

Last updated: 8/21/2026

I. Overview

This Privacy Policy describes Our policies and procedures on the collection, use and disclosure of Your information when You use the Service and tells You about Your privacy rights and how the law protects You.

Hi-Rel Products, LLC

Address: 16 Plains Road Essex, CT 06426

Email: mdeming@hi-rel.net

Hi-Rel Products, LLC ("Company," "we," "us," "our") is the data controller for personal information collected through websites and online services that link to this Privacy Policy, unless a specific affiliate privacy notice states otherwise.

This Privacy Policy describes how we collect, use, disclose, retain, and otherwise process Personal Data in connection with the Services and the privacy rights and choices that may be available to You.

This Privacy Policy does not apply to third-party websites, applications, products, or services that maintain their own privacy notices.

II. Interpretation and Definitions

Interpretation. The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

Definitions. For the purposes of this Privacy Policy:

Account means a unique account created for You to access our Service or parts of our Service.

Business, for the purpose of the CCPA/CPRA (California Consumer Privacy Act/California Privacy Rights Act), refers to the Company as the legal entity that collects Consumers' personal information and determines the purposes and means of the processing of Consumers' personal information, or on behalf of which such information is collected and that alone, or jointly with others, determines the purposes and means of the processing of consumers' personal information, that does business in the State of California.

Company (referred to as either "Company", "We", "Us" or "Our" in this Agreement) refers to **Hi-Rel Products, LLC, operating at 16 Plains Road Essex, CT 06426**. Where our affiliate operates a specific website or service, that affiliate may act as a separate controller and will provide notice where required.

Consumer, for the purpose of the CCPA/CPRA, means a natural person who is a California resident, as defined in the state's tax regulations, however identified, including by any unique identifier.

Cookies are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.

Country refers to United States

Data Controller, for the purposes of the GDPR (General Data Protection Regulation), refers to the Company as the legal person which alone or jointly with others determines the purposes and means of the processing of Personal Data.

Device means any device that can access the Service such as a computer, a cellphone or a digital tablet.

Personal Data is any information that relates to an identified or identifiable individual.

For the purposes of GDPR, Personal Data means any information relating to You such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity.

For the purposes of the CCPA/CPRA, Personal Data means any information that identifies, relates to, describes or is capable of being associated with, or could reasonably be linked, directly or indirectly, with You.

Sale, for the purpose of the CCPA (California Consumer Privacy Act), means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a Consumer's personal information to another business or a third-party for monetary or other valuable consideration.

Service or Services means our websites and other online or offline services that link to or otherwise provide this Privacy Policy, including forms, event-registration pages, marketing pages, and related services.

Service Provider means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used. For the purpose of the GDPR, Service Providers are considered Data Processors.

Usage Data refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

Website refers to the Company, accessible from <https://www.hi-rel.com/> and websites maintained by any other associated business unit that link to this Privacy Policy.

You means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

Under GDPR (General Data Protection Regulation), You can be referred to as the Data Subject or as the User as you are the individual using the Service.

III. Collecting Data

A. Types of Data Collected

Personal Data

While using Our Service, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to:

- Email address, First name and last name
- Job title
- Mailing address
- Phone number
- Usage Data
- Account ID, User ID, account profile, settings and preferences, purchase history, subscriptions, and registrations
- User credentials (username and password) and similar security information, individual network activity in security and audit logs
- Payment and payment card information or bank account information, billing contact details, ship to and bill to information
- Commercial information (e.g., products or services purchased, obtained, or considered) and professional information (e.g., company/role) may also be collected depending on your interaction with us.

Third-Party Data

From time to time, the Company receives personal information about individuals from third-parties. This may happen, for example, if you attend an event and that event vendor shares a list to all sponsors/exhibitors. We may also collect your personal data from a third-party website (e.g. LinkedIn) if you fill out a form on that site requesting content from or registering for an event with the Company.

Correspondence

If you correspond with us by email, the postal service, or other form of communication, we may retain such correspondence and the information contained in it and use it to respond to your inquiry; to notify you of Company services.

IV. Usage Data

Usage Data is collected automatically when using the Service.

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a mobile device.

