

Privacy Policy

Last Updated: March 25, 2024

Introduction.

We recognize that privacy is important to you. The purpose of this Privacy Policy (or “Policy”) is to describe the types of information Sellars Absorbent Materials, Inc. (“Sellars,” “we,” “us,” “Company” or similar terms) collects from you through your access and use of our e-commerce platform located at sellarscompany.com, when you interact with us, or communicate with us (collectively, the “Services”), how we share the information, and certain rights and options you have regarding your information. Portions of this website may describe additional privacy practices applicable to specific types of information collected or provided on particular web pages, and in such case apply only to that particular page or site.

By providing us with personal information or otherwise accessing or using the Services, you expressly consent to the information-handling practices described in this Policy. If you do not agree with this Policy, please do not use the Services or provide us with your information.

Important Information About This Policy

While we always aim to provide complete and transparent information about how we process your personal information, we reserve the right to amend or update this Policy from time to time or to create additional policies in order to accurately reflect changed circumstances or new legal requirements. As a result, it is important that you read this Policy closely so that you are fully aware of how and why we are using your personal information.

To assist us in ensuring that we can provide the most accurate information possible, we ask that you check this Policy for updates. We also ask that where we have an ongoing relationship with you and any of the data you have provided becomes no longer accurate that you keep us informed of this so we can amend our records accordingly. By providing us with personal information or using our Services, you expressly consent to the information-handling practices described in this Policy. If you do not agree with this Policy, please do not use our Services or provide us with your information.

What Information Do We Collect?

A. Personal Information

For the purposes of this Policy, “personal information” is any information that identifies, relates to, or can be used to contact a particular individual or household. The types of personal information we collect include the following categories.

- **Contact information** – first name, last name, email address (personal or business), mailing address (personal or business), billing address (personal or business), telephone number (personal or business), and employer and employment details.
- **Account information** – if you register to use our Services, your username, account password, account number, and other information that we may request or that you may provide relating to your account.
- **Transactional information** – details about your, or your company’s, transactions with us, including method of payment, payments received, payment details, transaction history, and other information relating to the services purchased by you or your company.

- **Financial information** – when your company purchases a product, your payment card and billing information.
- **Marketing information** – details regarding informational and promotional materials you may have requested or received from us, the products in which you are interested, your receipt of promotional communications, and information on your marketing or communication preferences.
- **Job applicant information** – if you submit an application for employment, we will collect the information that is typically included on a resume, such as your employment and job history, education history and credentials, references, and similar information.
- **Customer support information** – details of any communications or inquiries you submit to us, including technical or customer support requests, through email, calls, our software applications, or other features available in our Services.
- **Device and usage information** – details regarding how and when you use our Services, including the device used to connect to our Services, your IP address and device identifier, the frequency and duration of your usage, the pages you view, what websites or search terms referred you to our Services, and information about your interaction with our Services.

When you use this website, you may choose to provide us with information about yourself in a variety of different ways. And we may collect and combine this information with information you choose to provide off-line (such as when placing a telephone or catalog order and you provide us with your name and address). Some examples of when we collect information are when you:

- Sign up to receive email updates.
- Send us an email.
- Make an online, catalog, or telephone purchase from us.
- Request customer service.
- Submit a testimonial, product review, or other user-generated content that may be posted on the website, if any.
- Participate in a contest, sweepstake, promotion, or survey.
- Otherwise submit personal information to us.

Please note that we may aggregate or anonymize the foregoing types of data such that they are no longer capable of identifying you, in which case they are no longer considered “personal information.”

B. Automatically Collected Usage and Device Information

We automatically receive and store certain types of information when you interact with our websites, emails, and online advertising. Our purpose is to allow the websites to work correctly, to evaluate use of the website, and to support website analytics and marketing campaigns. Some examples include:

- **Cookies.** Cookies are small text files that a website transfers to a visitor’s device for recordkeeping purposes. We use cookies to personalize visitors’ experiences on our Services, provide content that we

believe may be of interest, track visitor trends and patterns, engage in marketing and advertising, and otherwise analyze our Services traffic. For further information about cookies, including how to refuse cookies, please visit www.allaboutcookies.org. Please note that if cookies are disabled, you may not be able to enjoy certain features of our Services.

