

## YKK AP AMERICA INC.

### PRIVACY POLICY

**Effective Date:** November 1, 2024, rev. January 1, 2026

#### Introduction and Scope

YKK AP America Inc. (“**YKK AP**”, “**we**”, “**us**” or “**our**”) respects the privacy of our website visitors and customers (referred to as “**you**” or “**your**”). This privacy policy (as posted on our website [here](#) and as amended from time to time and effective as of the date posted) (“**Privacy Policy**”) describes the types of information we may or do collect from you or that you may provide when you visit or use our [ykkap.com](#) website (“**Website**”), purchase our products (“**Products**”), or use our services (“**Services**”), and our practices for collecting, using, maintaining, protecting, disclosing, retaining, and transferring that information. This Privacy Policy applies to the data collected by us, or those working on our behalf, through information you enter or from the data imported from sources authorized or approved by us. It does not apply to data collected through third-party websites, or to products, or services not approved by us. This Privacy Policy does not apply to persons residing in California who submit information to us regarding employment. Please see our separate Privacy Notice if you are submitting such information.

#### Acknowledgement and Consent

By visiting our Website, or purchasing or using our Products or Services in any manner, you acknowledge that you accept the terms, practices and policies described in this Privacy Policy (and as updated from time to time), and you hereby consent that we may collect, use, process, share, retain, and transfer your information as described herein. If you do not agree with our policies and practices, your choice is not to use our Website or our Services. Your use of our Website and our Services is at all times subject to our Terms of Use (available [here](#) and as amended from time to time and effective as of the date posted (the “**Terms**”)), which is incorporated by reference herein. Any capitalized terms we use in this Privacy Policy without defining them have the definitions given to them in the Terms.

#### Changes to Our Privacy Policy

We are constantly working to improve our Website and Services, and we may need to change this Privacy Policy from time to time as well. Our current Privacy Policy will always be on our Website and any updates will be effective upon posting. You are responsible for periodically checking our Website for updates. Under certain circumstances, we also may elect to notify registered Users of changes or updates to this Privacy Policy by additional means, such as posting a notice on the Website or by sending you an email, but you should not rely on receiving such additional notice.

If you use the Website, purchase Products, or use our Services after any changes to the Privacy Policy have been posted, you agree to the new Privacy Policy. Our practices regarding information we collect now is subject to the Privacy Policy in effect at the time such information is collected.

#### What Information Does This Privacy Policy Cover?

This Privacy Policy covers our treatment of your personally identifiable information. “**Personal Information**” generally refers to any unencrypted or non-deidentified information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked with a particular person. However, the definition of Personal Information may vary depending on the state or country in which you reside, and that state’s or country’s definition will apply to your

Personal Information in the context of this Privacy Policy. Please see additional information below on the particular information we may collect.

Personal Information does not include information publicly available from government records or information excluded by applicable law. Personal Information also does not include your Personal Information that has been deidentified, pseudonymized, anonymized, aggregated, and/or otherwise processed so as to be unidentifiable in such a way that the data can no longer be attributed to a specific individual (by reasonable means) without the use of additional information, and where such additional information is kept separate and under adequate security to prevent unauthorized re-identification of a specific individual such that one could not, using reasonable efforts, link such information back to a specific individual (collectively, all of the foregoing in this sentence being referred to as "**De-Identified Personal Information**").

We also may collect Personal Information from you through means other than our Website. This may include offline collection, such as if you submit a paper application, make a payment by check, or call or visit our office. It also may include emails or other electronic communications that you send to us separate from our Website or by way of our Service Providers (as defined herein). However, if we combine the Personal Information we collect from you outside of our Website with Personal Information that is collected through our Website or by another means as described above, the Privacy Policy will apply to the combined information, unless specifically disclosed otherwise. For example, if you are applying for employment through our careers portal, either via our Website or offline, we or our Service Providers may obtain information from you and/or third parties about membership, licensing, accreditation, certification, professional, and/or employment as part of a background check, among other information, as part of the application process.