V. Tracking Technologies and Cookies

We use Cookies and similar tracking technologies to track the activity on Our Service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze Our Service. The technologies We use may include:

- **Cookies or Browser Cookies.** A cookie is a small file placed on Your Device. You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of our Service. Unless you have adjusted Your browser setting so that it will refuse Cookies, our Service may use Cookies.
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- **Web Beacons.** Certain sections of our Service and our emails 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 or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser. Learn more about cookies: [Cookies by PrivacyPolicies Generator](#).

We use both Session and Persistent Cookies for the purposes set out below:

- **Necessary / Essential Cookies**
Type: Session Cookies
Administered by: Us
Purpose: These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.
- **Cookies Policy / Notice Acceptance Cookies**
Type: Persistent Cookies
Administered by: Us
Purpose: These Cookies identify if users have accepted the use of cookies on the Website.
- **Functionality Cookies**
Type: Persistent Cookies
Administered by: Us
Purpose: These Cookies allow us to remember choices You make when You use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the Website.
- **Tracking and Performance Cookies**
Type: Persistent Cookies
Administered by: Third-Parties

Purpose: These Cookies are used to track information about traffic to the Website and how users use the Website. The information gathered via these Cookies may directly or indirectly identify you as an individual visitor. This is because the information collected is typically linked to a pseudonymous identifier associated with the device you use to access the Website. We may also use these Cookies to test new pages, features or new functionality of the Website to see how our users react to them.

For more information about the cookies we use and your choices regarding cookies, please visit our Cookies Policy or the Cookies section of our Privacy Policy.

VI. Use of Your Personal Data

The Company may use Personal Data for the following purposes:

- **To provide and maintain our Service**, including to monitor the usage of our Service.
- **To manage Your Account**: to manage Your registration as a user of the Service. The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.
- **For the performance of a contract**: the development, compliance and undertaking of the purchase contract for the products, items or services You have purchased or of any other contract with Us through the Service.
- **To contact You**: To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- **To provide You** with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless You have opted not to receive such information.
- **To manage Your requests**: To attend and manage Your requests to Us.
- **For business transfers**: We may use Your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Us about our Service users is among the assets transferred.
- **For other purposes**: We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Service, products, services, marketing and your experience.

VII. Retention of Your Personal Data

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Retention periods are determined based on documented criteria, including contractual necessity, legal obligations, dispute resolution, security logging, and regulatory requirements.

- **Security of Your Personal Data**
The security of Your Personal Data is important to Us, we take appropriate security measures to protect your personal information from unauthorized access, alteration, disclosure, or destruction. However, no data transmission over the internet or electronic storage is completely secure, and we cannot guarantee absolute security.
- **Data Storage and Retention**
Your personal data is stored by the Company and its business on its servers, and on the servers of the cloud-based database management services the Company engages, located in the United States. The Company retains data for the duration of the customer's business relationship with the Company or its business and for a period of time thereafter to allow for renewals, to analyze the data for the Company's own operations. For more information on where and how long your personal data is stored, and for more information on your rights of erasure and portability, please contact mdeming@hi-rel.net.

VIII. Transfer of Your Personal Data

Your information, including Personal Data, is processed at the Company's operating offices (Headquartered in the United States) and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information. The Company also enters into data processing agreements and model clauses with its vendors whenever feasible and appropriate.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

We may share Your personal information in the following situations:

- **With Service Providers:** We may share Your personal information with Service Providers to monitor and analyze the use of our Service, to contact You.
- **For business transfers:** We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company.
- **With Affiliates:** We may share Your information with Our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.
- **With business partners:** We may share Your information with Our business partners to offer You certain products, services or promotions.
- **With other users:** when You share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside.
- **With Your consent:** We may disclose Your personal information for any other purpose with Your consent.

IX. Disclosure of Your Personal Data

Business Transactions

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

Law enforcement

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Other legal requirements

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

X. Processing of Your Personal Data

We use third-party service providers, applications, software, platforms, and other technologies to support our business operations and provide, maintain, secure, analyze, and improve our Services. Depending on the nature of the service and our use of the technology, these providers may collect, receive, store, access, analyze, transmit, or otherwise process Personal Data on our behalf or in connection with the Services.

The specific providers and technologies we use may change from time to time. Rather than identifying each individual provider or application, the categories below describe the types of applications, software, platforms, and technology services that we may use and the general purposes for which they are used.

Customer Relationship Management and Sales Platforms. Used to manage customer and prospective customer relationships, business contacts, inquiries, quotations, opportunities, sales activities, account information, and related communications.

