

# Privacy Policy

Last Updated: March 1, 2022

Sam A. Lupo & Sons, Inc. ("**Company**" or "**We**"), on its own behalf and on behalf of its affiliates and subsidiaries, respects your privacy and is committed to protecting your privacy through compliance with this policy. This Privacy Policy ("**Policy**") discloses the Company's practices concerning personal information we obtain about you by and through your use of the Company's websites, including its Facebook page and other social media accounts.

This Policy also notifies you of: (i) what personal information of yours is collected when you access and/or use the Company's websites or those of its affiliates and subsidiaries; (ii) how the information is collected; (iii) how the information is used and shared; (iv) our efforts to maintain the security of personal information; (e) our compliance with applicable data privacy regulations; and (f) other details concerning your personal information.

This Policy does not apply to: (i) the practices of entities that the Company does not own or control, or to people that we do not employ or manage; or (ii) information we collect or through any other means, including on any other website operated by any third party. Information contained in this Policy may be changed or updated without notice at any time.

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 websites. By accessing or using our websites, you agree to this Policy. Your continued use of our websites after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

**Information We Collect About You and How We Collect It.** We collect several types of information from and about users of our websites, including information:

- by which you may be personally identified, such as name, postal address, e-mail address, telephone number, and any other information which can reasonably be defined as personal or personally identifiable information under applicable law ("**personal information**");
- that is about you but may not identify you individually; and/or
- about your internet connection, the equipment you use to access our websites and usage details.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the site. Information collected automatically may include information about your internet connection and the equipment you use to access our websites, including your operating system, browser type and usage details, IP addresses, traffic data, location data, logs, and other communication data and the resources that you access and use on our websites, as well as your IP address and information collected through cookies, web beacons, and other tracking technologies.

- From third parties, for example, our business partners.

**Information You Provide to Us.** The information we collect on or through our websites may include:

- Information that you provide by filling in forms on our websites. We may also ask you for information, for example, when you enter a contest or promotion sponsored by us, and/or when you report a problem with any of our websites.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Details of transactions you carry out through our websites and of the fulfillment of your orders. You may be required to provide financial information before placing an order through our websites.
- Your search queries on our websites.

You also may provide information to be published or displayed (hereinafter, "**posted**") on public areas of our websites, or transmitted to other users of our websites or third parties (collectively, "**User Contributions**"). Those users wishing to post to our websites may be required to register or otherwise provide personal information, and if a user chooses not to register or otherwise provide personal information, such user may not have access to those areas, services or products which require registration or provision of personal information. Your User Contributions are posted on and transmitted to others at your own risk. Please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of our websites 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 websites, 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 websites, including traffic data, location data, logs, and other communication data and the resources that you access and use on our websites.
- 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 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 websites. 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 websites.

- **Flash Cookies.** Certain features of our websites may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our websites. Flash cookies are not managed by the same browser settings as are used for browser cookies.
- **Web Beacons.** Areas of our the websites and our e-mails 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 certain website content and verifying system and server integrity).

### **Third-Party Use of Cookies and/or Other Tracking Technologies.**

Some content or applications, including advertisements, on the websites may be served by third-parties, including advertisers, advertising 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.

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

The information we collect may include personal information, and/or we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It generally helps us, or may help us, improve our websites and to deliver a better and more personalized service, including by enabling us to:

- To present our websites and their contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your account.
- Estimate our audience size and usage patterns.
- Build features that will make our websites easier to use. This increased ease of use may include faster search requests and results, better user support and timely notice of new services, products and special offers.
- Improve our marketing and promotional efforts, improve our content and product offerings, and customize our websites' layouts and services.
- Resolve disputes, troubleshoot problems and enforce our Terms and Conditions of Use.

- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our websites or any products or services we offer or provide through our websites.
- To enable you to participate in interactive features on our websites.
- In any other way we may describe when you provide the information.
- 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 send us an email stating your request to [sam@spiedies.com](mailto:sam@spiedies.com)

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.

### **Disclosure of 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 the Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held about our websites' users is among the assets transferred.
- To third parties to market their products or services to you if you have not opted out of these disclosures. If you do not want us to use your information in this way, please send us an email stating your request to [sam@spiedies.com](mailto:sam@spiedies.com)
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

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 and Conditions of Use, our Standard Terms and Conditions of Sale, and/or the terms of any agreement entered between the Company and any entity or individual, including but not limited to users of our websites.
- For billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, its subsidiaries and affiliates, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

### **Your California Privacy Rights**

California Civil Code Section § 1798.83 permits users of our websites that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to [sam@spiedies.com](mailto:sam@spiedies.com) or write us at: PO Box 5721 Endicott NY 13763.

### **Children Under the Age of 13**

Our websites are not intended for children under 13 years of age. No one under age 13 may provide any personal information to or on our websites. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on our websites or on or through any of our websites' features, make any purchases through our websites, use any of the interactive or public comment features of our websites 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 13 without parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at please call us at 800.388.5352 send an email to [sam@spiedies.com](mailto:sam@spiedies.com) or write us at: PO Box 5721 Endicott NY 13763.

### **Data Security**

Where we have given you (or where you have chosen) a password for access to certain parts of our websites, 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 websites like message boards. The information you share in public areas may be viewed by any user of the websites.

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 websites. 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 websites.

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

It is our practice to post any changes we make to this Policy on this page. The date the Policy was last revised appears at the top of this page.

**Contact Information**

To ask questions or comment about this Policy and our privacy practices, contact us at:

Sam A Lupo and Sons Inc

PO Box 5721 Endicott NY 13763

[sam@spiedies.com](mailto:sam@spiedies.com)