Other than as stated herein, this Privacy Policy does not apply to information collected by any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on our Website. We are not responsible for the practices of sites linked to or from our Website, and before interacting with any of these sites you are advised to review their rules and policies before providing them with any private information.

### **Individuals under the Age of 18**

We do not knowingly collect, solicit or maintain Personal Information from anyone under the age of 18 or knowingly allow such persons to register for or use our Services. If you are under 18, please do not send any Personal Information about yourself (such as your name, address, telephone number, or email address) to us. In the event that we learn that we have collected Personal Information from a child under age 18 without verification of parental consent, we will use commercially reasonable efforts to delete that information from our database. Please contact us if you have any concerns.

### **Personal Information We Collect**

We may collect several categories of Personal Information from and about you as summarized in the following table:

Category	Specific Items of Personal Information
Identifiers	<ul style="list-style-type: none"> <li>• first and last name</li> </ul>

Category	Specific Items of Personal Information
	<ul style="list-style-type: none"> <li>user name (which may include first and last name)</li> <li>email address</li> <li>postal address</li> <li>zip code</li> <li>unique personal identifier, e.g.: <ul style="list-style-type: none"> <li>phone number</li> <li>mobile device identifier</li> <li>account name or number</li> </ul> </li> </ul>
Internet or other electronic network activity; device information	<ul style="list-style-type: none"> <li>type and manufacturer of device and its ID/UDID or similar device-specific code</li> <li>Internet Protocol (IP) address, protocol, and/or sequence information</li> <li>operating system and platform</li> <li>Internet service provider or mobile carrier's name, connection speed, and connection type</li> <li>browsing, session, interaction, and search history related to our Website</li> <li>cookies</li> <li>pixel tags</li> <li>browser type, language, and version</li> <li>screen resolution</li> <li>material and pages viewed</li> </ul>

## How We Collect Personal Information and from What Sources

**Information You Provide Us.** The Personal Information we collect through our Website, or from our distributors, resellers, representatives, business partners, Service Providers, parent, affiliates, divisions, and subsidiaries may include the following:

- Information that you provide by filling in webforms on our Website. This includes information provided when creating an online account, purchasing or using our Products or Services, subscribing to our e-newsletters or other communications, requesting information from us, submitting or posting material (where permitted) on our forums, or interacting with customer support or service, report a problem with our Website, Products, or Services, or otherwise communicating with us.
- Records and copies of your correspondence (including email addresses), if you contact us
- Your responses to surveys that we or our Service Providers might ask you to complete for research purposes
- Your search queries on the Website
- When communicating with customer service/support
- Other Service Providers

**Information We Collect Through Automatic Data Collection Technologies.** As you navigate through and interact with our Website, we may use automatic data collection technologies

to collect certain information about your equipment, browsing actions and patterns, including the following:

- Details of your visits to our Website, including, but not limited to, website traffic data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer, mobile device, and internet connection, including your IP address, operating system, browser type, clickstream patterns, the URL of the most recent website you visited before coming to our Website, the amount of time you spent on our Website, and the pages you viewed while on our Website.

**Behavioral Tracking.** We do not allow personalized third-party behavioral tracking, though we may use De-Identified Personal Information to track users' click or browsing patterns.

**Cookie Notice and Policy.** The technologies we use for automatic data collection may include cookies, local storage cookies, web beacons, pixel tracking, GIF, IP address, and other technologies. Please see our [Cookie Policy](#) website page.

**Meta Pixel.** We may incorporate "pixels" provided by Meta Platforms, Inc. on our Website. This enables us to track user behavior after a user clicks on a Facebook ad and is redirected to our website. By doing so, we can assess the effectiveness of Facebook ads for statistical and market research purposes and sometimes retarget certain users. Please note that the data collected through this process remains anonymous to us, meaning we do not have access to personal information of individual users. However, Facebook stores and processes this data. Therefore, we are providing you with this information based on our current understanding. It is important to be aware that Facebook may associate this information with your Facebook account and utilize it for its own promotional activities, in accordance with Facebook's Data Usage Policy, available [here](#). You have the option to authorize Facebook and its partners to display advertisements on and off Facebook (see [here](#)). Additionally, a cookie may be stored on your computer for these purposes.