Marketing, Advertising and Lead Generation Platforms. Used to manage marketing communications and campaigns, identify prospective customers, manage mailing lists and subscriptions, measure campaign engagement, and support advertising and business-development activities.

Website, Analytics and Tracking Technologies. Used to operate and improve our websites and online Services, measure website traffic and performance, understand interactions with our Services, manage cookies, tags and similar technologies, and support search-engine optimization and related analytics.

Social Media and Professional Networking Platforms. Used for corporate communications, professional networking, recruiting, marketing, business development, and engagement with customers, prospective customers, and other external audiences.

Communication and Collaboration Platforms. Used to facilitate email, messaging, meetings, calls, calendars, file sharing, document collaboration, task management, and other internal and external business communications.

Business Operations, ERP and Supply Chain Systems. Used to support enterprise operations, order management, manufacturing, procurement, purchasing, inventory, supply-chain planning, supplier management, and related operational activities.

Human Resources and Workforce Management Systems. Used for recruiting, applicant tracking, employee administration, payroll, leave and attendance administration, workforce management, and other employment-related activities, where applicable.

Finance, Accounting and Payment Systems. Used for billing, invoicing, accounting, banking, payments, financial reporting, reconciliation, taxation, and related financial and administrative activities.

Shipping and Logistics Platforms. Used to arrange and manage shipments, deliveries, shipping addresses, consignee information, customs activities, shipment documentation, and related logistics processes.

Compliance and Regulatory Platforms. Used to conduct compliance reviews and screening, satisfy legal, regulatory, contractual, and customer requirements, maintain compliance records, and support regulatory reporting and other compliance activities.

IT, Cybersecurity and Identity Management Systems. Used to administer user accounts and identities, authenticate users, manage devices and technology assets, secure communications and systems, provide technical support, maintain security and audit logs, and detect or respond to security events.

Document Management and Electronic Signature Platforms. Used to create, store, transmit, organize, approve, execute, electronically sign, and otherwise manage contracts, records, and other business documents.

Survey and Feedback Platforms. Used to conduct surveys, collect feedback, measure customer or stakeholder satisfaction, and analyze responses.

Artificial Intelligence and Translation Tools. Used, where authorized, to assist with activities such as drafting, summarization, analysis, translation, communications, and other business functions. Personal Data processed through these tools will depend on the information provided and the applicable business purpose.

Business Intelligence and Reporting Tools. Used to aggregate, analyze, visualize, and report business, operational, financial, customer, and other information for business administration, planning, analytics, and decision-making.

Engineering and Technical Systems. Used to support engineering, product development, technical documentation, design, configuration management, software or systems development, and management of technical and operational information.

These categories describe the types of technology and service providers we may use rather than every individual application or provider. Systems may vary by business unit, location, function, or Service and may change as business and technology needs evolve.

We require service providers that process Personal Data on our behalf to process such information for authorized purposes and subject to applicable contractual, confidentiality, privacy, and security requirements, as appropriate and required by applicable law.

We maintain internal records of applicable applications, software, service providers, processing activities, and related privacy and security considerations, and review them to determine whether this Policy or other notices require updates.

The categories and examples described above do not mean that every category of technology is used in connection with every individual, Website, Service, business unit, or interaction with the Company.

XI. Your Rights

Your privacy rights depend on applicable law and may include rights to access, correct, delete, restrict or object to processing, obtain a portable copy, and opt out of certain uses of Personal Data. We will not knowingly discriminate against You for exercising applicable privacy rights.

- Right to confirm we process your personal information and, if so, to access, correct, complete, object to or restrict the processing of, and delete certain personal information we hold about you, including the rights to receive your personal information in a portable copy.
- To opt-out of marketing emails from us, in which you may email us or click the unsubscribe link at the bottom of each email that you receive from us
- Depending on applicable U.S. state privacy law, You may have rights to opt out of targeted advertising, the sale or sharing of Personal Data, or certain profiling, as applicable.

Additional jurisdiction-specific rights may apply under applicable law.

- Depending on applicable U.S. state privacy law, You may have rights to opt out of targeted advertising, the sale or sharing of Personal Data, or certain profiling, as applicable.