- **Log Files and Device Identifiers.** We use log files to track actions occurring on the website and mobile application and collect data about visitors, including IP address, browser type, Internet service provider, referring/exit pages, date/time stamps, and device identifiers. This information is used for security purposes and to detect and prevent fraud.
- **Pixels, tags, and web beacons.** Sellars' website may also use "pixels," "tags," or "web beacons." These technologies are small pieces of code that run when a website/application page or email is loaded. They are used to monitor the behavior of the visitor or email recipient—such as what icons were clicked or whether links in an email were opened—and gather analytics. For example, when you open the Sellars homepage, a pixel may run and generate information based on the visit, and then this information is processed by us or our vendors. Pixels work in conjunction with cookies to let us know what portions of our website are of interest to you and to help us provide you with tailored information from our website. If you turn off cookies, the pixels, tags, and web beacons we use may still detect certain information about your interaction with our website and disregard any cookie-prohibitive markers or signals. Note, the vendors that supply us these pixels, tags, web beacons, cookies, or similar tracking technologies collect your personal information instantaneously and simultaneous to Sellars' collection of such information and they may use the information for their own purposes.
- **Analytics.** Our Services may also use third-party analytics tools, such as Google Analytics. You can find more information about how data is collected and processed in connection with the Google Analytics service [here](#). You can also read Google's privacy policy [here](#).

The information collected through these technologies may be combined with personal information. We may share information about your use of our Services with our advertising and analytics partners, who may combine it with other information that you previously provided to them.

C. Information from Other Sources

We may obtain both personal and non-personal information about you from affiliates, business partners, vendors, contractors, suppliers, and other third parties and add it to other information we have collected. For example, we may receive information about you from your employer who is a distributor of our products. We, and the third parties we engage, may combine information we collect from you over time, and across the Services, with information obtained from other sources. This helps us improve the information's overall accuracy and completeness, and also helps us better tailor our interactions with you.

D. Information from Social Media

If you interact with us on any social media platform: (i) depending on your social media privacy settings, the personal information that you submit on the social media platform may be read, collected, or used by us as described in this Policy, and (ii) where we respond to any interaction with you on social media, your account name/handle may be viewable by any and all members or users of our social media accounts. Social media platforms operate independently from us and we are not responsible for the personal information that you choose

to submit or link on any social media platform. We encourage you to review the privacy policies and settings of any social media platform with which you interact to help you understand their privacy practices.

How We Use Your Information

We (or the service providers acting on our behalf) use information about you to provide products and services to you, to promote our business, and to otherwise support our business. These include order or service fulfillment, internal business processes, marketing, authentication, loss and fraud prevention, public safety and legal functions. We use the personal information identified above for the following purposes:

- Negotiating, entering into, and managing our business relationship and agreements with our organizational partners and customers, including providing our products and services to and processing payments from our organizational partners and customers.
- To respond to an e-mail or request from you.
- To personalize the website for you.
- To administer surveys and promotions, if any.
- To provide you with information that we believe may be useful to you, such as information about products or services provided by us or other businesses.
- To perform analytics and to improve our products, websites, and advertising.
- To comply with applicable laws, regulations, and legal process.
- If you are a job applicant, to process your application, including to schedule interviews with you and engage in similar Human Resources functions.
- Enforcing our agreements with you or our organizational partners and customers, complying with our legal or regulatory obligations, and defending or advancing legal claims.
- To keep a record of our transactions and communications.
- Performing other functions as otherwise described to you at the time of collection or to which you otherwise consent.

We may use personal information to contact you, consistent with applicable law, through any contact information you provide through our websites, including any email address, telephone number, cell phone number, text message number, or fax number. You expressly consent to our use of all information provided by you to contact you by any applicable method.

