

# PRIVACY POLICY

Cornerstone Controls Inc. ("Cornerstone," "We," "Us," or "Our") provides this Privacy Policy ("Privacy Policy") to describe the types of Personal Information (defined below) on or through the website located at [www.cornerstonecontrols.com](http://www.cornerstonecontrols.com) (the "Website"), how we use the information, with whom we share it, and the choices you can make about our collection, use and disclosure of your Personal Information. This Privacy Policy is subject to our Terms of Use, found at [www.cornerstonecontrols.com](http://www.cornerstonecontrols.com), which is incorporated herein by reference. This Privacy Policy also applies to any website or service that specifically references this Privacy Policy. The phrase "Personal Information" refers to information that personally identifies you, such as your name, address, telephone number, email address. We also describe the measures we take to protect the security of your Personal Information and how you can contact us about our privacy practices. When you visit the Website or provide us with information, you consent to our use and disclosure of the information we collect or receive as described in this Privacy Policy.

Please review this Privacy Policy periodically as we may update it from time to time without prior notice to reflect changes in our data practices.

## 1. Type of Information We Collect

We collect information about visitors to the Website in order to provide an experience that is responsive to our visitors' needs. We may also collect Personal Information that you give to us in any other way. We may collect Personal Information from you in connection with:

- i. Your purchase of goods and services from us,
- ii. Your use of our goods and services.
- iii. fulfilling information requests,
- iv. your completion of forms on the Website, including, registering to use our Website, subscribing to our newsletter, posting material, or requesting further information, products, or services, and/or
- v. responding to communications from us (e.g., surveys, promotional offers, or service requests).

We collect such information only with your knowledge. The types of Personal Information that we collect may include your name, home and work e-mail addresses, telephone and fax numbers, date of birth, gender, and lifestyle information (i.e., preferences, names and ages of children) and other information that may be necessary or useful to the provisions of our goods and services to you. We may also collect browsing history information (i.e., IP addresses, domains, browser type and version, and operating system), aggregated data relative to your use of the Website and responses to promotional offers and surveys, and information about the products and services you purchase from us and your use of the same.

## 2. Collection of Information

We collect information via the Website that you voluntarily provide to us, for example, by completing online forms or e-mailing us. You will always be given the choice not to submit your Personal Information

or to decide what communications you want to receive from us. In addition, we use various web tools such as cookies, web beacons, and other technology that are sent to and stored on your hard drive. These tools will automatically collect and log web usage data from you when you visit the Website. Information, including your IP address, referring website, pages viewed, and length of visit, informs us about how you use and navigate the Website and helps us monitor, customize, and enhance your experience on the Website. Such usage information is not Personal Information unless it is associated with other information by which you can be personally identified. Most browsers are initially set to accept cookies. You can set your browser to notify you when you have received a cookie, giving you the opportunity to decide whether to accept it.

In particular, we use Google Analytics (“Google Analytics”), a web analytics service provided by Google, Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA as our processor. Google Analytics uses cookies to help us analyze how the Website is used, including the number of visitors, the websites visitors have come from, and the pages they visit. This information is used by us to improve the Website. To opt out from data collection by Google Analytics, you can download and install a browser add-on, which is available [here](#).

You have the option to reject our cookies and still use our the Website, but you may not be able to access or use some of the features we offer on the Website.

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 the 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](#).

### **3. Use and Disclosure of Information**

We are fully committed to providing you with information about the collection and use of Personal Information furnished by, or collected from, those using the Website, our products, and services. It is our practice not to ask you for Personal Information unless we need it or intend to use it. Some of the primary purposes for collecting your Personal Information are as follows:

- Provide you with functionality of the Website;
- Administer and manage Cornerstone;
- Provide client services, products, and/or marketing products or services;
- Conduct research and perform analysis to measure, maintain, protect, develop, and improve our products or services;

- Administer, enhance, and communicate with you regarding Cornerstone's events, marketing, and advertising; and/or
- Make communications necessary to notify you regarding order confirmations, products, services, market research, requests, marketing, security, privacy, and administrative issues.
- 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 applicable law.
- 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 information held by us is among the assets transferred.

As a general practice, however, we do not sell, rent, or provide your Personal Information to unaffiliated third parties. Unless specifically noted herein, other situations in which we may disclose your information to unaffiliated third parties shall be limited to:

- When we have received your consent to do so;
- In situations where sharing or disclosing your information is required in order to offer or provide you products or services you desire;
- When companies or service providers that perform business activities on behalf of us require such information (e.g., credit card processing, customer support services, market research administration or database management services) and/or such companies or service providers may have independent rights to your Personal Information if you disclose your Personal Information to them on a website governed by their privacy policy;
- to facilitate business operations or meet contractual obligations;
- In the event we are merged or acquired by another owner/company; and/or
- In case of emergency (i.e., to safeguard the life, health, or property of an individual).