### Information We Collect from Third Parties

We may collect information that others provide about you when you use the Website, or obtain information from other sources and combine that with information we collect through the Website. To the extent permitted by applicable law, we may receive additional information about you, such as demographic data or fraud detection information, from third-party Service Providers and/or partners, and combine it with information we have about you. For example, we may receive background check results or fraud warnings from Service Providers like identity verification services for our fraud prevention and risk assessment efforts. We may receive information about you and your activities on and off the Website through partnerships, or about your experiences and interactions from our partner ad networks. Other examples of such providers include, but are not limited to, video hosting platform, email management, authentication, form processing, website usage tracking, and database hosting and management.

### Third-Party Use of Cookies and Other Tracking Technologies

Some content or applications, including advertisements, on the Website is served by third parties, including advertisers, ad networks and servers, content providers and application providers. First-party or third-party cookies may be used alone or in conjunction with web beacons or other

tracking technologies to collect or compile information regarding user interactions with ad impressions and other ad service functions as they relate to our Website. A first-party cookie is a cookie set by the domain name that appears in the browser address bar. A third-party cookie is a cookie set by (and on) a domain name that is not the domain name that appears in the browser address bar. It might be set as part of a side resource load (image, JS, iframe, etc., from a different hostname) or an AJAX HTTP request to a third-party server. The information that first-party and third-party cookies 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 (i.e., tracking such activities). 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. We, along with third-party vendors such as Google, use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to compile data regarding user interactions with ad impressions and other ad service functions as they relate to our Website. More information on how to opt-out of third-party advertiser tracking mechanisms is available [here](#).

**Google Tools.** We use tools provided by Google as described below.

*Google Analytics.* We use, and/or some of our third-party Service Providers may use, Google Analytics or other analytics service to help us understand the use of our Website and Services. Google Analytics is a web analysis service provided by Google. Google utilizes data it collects to track and examine the use of our Website to prepare reports on its activities and share them with other Google services. Google may use the data collected to contextualize and personalize the ads of its own advertising network. The Personal Information collected and processed may include cookies, usage data, and other internet information. This processing may constitute a "sale" of Personal Information based on the definition under CPRA. Residents of California can find information regarding how to opt out of the sale in the section below describing the rights of California residents. Such service providers may place their own cookies in your browser. This Privacy Policy covers use of cookies by us only and not the use of cookies by third parties.

*Google Tag Manager.* We use Google Tag Manager to gain insights from activities such as conversion events, file downloads, and page scroll depth. To learn more about Google Tag Manager, please visit [here](#).

Users can set preferences for how Google advertises to you using the Google Ad Settings page. Alternatively, you can opt out by visiting the Network Advertising Initiative Opt Out page or by using the Google Analytics Opt Out Browser add-on.

## How We Use Your Information

We use information that we collect about you or that you provide to us, including any Personal Information, for one or more of the following purposes:

- To present to you our Website and contents and provide information and notices (e.g., updates) related thereto.
- To provide you with Products, Services, and information related thereto that you request from us and your related questions.

- To provide customer Service and support.
- To send you emails and newsletters with Product, Service, company, and other information and offers.
- To allow you to participate in interactive features on our Website.
- To enhance and improve our Products and Services, for example, by performing internal research, analyzing user trends and measuring demographics and interests and for analyzing how the Products and Services are used, diagnosing Service or technical problems, and maintaining security.
- To de-identify, aggregate, anonymize, etc., your Personal Information or other data.
- For internal purposes, such as Website, Service, Product, and system administration or internal audits and reviews, and use of identity-verification technologies.
- To our affiliates, subsidiaries, divisions, and/or our members of our family of companies.
- To comply with applicable law(s) (e.g., to comply with a search warrant, subpoena or court order) or to carry out professional ethics/conduct investigations.
- In any other way we may describe and for which we obtain your consent when you provide the information.