GDPR Privacy

A. Legal Basis for Processing Personal Data under GDPR

We may process Personal Data under the following conditions:

- **Consent:** You have given Your consent for processing Personal Data for one or more specific purposes.
- **Performance of a contract:** Provision of Personal Data is necessary for the performance of an agreement with You and/or for any pre-contractual obligations thereof.
- **Legal obligations:** Processing Personal Data is necessary for compliance with a legal obligation to which the Company is subject.
- **Vital interests:** Processing Personal Data is necessary in order to protect Your vital interests or of another natural person.
- **Public interests:** Processing Personal Data is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Company.
- **Legitimate interests:** Processing Personal Data is necessary for the purposes of the legitimate interests pursued by the Company.

In any case, the Company will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

B. Your Rights under the GDPR

The Company undertakes to respect the confidentiality of Your Personal Data and to guarantee You can exercise Your rights.

You have the right under this Privacy Policy, and by law if You are within the EU, to:

- **Request access to Your Personal Data.** The right to access, update or delete the information We have on You. Whenever made possible, you can access, update or request deletion of Your Personal Data directly within Your account settings section. If you are unable to perform these actions yourself, please contact Us to assist You. This also enables You to receive a copy of the Personal Data We hold about You.
- **Request correction of the Personal Data that We hold about You.** You have the right to have any incomplete or inaccurate information We hold about You corrected.
- **Object to processing of Your Personal Data.** This right exists where We are relying on a legitimate interest as the legal basis for Our processing and there is something about Your particular situation, which makes You want to object to our processing of Your Personal Data on this ground. You also have the right to object where We are processing Your Personal Data for direct marketing purposes.
- **Request erasure of Your Personal Data.** You have the right to ask Us to delete or remove Personal Data when there is no good reason for Us to continue processing it.
- **Request the transfer of Your Personal Data.** We will provide to You, or to a third-party You have chosen, Your Personal Data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which You initially provided consent for Us to use or where We used the information to perform a contract with You.
- **Withdraw Your consent.** You have the right to withdraw Your consent on using your Personal Data. If You withdraw Your consent, We may not be able to provide You with access to certain specific functionalities of the Service.

C. Exercising of Your GDPR Data Protection Rights

You may exercise Your rights of access, rectification, cancellation and opposition by contacting Us. Please note that we may ask You to verify Your identity before responding to such requests. If You make a request, We will try our best to respond to You as soon as possible.

You have the right to complain to a Data Protection Authority about Our collection and use of Your Personal Data. For more information, if You are in the European Economic Area (EEA), please contact Your local data protection authority in the EEA.

D. Sources of Personal Information

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

- **Directly from You.** For example, from the forms You complete on our Service, preferences You express or provide through our Service.
- **Indirectly from You.** For example, from observing Your activity on our Service.
- **Automatically from You.** For example, through cookies We or our Service Providers set on Your Device as You navigate through our Service.
- **From Service Providers.** For example, third-party vendors to monitor and analyze the use of our Service, or other third-party vendors that We use to provide the Service to You.

CCPA/CPRA Privacy

This privacy notice section for California Consumers under CCPA/CPRA and supplements the information contained in Our Privacy Policy and further explains required disclosures about how we collect, disclose, and sell the personal information of California consumers and the rights that California consumers may have under the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 ("CCPA/CPRA") where we act as a business under CCPA/CPRA. When we use the term "personal information" in this California Statement, we are using the term as CCPA/CPRA defines it, which generally means 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. However, personal information does not include publicly available, deidentified, or aggregate consumer information (which are all defined in CCPA/CPRA).

California law requires we restate some of the information from our privacy policy for specific categories that are defined in CCPA/CPRA. The type of personal information we collect and how we handle that personal information, including if we share or sell that personal information, depends on how you are specifically interacting with us and which Services you are inquiring about. This does not mean that all examples of that category of personal information were in fact collected by Us but reflects our good faith belief to the best of our knowledge that some of that information from the applicable category may be and may have been collected. For example, certain categories of personal information would only be collected if You provided such personal information directly to Us. In general, we have collected, disclosed for a business purpose, and sold the following categories of personal information and sensitive personal information from California consumers within the last twelve (12) months;

A. Categories of Personal Information Collected with Examples as Defined in CCPA/CPRA

- **Category A: Identifiers.**
Examples: A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, driver's license number, passport number, or other similar identifiers.
Collected: Yes.
- **Category B: Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).**
Examples: A 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. Some personal information included in this category may overlap with other categories.
Collected: Yes.
- **Category C: Protected classification characteristics under California or federal law.**
Examples: Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).
Collected: No.
- **Category D: Commercial information.**
Examples: Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
Collected: Yes.
- **Category E: Biometric information.**
Examples: 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.
Collected: No.
- **Category F: Internet or other similar network activity.**
Examples: Browsing history, search history, information on consumer's interaction with a website, application, or advertisement.
Collected: Yes.
- **Category G: Geolocation data.**
Examples: Approximate physical location or movements
Collected: No.
- **Category H: Sensory data.**
Examples: Audio, electronic, visual, thermal, olfactory, or similar information.
Collected: No.

