

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The specific pieces of personal information we collected about you

#### ***Deletion Request Rights***

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it

### ***Do Not Sell My Personal Information***

You have the right to opt out of the sale of your individual and household personal information. Once we receive your request, we will opt you out from the sale of such information. This website uses certain third-party tracking tools that collect information about you passively.

### ***Exercising Access, Deletion, and Do Not Sell Rights***

To exercise the access, deletion rights, and do not sell rights described above, please submit a verifiable consumer request to us by e-mailing us at [mbmarketing@meritbrass.com](mailto:mbmarketing@meritbrass.com).

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. We currently do not collect household data. If all the members of a household make a right to Know or Rights to Delete request, we will respond as if the requests are individual requests.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

### **Response Timing and Format**

We will provide a confirmation email to you within 10 days of receipt of a request. The confirmation email will explain how we will verify a request which will vary depending on the type of request made. We endeavor to respond to a verifiable consumer request for access or to delete within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our response to the email address you provided when you made your request. For a request not to sell your information, we will respond as soon as feasibly possible, but no later than 15 days from the date we receive the request.

Any disclosures we provide may only cover the 12-month period preceding a verifiable consumer request. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance (e.g. Microsoft Excel file and/or Adobe PDF file).

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### **Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by law, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.