We will not collect additional categories of Personal Information or use the Personal Information we collect for materially different, unrelated, or incompatible purposes without providing you notice thereof.

We use cookies, clear gifs, and log file information to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the Website; (b) provide custom, personalized content and information; (c) monitor the effectiveness of our Services; (d) monitor aggregate metrics such as total number of visitors, traffic, and demographic patterns; (e) diagnose or fix technology problems reported by our users or engineers that are associated with certain IP addresses; and/or, (f) help you efficiently access your information after you sign in.

### Social Media Plugins

We integrate social media application program interfaces or plug-ins (“**Plug-ins**”) from social networks, such as Facebook, Google+, LinkedIn, Xing, Twitter, Instagram, Tumblr, Pinterest and/or possibly other companies, into the Website.

For example, when you visit our Website, the plugin creates a direct connection between your browser and the Facebook server. This allows Facebook to receive information about your visit to our Website with your IP address. If you click the Facebook “Like” button while you are logged on to your Facebook account, you can link the contents of our Website to your Facebook profile. This allows Facebook to assign your visit to our Website to your user account. Please note that as provider of the Website, we receive no notification about the contents of the transmitted data or their use by Facebook. If you do not want Facebook to assign your visit to our Website to your Facebook user account, please log out of your Facebook user account.

If you do so, you authorize us to access certain social media site account information, such as your public social media profile (consistent with your privacy settings in the social media site), your email address, interests, likes, gender, birthday, education history, relationships, interests, current city, photos, personal description, friend list, and information about and photos of your social media site friends who might be common social media site friends with other users. Plug-ins may transfer information about you to the Plug-in’s respective platform without action by you. This

information may include your platform user identification number, which website you are on, and more. Interacting with a Plug-in will transmit information directly to that Plug-in's social network and that information may be visible by others on that platform. Plug-ins are controlled by the respective social media site's privacy policy (available on their website), and not by our Privacy Policy.

### Disclosure of Your Personal Information

We may or do disclose your Personal Information, in whole or in part, to the following types of third parties, and for one or more of the following purposes:

Type of Third Party	Purpose
Data storage or hosting providers	Secure storage and transmission of your data
Database and software service providers	Management and tracking of your data
Legal and compliance consultants, such as external counsel, external auditors, or tax consultants	Provide professional services to us
Identity management providers	Authentication purposes
Technology providers	Assist in the development and management of our Website

**Disclosures to Service Providers.** We may disclose your Personal Information to third parties for the purpose of providing or improving the Services to you. We may disclose your Personal Information to third-party service providers which perform services on our behalf ("Service Providers"). This includes, without limitation, Service Providers which provide services relating to: outbound and/or inbound communications, data analysis, marketing assistance, managing customer information, creating, hosting, and/or providing customer or support services on our behalf, sending postal mail and email, removing repetitive information from customer lists, and providing search results and links. These Service Providers may have access to your Personal Information in order to provide these services to us or on our behalf. If we engage Service Providers for any of the foregoing, use of your Personal Information will be bound by obligations of confidentiality and their use of Personal Information will be restricted to providing their services to us. We may store Personal Information in locations outside our direct control (for instance, on servers or databases located or co-located with hosting Service Providers).