- **Category I: Professional or employment-related information.**
Examples: Current or past job history or performance evaluations.
Collected: Yes.
- **Category 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)).**
Examples: 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.
Collected: No.
- **Category K: Inferences drawn from other personal information.**
Examples: Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
Collected: No.
- **Category L: Sensitive personal information.**
Examples: Social security, driver's license, state identification card, or passport number; user name, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic origin; religious or philosophical beliefs; union membership; genetic data; contents of consumer's mail, email, and text messages unless; processing of biometric information for the purpose of uniquely identifying a consumer; and personal information collected and analyzed concerning a consumer's health, sex life, or sexual orientation. **Sensitive personal information is collected only where necessary (e.g., payment/credential security) and is not used for profiling or targeted advertising.** Collected: Yes

B. Use of Personal Information for Business Purposes or Commercial Purposes

We may use or disclose personal information We collect for "business purposes" or "commercial purposes" (as defined under the CCPA/CPRA), which may include the following examples:

- To operate our Service and provide You with our Service.
- To provide You with support and to respond to Your inquiries, including to investigate and address Your concerns and monitor and improve our Service.
- To fulfill or meet the reason You provided the information. For example, if You share Your contact information to ask a question about our Service, We will use that personal information to respond to Your inquiry.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to You when collecting Your personal information or as otherwise set forth in the CCPA/CPRA.
- For internal administrative and auditing purposes.
- To detect security incidents and protect against malicious, deceptive, fraudulent or illegal activity, including, when necessary, to prosecute those responsible for such activities.

Please note that the examples provided above are illustrative and not intended to be exhaustive. For more details on how we use this information, please refer to the "Use of Your Personal Data" section.

If We decide to collect additional categories of personal information or use the personal information We collected for materially different, unrelated, or incompatible purposes We will update this Privacy Policy.

C. Disclosure of Personal Information for Business Purposes or Commercial Purposes

We may use or disclose and may have used or disclosed in the last twelve (12) months the following categories of personal information for business or commercial purposes:

- Category A: Identifiers
- Category B: Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))
- Category F: Internet or other similar network activity

Please note that the categories listed above are those defined in the CCPA/CPRA. This does not mean that all examples of that category of personal information were in fact disclosed, but reflects our good faith belief to the best of our knowledge that some of that information from the applicable category may be and may have been disclosed.

When We disclose personal information for a business purpose or a commercial purpose, We enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

D. Sale of Personal Information

As defined in the CCPA/CPRA, “sell” and “sale” mean selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s personal information by the business to a third party for valuable consideration. This means that We may have received some kind of benefit in return for sharing personal information, but not necessarily a monetary benefit.

Please note that the categories listed below are those defined in the CCPA. This does not mean that all examples of that category of personal information were in fact sold, but reflects our good faith belief to the best of our knowledge that some of that information from the applicable category may be and may have been shared for value in return.

Whether a disclosure constitutes a “sale” or “sharing” is determined under applicable law. Where required, We provide consumers the right to opt out of the sale or sharing of Personal Data and targeted advertising.

- Category A: Identifiers
- Category B: Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))
- Category F: Internet or other similar network activity

E. Share of Personal Information

We may share Your personal information identified in the above categories with the following categories of third-parties:

- Service Providers
- Our affiliates
- Our business partners
- Third-party vendors to whom You or Your agents authorize Us to disclose Your personal information in connection with products or services We provide to You

F. Sale of Personal Information of Minors Under 16 Years of Age

We do not knowingly collect personal information from minors under the age of 16 through our Service, although certain third-party websites that we link to may do so. These third-party websites have their own terms of use and privacy policies and we encourage parents and legal guardians to monitor their children’s Internet usage and instruct their children to never provide information on other websites without their permission.