Disclosure of Your Information

When the information we collect is aggregated, anonymized, or otherwise does not identify you, it is no longer considered “personal information.” We may use such information for any purpose or disclose it to third parties, to the extent permitted by applicable law.

We may disclose your personal information to the following types of third parties:

Service Providers and Vendors to Sellars.

We may disclose information about you to vendors and service providers that assist us with our business. For example, if you order a product to be shipped, we will share your name and address with the delivery service. Similarly, if you pay for an item with a credit card, we share information with the applicable financial institution(s) as necessary to process your transaction and to protect against fraud. We disclose information to other companies that help us improve our product and service offerings and our websites. We also disclose information to our professional advisors, such as lawyers, accountants, or similar advisors. Your personal information will be stored and processed by our service providers in the United States.

Marketing and Analytics Vendors

We may disclose your information to marketing and advertising vendors that may assist with lead generation, hosting information relating to customers and business partners and potential customers or business partners, marketing automation, advertisement placement and targeting, and marketing campaigns and communications, as well as analytics vendors in order to understand our Services traffic and usage patterns, optimize our Services, and identify potential new customers or users. Note, the technology vendors we use to make the Services available to you via the internet may collect your personal information, on our behalf, instantaneously and simultaneously with us collecting the same information.

Legal Requirements and Protection of Our Company and Others.

We may disclose your information in other special circumstances. These include situations when the sharing is necessary to protect the safety, property, or other rights of Sellars, our customers, our vendors, or any other person, or where otherwise required by law. Sellars may provide your personal information in response to a search warrant or other legal inquiry or order such as a subpoena, or to an investigative body in the case of a breach of an agreement or contravention of law, or as otherwise required by applicable law. We may disclose your information and cooperate with law enforcement authorities at our discretion.

Business Transfers.

We may transfer any information we have about you in connection with a merger or sale (including transfers made as part of insolvency or bankruptcy proceedings) involving all or part of Sellars and its assets, or as part of a corporate reorganization or stock sale or other change in corporate control or similar transaction.

Aggregate Information. We may de-identify and aggregate information regarding the use of our website. Once all identifying information about you has been removed and the information is anonymous, we may use or disclose such aggregate information without restriction.

Your Choices.

We respect your right to make choices about the ways we collect, use, and disclose your information. We try to offer you meaningful choices regarding your personal information. Some choices you have regarding personal information include the following.

- **Marketing Emails** – As required by applicable laws, you can opt-out of receiving promotional emails from us by clicking the “opt out,” “unsubscribe,” or similar link in any such promotional emails and following the instructions provided.
- **Cookies** – Depending on your browser or device, you may have the option to set the browser to accept all cookies, reject all cookies, notify you when a cookie is set, or delete cookies. Each browser and device are different, so we recommend you evaluate the tools and settings available in your browser or device, as

well as any available instructions for the same. Please note that if you disable or delete cookies, you may not be able to access or use certain features of the Services.

- **Google Analytics** – As discussed above, we use Google Analytics in connection with the Services. If you would like to refrain from having your data collected by Google Analytics, Google has developed an opt-out browser that you can [use](#). You can find more information on how Google uses information it collects [here](#).
- **Declining to Provide Information** – You can choose not to provide us with information we may request through our Services, but that may result in you being unable to use certain features of our Services, request information about our services, or initiate other transactions with us.
- **Do Not Track Mechanisms** – Please note that our Services does not honor “Do Not Track” signals, and such signals will not impact the operation of the Services.

In addition to the above, you may contact us using the details provided at the end of this Policy with any questions about the choices relating to your personal information.

Rights Afforded to Certain Individuals

A. California Residents

California Civil Code § 1798.83 (California’s Shine the Light Act) further permits California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. If you are a California resident, you may ask us to refrain from sharing your personal information with certain of our affiliates and other third parties for their direct marketing purposes. Please tell us your preference by contacting us at the contact information below.

B. Canadian Residents

If you reside in Canada, various Canadian laws, including Canada’s Personal Information Protection and Electronic Documents Act (“PIPEDA”), may provide you certain rights with respect to your personal information, including the right to request information about the collection, use, or disclosure of your personal information, to request access to your personal information, and to challenge the accuracy and completeness of your personal information and have it amended as appropriate.