**Required Disclosures.** Except as otherwise described in this Privacy Policy, we will not disclose your Personal Information to any third party unless required to do so by law, court order, legal process (e.g., subpoena), including, but not limited to, in order to respond to any government, regulatory, or licensing request, or if we believe that such action is necessary to: (a) comply with the law, comply with legal process served on us or our affiliates, subsidiaries, service providers, or partners, or investigate, prevent; (b) enforce our Terms or customer agreement (including for billing and collection purposes); (c) take precautions against liability; (d) investigate and defend ourselves against any third-party claims or allegations or to investigate, prevent, or take action regarding suspected or actual illegal activities; (e) assist government enforcement agencies or to meet national or other security requirements; (f) to protect the security or integrity of our Website or Services or, (g) exercise or protect the rights, property, or personal safety of us, our users or others. We will attempt to notify you, where reasonably practicable, about these requests unless: (i) providing notice is prohibited by the legal process itself, by court order we receive, or by applicable law or regulation, or (ii) we believe that providing notice would be futile, ineffective, create a risk of harm to an individual or group, or create or increase a risk of acts of fraud done upon us or our users. In instances where we comply with legal requests without notice for these

reasons, we will attempt to notify that user about the request after the fact if we determine in good faith that we are no longer legally prohibited from doing so and that no risk scenarios described in this paragraph apply.

**No Sale or Sharing of Your Personal Information for Consideration.** We do not sell or share your Personal Information with any third parties for which we receive any monetary or other valuable consideration.

**Disclosure of De-Identified Personal Information.** We may share De-Identified Personal Information with third parties for any purpose except as prohibited by applicable law, including, but not limited to, the following. De-Identified Personal Information or non-Personal Information may be aggregated for system administration and to monitor usage of the Website. It may be utilized to measure the number of visits to our Website, average time spent, number of pages viewed and to monitor various other Website statistics. This monitoring helps us evaluate how visitors use and navigate our Website so we can improve the content. We may share De-Identified Personal Information or anonymous information (including, but not limited to, anonymous usage data, referring/exit pages and URLs, IP address, platform types, number of clicks, etc.) with interested third parties in any way we choose and for any purpose. We may disclose, sell, rent, etc.

**Your Consent to Disclosure/Transfer/Assignment of Your Personal Information.** You consent to (and shall not object) our disclosure, transfer, assignment, and/or sale of your Personal Information, De-Identified Personal Information, and other information you provide to us, as well as the rights you have granted or consented to in this Privacy Policy (collectively, “**Transferred Information**”) to a potential or actual buyer or acquirer of assets or equity of our company or other successor for the purpose of considering or undergoing a merger, divestiture, restructuring, reorganization, dissolution, change in control, or sale or transfer of some or all of our assets (each of the foregoing referred to as a “**Transfer**”), whether as a going concern or as part of bankruptcy, liquidation or other court proceeding, in which Personal Information held by us is among the assets transferred. We cannot make any representations regarding the use or transfer of Transferred Information that we may have in the event of our bankruptcy, reorganization, insolvency, receivership, or an assignment for the benefit of creditors. Furthermore, except as required by law, we are not and will not be responsible for any breach of security by any third parties or for any actions of any third parties that receive any of the Transferred Information that is disclosed to us.

## Security

We have implemented technical, administrative, and organizational security measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, destruction, alteration and disclosure. Your Personal Information is stored behind secured networks and a firewall and is only accessible by our personnel and by a limited number of Service Providers who have special access rights to our systems, and who are required to keep the information confidential. Our Website is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our Website safe.

Our agents, contractors, Service Providers, and partners who require access to your Personal Information in order to provide services to us or to you on our behalf are also required to keep the information confidential in a manner consistent with this Privacy Policy and are not permitted to disclose the information to third parties or use the information for any purpose other than to carry out the services they are performing for us, or as permitted pursuant to our agreement with them.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do use security measures designed to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to us or which we obtain. Any transmission of Personal Information is at your own risk. Unauthorized entry or use, or hardware or software failure, and other factors, may compromise the security of user information at any time. We are not responsible for circumvention of any privacy settings or security measures contained on the Website or used with our Services.