In addition to the circumstances described above, we may disclose information:

- i. if required to comply with law or court order, or as requested by other government or law enforcement authority;
- ii. in the good faith belief that disclosure is otherwise necessary or advisable including, without limitation, to protect our rights;
- iii. when we have reason to believe that disclosing the information is necessary to identify, contact or bring legal action against someone who may be causing interference with our rights, whether intentionally or otherwise; and/or
- iv. when anyone else could be harmed by such activities.

If your Personal Information is shared as mentioned above, we seek to limit the scope of information that is furnished to the extent necessary for the performance of the specific function. Unless otherwise precluded by law, we require third parties to agree to protect your Personal Information, abide by applicable privacy laws and regulations, and we grant to such third parties no independent rights to the Personal Information. We may use aggregated, non-personally identifiable information for purposes of:

- i. website administration and
- ii. to compile information about usage of the Website and our products and services. We may share aggregated information (which does not contain your Personal Information) with third parties (i.e., advertisers and marketing partners).

#### **4. Access to and Review of Personal Information**

To ensure that your Personal Information is accurate and up to date, we encourage you to regularly review and update your information as appropriate. To protect your privacy and security, we may take reasonable steps to verify your identity before we disclose or make any corrections to such information. If, upon review, you wish to deactivate your profile, or update your Personal Information, we will endeavor to do so in a timely manner. Occasionally, information that you request to be removed will be retained in certain files for a period of time in order to properly resolve disputes or to troubleshoot problems. In addition, some types of information may be stored indefinitely on "back up" systems or within log files due to technical constraints or financial or legal requirements. Therefore, you should not always expect that all of your Personal Information will be completely expunged from our databases in response to your request.

#### **5. Ability to Opt Out**

You can let us know that you do not wish to receive information about new products and services and special offers from us, or that you do not wish to have us share your Personal Information with trusted third parties (other than to the extent necessary to fulfill your request for products or services), by contacting us at [contactus@cornerstonecontrols.com](mailto:contactus@cornerstonecontrols.com) or in the manner provided in every commercial email sent by us.

#### **6. Security Safeguards**

We recognize the importance of information security, and we are constantly reviewing and enhancing our security procedures. The Website and our servers have reasonable physical, technical, and administrative security measures in place to help protect your Personal Information against loss, misuse, and alteration while under our control. However, you should be aware that no transmission of data over the Internet is guaranteed to be completely secure, and we cannot guarantee the security of any information you provide to us.

#### **7. Links to Other Websites**

The Website may provide links to other websites for your convenience and information. Third party websites that are accessed through links on the Website have separate privacy and data collection practices and security measures. We have no responsibility or liability for the practices, policies, and security measures implemented by third parties on their websites. We encourage you to contact them to ask questions about their privacy practices, policies and security measures before disclosing any personally identifiable information.

#### **8. Minors**

Our Sites are not directed towards minors, and we do not knowingly collect Personal Information from minors. While we do not seek to obtain, nor wish to receive, Personal Information directly from minors, we cannot always determine the age of persons who access and use our Sites. If a minor provides us with his/her data without parental or guardian consent, we encourage the parent or guardian to contact us to have this information removed from our systems.

## **9. California Consumer Privacy Rights**

California residents may have additional rights with respect to their Personal Information. For information relating to these rights, please view our Privacy Notice for California Residents, accessible at [www.cornerstonecontrols.com](http://www.cornerstonecontrols.com).

## **10. Contact Us**

If you have any questions about our Privacy Policy or this Website, you may contact:

[contactus@cornerstonecontrols.com](mailto:contactus@cornerstonecontrols.com)

513-489-2500

7131 E. Kemper Road  
Cincinnati, OH 45249

## **11. Updates to the Privacy Policy**

We may amend this Privacy Policy from time to time, without notice to you, in order to meet changes in the regulatory environment, business needs, or to satisfy the needs of our visitors, properties, strategic marketing partners, and service providers. Updated versions will be posted to the Website and the "last updated" date at the bottom of this Privacy Policy will be revised so that you are always aware of when the Privacy Policy was last updated. If we materially change how we use your Personal Information, we will notify you and request your consent before using the Personal Information in a different manner.

Last Updated: March 16, 2020.

# Privacy Notice for California Residents

This Privacy Notice was last updated on 3/16/2020.

This Privacy Notice for California Residents ("Privacy Notice") supplements the information contained in our Privacy Policy, accessible at [www.cornerstonecontrols.com](http://www.cornerstonecontrols.com), and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). Cornerstone Controls Inc.