We do not sell the personal information of Consumers We actually know are less than 16 years of age, unless We receive affirmative authorization (the “right to opt-in”) from either the Consumer who is between 13 and 16 years of age, or the parent or guardian of a Consumer less than 13 years of age. Consumers who opt-in to the sale of personal information may opt-out of future sales at any time. To exercise the right to opt-out, You (or Your authorized representative) may submit a request to Us by contacting Us.

If You have reason to believe that a child under the age of 13 (or 16) has provided Us with personal information, please contact Us with sufficient detail to enable Us to delete that information.

G. Your Rights under the CCPA/CPRA

If you are a California consumer, you may have one or more of the following rights under CCPA/CPRA:

- Right to confirm we process your personal information and, if so, to request we disclose to you: (1) the categories of personal information we collected about you; (2) the categories of sources from which the personal information is collected; (3) the business or commercial purpose for collecting, selling, or sharing personal information; (4) the

categories of third-parties to whom we disclose personal information; and (5) the specific pieces of personal information we have collected about you.

- Right to access (which may include a portable copy), correct, complete, or delete specific pieces of personal information we hold about you.
- Right to limit our use and disclosure of your sensitive personal information.
- Right to opt-out of the sale of personal information, as sale is defined under CCPA/CPRA.
- Right to opt-out of the sharing of personal information, as sharing is defined under CCPA/CPRA.
- Right not to receive discriminatory treatment for exercising your rights under CCPA/CPRA
- Additionally, California Civil Code Section 1798.83 may permit you the right to request information regarding the personal information about you we disclose to third-parties for the third-parties' direct marketing purposes.

H. Exercising Your CCPA/CPRA Data Protection Rights

In order to exercise any of Your rights under the CCPA/CPRA, and if You are a California consumer, You can contact Us:

- By email: mdeming@hi-rel.net

Only You, or a person registered with the California Secretary of State that You authorize to act on Your behalf, may make a verifiable request related to Your personal information.

Your request to Us 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 the required information if we cannot:

- Verify Your identity or authority to make the request
- And confirm that the personal information relates to You

We will disclose and deliver the required information free of charge within 45 days of receiving Your verifiable request. The time period to provide the required information may be extended once by an additional 45 days when reasonably necessary and with prior notice.

Any disclosures We provide will only cover the 12-month period preceding the verifiable request's receipt.

For data portability requests, We will select a format to provide Your personal information that is readily usable and should allow You to transmit the information from one entity to another entity without hindrance.

XII. Do Not Sell My Personal Information

Where applicable law provides a right to opt out of the sale or sharing of Personal Data or targeted advertising, You may exercise that right by contacting Us or using any opt-out mechanism made available through the Service.

Our analytics or advertising providers may use cookies or similar technologies as described in this Policy. Where those activities constitute sale, sharing, or targeted advertising under applicable law, We provide applicable opt-out rights.

Please note that any opt out is specific to the browser You use. You may need to opt out on every browser that You use.

XIII. Website

You can opt out of receiving ads that are personalized as served by our Service Providers by following our instructions presented on the Service:

- The NAI's opt-out platform: <http://www.networkadvertising.org/choices/>
- The EDAA's opt-out platform <http://www.youronlinechoices.com/>
- The DAA's opt-out platform: <http://optout.aboutads.info/?c=2&lang=EN>

The opt out will place a cookie on Your computer that is unique to the browser You use to opt out. If you change browsers or delete the cookies saved by your browser, You will need to opt out again.

XIV. Mobile Devices

Your mobile device may give You the ability to opt out of the use of information about the apps You use in order to serve You ads that are targeted to Your interests:

- “Opt out of Interest-Based Ads” or “Opt out of Ads Personalization” on Android devices
- “Limit Ad Tracking” on iOS devices

You can also stop the collection of location information from Your mobile device by changing the preferences on Your mobile device.

XX. Children’s Privacy

Our Service does not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 13 without verification of parental consent, We take steps to remove that information from Our servers.

If We need to rely on consent as a legal basis for processing Your information and Your country requires consent from a parent, We may require Your parent’s consent before We collect and use that information.

XXI. Links to Other Websites

Our Service may contain links to other websites that are not operated by Us. If You click on a third-party link, You will be directed to that third-party’s site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

XXII. Changes to this Privacy Policy

We may update Our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page.

We will let You know via email and/or a prominent notice on Our Service, prior to the change becoming effective and update the “Last updated” date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

XXIII. Contact Us

If you have any questions about this Privacy Policy, You can contact us:

- By email: mdeming@hi-rel.net