The safety and security of your information also depends on you. You should maintain good internet security practices. Where you have password-protected access to an account or certain parts of the Website or Services, you are responsible for keeping this password confidential. Please help keep your account safe by using a strong password, or, better yet, a strong pass phrase. You should not share your password with anyone. You must prevent unauthorized access to your account and Personal Information by selecting and protecting your password appropriately and limiting access to your computer or mobile device and browser by signing off after you have finished accessing your account. If your email account is compromised this could allow access to your account with us if you have given up those details and/or permitted access through those accounts. If your email account is compromised it could be used to ask us to reset a password and gain access to your account with us. If you think that your account has been compromised you should change your account credentials with us, and in particular make sure any compromised account does not allow access to your account with us. The information you share in public areas may be viewed by other users. We will never email you to ask for your password or other account login information. If you receive such an email, please send it to us so we can investigate.

You hereby release and forever discharge us and our affiliates, subsidiaries, officers, directors, employees, and agents, and their respective successors and assigns, and you will indemnify, defend and hold us harmless, from and against any liability, claim, or cost (including attorneys' fees), arising directly or indirectly from any failure by you to maintain the security of your email or other accounts that directly or indirectly results in an unauthorized third party having access to such email or accounts or causes us to transfer funds based on instructions purporting to have originated from you (i.e., "wire transfer fraud" or "business email compromise" events).

## **Data Retention**

In general, our retention of Personal Information is reasonably necessary and proportionate to achieve the purposes for which the Personal Information was collected or processed, or for another disclosed purpose that is compatible with the context in which the Personal Information was collected, and not further processed in a manner that is incompatible with those purposes. This period of retention is subject to our review and alteration. We will also retain Usage Data for analytics purposes. "**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). Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

We may retain De-Identified Personal Information for as long as we deem appropriate.

## What Information You Can Access, Change, or Delete

Through your user account settings page, you may access and, in some cases, edit, or delete certain information you have provided to us, such as name and password, email address, address, user profile information, etc. The information that you can view, update, and delete may change as the Website or Services or our practices change. If you have any questions about viewing or updating information we have on file about you, please contact us.

## Privacy Notice for Residents of California and Certain Other States

This section applies to California residents, but certain aspects may also apply to residents of certain other states, depending on your state's laws.

*California Online Privacy Protection Act (“CalOPPA”; also known as the “Shine the Light” law)  
Calif. Bus. & Prof. Code § 22575-22578, available [here](#)):*

CalOPPA applies only to companies which collect Personal Information of California residents.

**How We Respond to Do Not Track Signals.** CalOPPA requires us to let you know how we respond to web browser Do Not Track (“DNT”) signals. DNT is a privacy preference you can set in your web browser to indicate that you do not want certain information about your webpage visits collected across websites when you have not interacted with that service on the page. For details, including how to turn on DNT, see [here](#). Because there currently isn’t an industry or legal standard recognizing or honoring DNT signals, we don’t respond to them at this time. We await the result of work by the privacy community and industry to determine when such a response is appropriate and what form it should take.

You can visit our Website anonymously by adjusting the settings in your browser.

**Third-Party Behavioral Tracking.** We do not allow third-party behavioral tracking of Personal Information, though we may use De-Identified Personal Information to track users’ click and/or browsing patterns.

*California Consumer Privacy Act of 2018 (“CCPA”) as amended by the California Privacy Rights Act of 2020 (together, “CPRA”, available [here](#)):* If you are a California resident (occasionally referred to below as “Consumer”), California law provides Consumers with additional rights regarding our use of your Personal Information. For purposes of this section the term Personal Information means “Personal Information” as defined under CPRA or under the privacy law of the state in which you reside.