("Cornerstone," "We," "Us," or "Our") adopts this notice to comply with the California Consumer Privacy Act of 2018 ("CCPA") and other California privacy laws

## Your Rights and Choices

The CCPA provides California consumers specific rights concerning their personal information, including, the right to request that we disclose what personal information we collect, use, disclose, and sell. This Section describes your rights and how you may exercise those rights as well as describes how we and third parties handle your personal information.

You or your authorized agent can request: 1) a disclosure of your personal information we collect, use, disclose, or sell; 2) to delete your personal information we collect, or maintain; and 3) to opt-out of the sale of your personal information. If you choose to submit a request through an authorized agent, we will require proof that the authorized agent has your written permission to submit a request on your behalf. Additionally, we may require you to verify your identity with us through the verification process detailed below.

If you choose to exercise these rights, we will not discriminate against you because of it. However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and will be described to you in writing. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

## Requests to Know and Requests to Delete

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 categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you.
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - sales, identifying the personal information categories that each category of recipient purchased; and
  - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

You also 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 to delete, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

You may submit a request to know or request to delete, free of charge, online through our main office number 513-489-2500. Note that for requests to delete, we will require you to separately confirm that you want your personal information deleted. To verify your identity, we require you provide your name and email or your email. For some requests, we may also require you to sign a declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request. Once submitted, you will receive an email within 10 days that we will use to verify your identity and provide confirmation of your request. We will respond to your request to know or request to delete within 45 days from the day we receive the request. If necessary, we may extend the time period to a maximum total of 90 days from the day we receive the request. In such case, you will receive an email notifying you of the extension and explaining the reason for the extension. Any disclosure in response to a request to know will cover the 12-month period preceding the business's receipt of the request and will be delivered in a readily useable format, by mail or electronically at the consumer's option.

Your request to know or request to delete may be denied for any reason allowable under the CCPA. For example, 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.
- 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 or any other purpose permitted by the CCPA.

Similarly, we may deny requests:

- For specific pieces of personal information if the disclosure creates a substantial, articulable, and unreasonable risk to the security of that personal information, your account with us, or the security of our systems or networks.
- To access or delete information that is de-identified.
- If your identity cannot be verified to a degree of certainty required by the CCPA.
- From an authorized agent that does not submit proof that they have been authorized by the consumer to act on the consumer's behalf.

## **Requests to Opt-Out**

If you are 16 years of age or older, you have the right to opt-out from a sale of your personal information. We do not sell the personal information of consumers we actually know are less than 18 years of age, unless we receive affirmative authorization (the "right to opt-in") from the parent or guardian of a consumer less than 18 years of age. Consumers who opt-in to personal information sales may opt-out of future sales at any time.

To exercise the right to opt-out, you may submit a request through our main office number at 513-489-2500. We will act upon your request no later than 15 days from the date we received the request. Note that we may deny a request to opt-out if we have a good-faith, reasonable, and documented belief that the request is fraudulent. Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back in to personal information sales at any time.

## **Collection of Personal Information**

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer (“personal information”). In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

<u>Category</u>	<u>Examples</u>	<u>Collected</u>
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	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.	YES
C. Protected classification characteristics under California or federal law.	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).	NO
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes – but company purchases not individual
E. Biometric information.	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.	NO
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.	NO

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

- Directly from you or your agent.
- Indirectly from you or your agent. For example, through cookies and other automated technologies.
- Directly and indirectly from activity on the Website.

## Use of Personal Information

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

- Provide you with functionality of the Website;
- Administer and manage Cornerstone;
- Provide client service and/or marketing products or services;
- Conduct research and perform analysis to measure, maintain, protect, develop, and improve our products or services;
- Administer, enhance, and communicate with you regarding Cornerstone' events, marketing, and advertising; and/or
- Make communications necessary to notify you regarding order confirmations, products, services, market research, requests, marketing, security, privacy, and administrative issues.
- 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 or other applicable law.
- 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 information held by us is among the assets transferred.

## Sharing Personal Information

In the preceding 12 months, we have disclosed and/or sold personal information to third parties for a commercial or business purpose, as authorized under applicable law. We do not sell the personal information of minors under 18 years of age without affirmative consent. In the preceding twelve (12) months, we have disclosed and sold the following categories of personal information for a business purpose:

Category A: Identifiers.  
Category B: California Customer Records personal information categories.  
Category D: Commercial information.  
Category F: Internet or other similar network activity.  
Category G: Geolocation data.

We disclose and sell your personal information for a business purpose to the following categories of third parties:

- Our affiliates and subsidiaries.
- Vendors, consultants, and suppliers.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

## Contact Us

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[contactus@cornerstonecontrols.com](mailto:contactus@cornerstonecontrols.com)

513-489-2500

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Cincinnati, OH 45249

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