If you are a Canadian resident and would like to make a request regarding your personal information, please send a request to customerservice@sellars.com with the subject line, “Canada Resident Request,” or otherwise contact us using the information in the “How to Contact Us” section below. We will attempt to respond to your request as quickly as possible but may ask you to provide additional information to enable us to locate the personal information or determine how it has been used or disclosed. We will provide you access, as appropriate, at minimal or no cost to you.

C. EU/UK Residents

1) *Rights under GDPR*

The European Union’s General Data Protection Regulation and the United Kingdom’s version of the same (collectively, the “GDPR”) afford certain rights to individuals in the European Economic Area (“EEA”). If you are in the EEA, you have the following rights. Note, however, that not all rights apply in all circumstances.

- Right of access: subject to certain exceptions, you have the right of access to your personal information that we hold. If you are requesting access to your data in order to protect the rights of others, we may require you to validate your identity before we can release that information to you
- Right to rectify your personal information: if you discover that the information, we hold about you is inaccurate or incomplete, you have the right to have this information rectified (i.e., corrected).
- Right to be forgotten: you may ask us to delete information we hold about you in certain circumstances. This right is not absolute, and it may not be possible for us to delete the information we hold about you, for example, if we have an ongoing contractual relationship or are required to retain information to comply with our legal obligations.
- Right to restriction of processing: in some cases, you may have the right to have the processing of your personal information restricted. For example, where you contest the accuracy of your personal information, its use may be restricted until the accuracy is verified.
- Right to object to processing: you may object to the processing of your personal information (including profiling) when it is based upon our legitimate interests. You may also object to the processing of your personal information for the purposes of direct marketing and for the purposes of statistical analysis.
- Right to data portability: you have the right to receive, move, copy, or transfer your personal information to another controller when we are processing your personal information based on consent or on a contract and the processing is carried out by automated means.

With regard to the personal information discussed in this Policy, we are typically the “data controller” for such information under the GDPR. As a result, if you wish to exercise one of the rights discussed above, you may do so by submitting a written request to customerservice@sellars.com with the subject line, “GDPR Request.” This is normally free, unless this process is unduly difficult or is clearly unfounded, repetitive, or excessive, in which case we may charge a reasonable fee or decline to respond. Once we have received your request, we will review it and contact you within thirty (30) days of receipt of your request, will notify you of any delay in processing your request and, in any event, will respond to the request within three (3) months. Please note that we may need to request specific information from you to help us confirm your identity. If you are located in the EEA or UK and have a concern about our processing of your data, you may have the right to make a complaint to the appropriate data protection authority in the EEA or UK.

2) Lawful Basis under GDPR

We will process different types of information under different lawful bases under the GDPR depending on the nature of the information and your relationship with us. The following table describes how we plan to use your personal information and our lawful basis for doing so. We may process your personal information on more than one basis depending on the specific purpose for which we have collected or are otherwise using your information.

Purpose/Activity	Type of Information	Basis of Processing
To enter into and subsequently to manage our business relationship with your company, including:	<ul style="list-style-type: none"> • Contact Information • Transactional Information • Communications Information • Account Information • Financial Information 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to manage our business relationships and administer our operations)