California and certain other states provide (as of the effective date of this Privacy Policy) consumers with additional rights, which, for certain states, are summarized in the table below:

### Privacy Notice of Rights in Certain States (updated 8/2024)

Right	Description of Right	California	Colorado	Connecticut	Texas	Utah	Virginia
Access	Right to access a copy of your Personal Information held by us right to know what Personal Information has been	Yes, other than trade secrets	Yes, other than trade secrets	Yes, other than trade secrets	Yes	Yes	Yes

Right	Description of Right	California	Colorado	Connecticut	Texas	Utah	Virginia
	collected, from where, and why,						
Correction	Right to have inaccuracies in your Personal Information corrected	Yes	Yes	Yes	Yes	No	Yes
Deletion	Right to request deletion of your Personal Information held by us	Yes, of consumer-provided data only	Yes	Yes	Yes	Yes, of consumer-provided data only	Yes
Opt out of sale or sharing	Right to request information about the categories of Personal Information we sell or share (if any) and data we share with third parties (the foregoing of which is described above in this Privacy Policy)	Yes	Yes	Yes	Yes	Yes	Yes
Opt out of targeted advertising	Right to opt-out of the use of automated decision-making technology, including profiling	Yes	Yes	Yes	Yes	Yes	Yes
Opt out of profiling	Right to opt-out of our use of profiles	Yes	yes	Yes	Yes	No	Yes
Limit use and disclosure of sensitive Personal Information	Right to limit our use of sensitive Personal Information we collect (if any) to what is necessary to perform the services or provide the goods reasonably expected by an average consumer	Yes	Yes	Yes	Yes	Yes	No
Data portability	Right to transmit your Personal Information to another business	Yes	Yes	Yes	Yes	Yes, for consumer-provided data only	Yes, for consumer-provided data only
Nondiscrimination	We will not discriminate against you simply for your exercising any of your rights	Yes	Yes	Yes	Yes	Yes	Yes

Right	Description of Right	California	Colorado	Connecticut	Texas	Utah	Virginia
Appeal	Right to appeal our decision (if we decline to honor your request; likely due to an exception in the law)	No	Yes	Yes	Yes	No	Yes

The categories of your Personal Information we collect are listed above in the section entitled “Personal Information We Collect.” The purposes for which the categories of Personal Information are or may be used is described above in the section entitled “How We Use Your Information” and in other sections of this Privacy Policy.

#### Sharing/Sale of Personal Information

**WE DO NOT SELL OR SHARE (AS THOSE TERMS ARE DEFINED IN CPRA) YOUR PERSONAL INFORMATION, PERIOD.** We have not sold any Personal Information of any California residents within the past twelve (12) months.

We have not sold or shared (as those terms are defined under CPRA) your Personal Information for monetary or other valuable consideration; however, our use of cookies and other website tracking technologies may be considered a sale or sharing of Personal Information under the CPRA, in which case the categories of Personal Information that we have sold or shared under the CPRA include identifiers (e.g., IP addresses) and internet or other similar network activity. Categories of third parties to whom Personal Information is sold or shared under the CPRA include data analytics providers and advertising and marketing providers.

#### Exercising Access, Data Portability, and Deletion Rights

You can submit a request to opt-out of the selling and/or sharing of your personal information by emailing us at [compliance@ykkap.com](mailto:compliance@ykkap.com)

An authorized agent may submit a request to opt-out on your behalf if you provide us with signed written authorization for the agent to act on your behalf. The Company may deny a request from an authorized agent if the agent does not provide your signed permission demonstrating that they have been authorized by you to act on your behalf.

The Company may deny a request to opt-out if it has a good-faith, reasonable, and documented belief that the request is fraudulent. In this case, the Company shall inform the requestor that it will not comply with the request and shall provide the requestor an explanation as to why the Company believes the request is fraudulent.

You also may make a verifiable Consumer request on behalf of your minor child. You may only make a verifiable Consumer request for access or data portability twice within a 12-month period. The verifiable Consumer request 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 Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. Making a verifiable Consumer request does not require you to create an account with us. We will only use Personal Information provided in a verifiable Consumer request to verify the requestor's identity or authority to make the request.

