

Privacy Policy for Willmann-Bell, Inc.

Last Updated: **June 7, 2018**

1. Introduction

Your privacy is a serious matter to us. Please take a few minutes to read this Privacy Policy (“Privacy Policy”) so that you understand how we treat your information. This Privacy Policy explains what information we collect from you, how we use such information and with whom it may be shared, and your rights and choices with regard to controlling your information when you make a purchase from Willmann-Bell, Inc. This Privacy Policy only applies to the information collected, used and disclosed by Willmann-Bell, Inc.

The collection and use of your information as described in this Privacy Policy is based on your voluntary consent or on our contractual obligations to you or legitimate interest. If you do not agree with this Privacy Policy, please do not purchase our products.

2. Information We Collect About You

We collect personal information only when you place and order with us, when you register one of our software products or when you explicitly request that we include you in our email notification list.

- Your name
- Your physical address in sufficient detail to insure physical delivery of purchased merchandise.
- Your email address to enable us to inform you that your order has been received and notice of tracking numbers when the product is shipped. Further, if you do not opt out to receive occasional notices of special offers and/or software updates.
- Your telephone number to be used if we need to get in contact with you in regards to your order.
- What you purchased.
- Your IP address.

3. How We Use Information

Note that the legal bases outlined below are required to be included under EU data protection laws, but are not required to be included if you do not reside in the EU:

- **To fulfill our contractual with you anticipation of entering into an agreement with you,**
 - To provide any products that you purchase;
 - To enforce your legal rights under an agreement; and
 - To provide pro-forma invoices for the cost of our products.
- **To meet and fulfill our legitimate business interests, including:**
 - To market and promote our products, including promotions and other initiatives and sending marketing e-mails and correspondence;

You can withdraw your consent at any time by following the steps in Section 5 of this Privacy Policy.

- **To comply with our regulatory or legal obligations, to enforce our legal rights or comply with legal processes, including:**

- To detect and prevent fraud or infringement of our or any third party's rights;
- To meet reporting requirements (e.g. filing tax forms);
- To retain documents and information related to a legal action; and
- To report data breaches.

4. Information We Share With Third Parties

We take your privacy seriously and will not share your Information with others except in the following circumstances:

- **Pursuant to Law, Rule or Regulation:** We may share or disclose your Information when we believe in good faith that we are lawfully authorized or required to do so or that doing so is reasonably necessary or appropriate to comply with the law or legal processes. Examples of these purposes include: to respond to requests from public, governmental, legal and regulatory authorities, to comply with court orders, to obtain legal remedies or limit our damages, to enforce this Privacy Policy or the Terms of Use, to protect against fraud or for risk management purposes, and to protect the rights, safety and/or property of you, our employees or others.
- **Corporate Transactions or Events:** We may disclose your Information in connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition, or in any other situation where Information may be disclosed or transferred as one of our business assets.

5. Rights and Choices Regarding Information (e.g. Opting Out; Disabling Certain Features)

At times, you may be presented with the option to “opt-in” to receiving certain marketing and promotional communications or other information from us that we think will be of interest to you. Recipients of such communications can unsubscribe or “opt-out” by following the specific instructions included in such communications.

6. Retaining Your Personal Information

We access, retain, store and use Personal Information for the least amount of time necessary pursuant to our relationship with you in accordance with our data retention policies and applicable law. We do not collect more Personal Information than is necessary to fulfill our obligations to you or at law or for the purposes stated in this Privacy Policy.

7. Security

We maintain and have implemented security safeguards to protect the Personal Information submitted to and collected, used and stored by us, both during transmission and once we receive it. However, no method of transmission over the Internet or via mobile device, or method of electronic storage, is 100% secure – so we cannot guarantee its absolute security.

Willmann-Bell, Inc. will not be responsible for any actual or consequential damages that result from a lapse in compliance with this Privacy Policy because of a technical malfunction or a breach in security.

9. Our Policy Regarding Children

Our Sites and Services are not directed to children under the age of 16. We do not knowingly collect Information from children under the age of 16. If you are under the age of 16, you may not use the Services, including registering for or providing any information about yourself to or in connection with the Services. If we obtain actual knowledge that we have collected Personal Information from someone under the age of 16, we will promptly delete it, unless we are legally obligated to retain such data. If you believe that we have mistakenly or unintentionally collected information from someone under the age of 16, please contact us at

<http://www.willbell.com/ContactUsByEmail/?AspxAutoDetectCookieSupport=1>. For users in the United States, please also visit <http://www.ftc.gov/bcp/edu/pubs/consumer/tech/tec08.shtm> for information from the Federal Trade Commission about protecting children's privacy online.

10. International Transfers of Personal Information

Our operations are supported by a network of computers, cloud-based servers, and other infrastructure and information technology, including, but not limited to, third-party service providers. We and some of our servers, vendors and service providers may not be located in your jurisdiction and may also be located outside of the European Economic Area ("EEA") and Switzerland. Please note that such transfers may also be necessary in order to perform our obligations under a contract with you, to fulfill a request made by you, to meet a legal or regulatory obligation and/or through obtaining your express consent.

11. Privacy Policy Changes

From time to time, we may modify this Privacy Policy to reflect industry initiatives, third party requirements or changes in the law, technology, our information collection and use practices or the features and functionality of the Services, and such modifications shall be effective upon posting. If we materially change our Privacy Policy, we will notify you of such changes by posting them on our website willbell.com or by sending you an email or other notification. Your continued use of the Services after we post a revised Privacy Policy (and, where appropriate, notify you of same) signifies your acceptance of the revised Privacy Policy. It is therefore important that you review this Privacy Policy regularly to ensure you are updated as to any changes. We may continue to process your Information based on our legitimate interests or in order to fulfill our obligations under a contract and/or may also seek your affirmative consent to the terms of the updated Privacy Policy. For example, we may ask for your consent before implementing new uses of the Personal Information that we have already collected from you based on such consent, if such new use was not addressed by the privacy policy under which such information was collected or if our legal basis for processing such information changes.

12. Accuracy

It is your responsibility to give us current, complete, truthful and accurate information when placing an order with us. We cannot and will not be responsible for any problems or liability that may arise if you do not give us accurate, truthful or complete Information. We may reject or delete any Information or entry for any reason, including if we believe in good faith that the Information is false, fraudulent or inconsistent with this Privacy Policy.

If you have any questions, concerns, criticisms or feedback about our privacy practices or any of the terms or conditions of this Privacy Policy, please feel free to contact us via the below means. Although we urge you to contact us to find a solution for every concern you may have, you always have the right to lodge a complaint with your competent data protection authority.

Email: <http://www.willbell.com/ContactUsByEmail/?AspxAutoDetectCookieSupport=1>

OR

Mail: Willmann-Bell, Inc
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Richmond, VA 23235
USA