<ul style="list-style-type: none"> • Negotiating, entering into, and performing agreements with your company • Responding to inquiries and providing customer support and service • Managing and processing transactions for our services • Notifying you about changes to our website, business terms, or this Policy • Communicating with you and responding to your inquiries regarding our services, agreements with your company, and other issues 		<p>including through the keeping of appropriate records)</p> <ul style="list-style-type: none"> • Performance of a contract with you • Necessary to comply with legal obligations
<p>To administer and protect our business and website including:</p> <ul style="list-style-type: none"> • Maintaining business records for legal purposes and to comply with tax requirements • Defending and advancing legal claims • Enforcing our rights under any agreements • Ensuring effective security for our services and website • Conducting website maintenance • Identify and address security risks and unlawful activity 	<ul style="list-style-type: none"> • Contact Information • Transactional Information • Communications Information • Device and Usage Information • Financial Information • Account Information 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (running our business, facilitating administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise) • Necessary to comply with legal obligations
<p>To make decisions about how best to deliver relevant website content and advertisements to you, and otherwise market to you, and to better understand the effectiveness of our marketing efforts</p>	<ul style="list-style-type: none"> • Marketing Information • Transactional Information • Communications Information • Device and Usage Information 	<p>Necessary for our legitimate interests (better understanding website functionality and how website users navigate and interact with the site)</p>
<p>To advance and promote our business interests including contacting you regarding products, services, or promotions that may be of interest to your company, conducting surveys or soliciting feedback on our services,</p>	<ul style="list-style-type: none"> • Contact Information • Marketing Information • Transaction Information • Device and Usage Information 	<p>Necessary for our legitimate interests (to enhance our services, improve our marketing strategies and develop our business)</p>

and updating, developing, and improving our products/services, customer service, and marketing efforts		
To process applications for employment that are submitted to our company	<ul style="list-style-type: none"> • Job applicant information 	Necessary for our legitimate interests (to evaluate candidates for employment)

3) *Transfers from EEA, Switzerland, or UK*

If we transfer personal information from the EEA, Switzerland, or UK to the United States or any other country, we will implement appropriate legal mechanisms to ensure an adequate level of personal data protection consistent with the GDPR's requirements. For example, if the recipient country has not received an Adequacy Decision from the European Commission (such as the United States), we will rely on Standard Contractual Clauses (SCC) that have been approved by the European Commission as the lawful mechanisms for such transfers. Further, we will enter into appropriate data processing agreements with all non-EU (sub)processors that contain SCCs and define data protection standards to be employed by each (sub)processor.

How to Access and Update Your Information.

Sellars takes reasonable steps to keep your personal information accurate and complete. You can access or update your personal information, including contact or account information, in the following ways:

- If you have created an account on one of our websites, log into your account. Once you do, you will be able to enter and update your own contact information and payment information, as well as contact information for recipients you have designated.
- Contact us at the email or postal address listed in the "Contact Us" section at the bottom of this Policy. Please include your current contact information, the information you are interested in accessing, and your requested changes. We will provide you the personal information requested if reasonably available, unless it infringes on the privacy of other individuals and subject to reasonable limitations provided by law and internal procedures. Otherwise we will describe the types of information we typically collect. We will provide access and make changes you request, or will provide an explanation of what actions we will be able to take with regard to the request.
- If you need help accessing your information related to a service provided by a third party, we will assist you by referring you to the third party. Please contact us via the "Contact Us" section below.

Information Security.

We use appropriate administrative, technical, and physical measures to protect your personal information from loss, theft, and unauthorized use, disclosure, or modification. Please be aware that no data transmission over the Internet is 100% secure. While we strive to protect your personal information, we cannot ensure or warranty the security of any information you transmit to us and you do so at your own risk.

Privacy of Children Online

We are committed to protecting children's online privacy. Our websites are for a general audiences and are not geared towards children. In order to protect the privacy of children, Sellars does not knowingly collect personal information from children under the age of 16 without prior parental consent. Please contact us via the "Contact Us" section below.



Us" section of this Policy if you believe we may have collected information from your child and we will work to delete it.

Data Retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or other mandatory reporting requirements. To determine the appropriate retention period we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure, the purposes for which we process it, whether we can achieve those purposes through other means, and the applicable legal requirements. We also consider any specific limitation periods under applicable law.

International.

You understand and agree that information about you may be sent to and processed by computers located in the United States.

Changes to the Sellars Privacy Policy.

We may modify this privacy policy from time to time. Please check back on this page for notice of such changes.

Contact Us.

For general customer information contact: 1-800-237-8454 or customerservice@sellars.com

For information specific to this Privacy Policy, contact: 1-800-237-8454 or customerservice@sellars.com