### **Verification Process**

When you submit a request, we will match the information you submitted with the information we have for you on file. Upon verification of your identity, we will proceed to process your request (subject to the exceptions stated above). We may not be able to comply with your request if (a) we are unable to verify your request, (b) if we are unable to match you with information in our database, or (c) if an exception under the law exists exempting us from complying with your request.

### **Response Timing and Format**

Unless applicable state law requires otherwise, we will confirm receipt of your request within the applicable statutory time limit, if any, of receiving it. We will respond to a verifiable Consumer request within the applicable statutory time limit, if any. If we require more time (up to an additional period as permitted by applicable statute), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable Consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable Consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Please note that this right does not apply if the disclosure of Personal Information is for purposes consistent with the California resident's reasonable expectations, when considering the submission's circumstances.

### **Disclosure of Personal Information for a Business Purpose**

In the preceding twelve months, Company has or may have disclosed the following categories of Personal Information for a "business purpose" (as that term is defined in the CPRA): name, email address, mailing address, and telephone number.

### **Data Deletion Right**

You 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, we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies (as described below).

As permitted by CPRA we may delete your Personal Information by (a) permanently and completely erasing the Personal Information on our existing systems with the exception of archived or back-up systems; (b) de-identifying the Personal Information; or, (c) aggregating the Personal Information.

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.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal, regulatory or law enforcement obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### Appeal

Where permitted under applicable law (e.g., Colorado, Connecticut, and Virginia), you may appeal our denial of your request if you feel we have made a mistake. To submit an appeal, please use the same method of contact that you used to submit your request.

### Non-Discrimination

We will not discriminate against you simply for your exercising any of your CPRA or other state data access rights. Unless permitted by applicable law or regulation, we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including by refusing to grant discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; or,
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

## Where We Process and Store Personal Information

We have our headquarters in the United States. The Personal Information we or our Service Providers collect may be stored and processed in servers within or outside of the United States and wherever we and our Service Providers have facilities around the globe, and certain information may be accessible by persons or companies outside of the United States who provide services for us. You consent to our and our Service Providers' transmission, processing, and/or transfer of your Personal Information to, or access it in, jurisdictions that may not provide equivalent levels of data protection as your home jurisdiction. We will take reasonable steps to ensure that your Personal Information receives an adequate level of protection in the jurisdictions in which we process it.

If you are a citizen or resident of the UK, European Economic Area ("EEA"), Switzerland, or other countries or regions with laws governing data collection and use that may differ from the laws in the United States, please note that we may transfer your information to a country or jurisdiction that does not have the same data protection laws as your jurisdiction. We may do so to process your information by staff, contractors, or Service Providers operating outside the countries who work for us.

If you are a resident of a country other than the United States, you acknowledge and consent to our (and our Service Providers) collecting, transmitting, processing, transferring, and storing your Personal Information out of the country in which you reside.

## Notices; Opting Out

By providing us with your phone number and/or email address, you consent to our using the email address and/or phone number to send you Service-related notices by email, including any notices required by law (e.g., notice of data privacy or security incidents), in lieu of communication by postal mail. You also agree that we may send you notifications by email of activity regarding our Products, Services, the Website, your Personal Information, or any aspect of our relationship, to the email address you give us, in accordance with any applicable privacy settings. We may use your email address to send you other messages or content, such as, but not limited to, newsletters, additions or changes to features of the Service, or special offers. If you do not want to receive such email messages, you may opt out by emailing us your opt-out request or, where available, by clicking "unsubscribe" at the bottom of our e-newsletter. Opting out may prevent you from receiving email messages regarding updates, improvements, special features, announcements, or offers. You may not opt out of Service-related emails.

You can add, update, or delete information as explained above. When you update information, however, we may maintain a copy of the unrevised information in our records. You may request deletion of your account by emailing us. It is your responsibility to maintain your current email address with us.

## Contact Information

If you have any questions about this Privacy Policy or our privacy practices, please contact us by email at [compliance@ykkap.com](mailto:compliance@ykkap.com).