

ASTA AMERICA

Privacy Policy

Effective Date: November 1, 2019

Last Reviewed: November 1, 2020

Introduction

Asta Industries, Inc. d/b/a Asta America and Atlanta Door Corporation (“**Asta**” or “**Company**” or “**We**”) respects your privacy and are committed to protecting it through our compliance with this Policy.

This Privacy Policy (the “**Policy**”) describes the types of information we may collect from you or that you may provide when you visit the website www.astaamerica.com (our “**Website**”) and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Policy applies to information we collect:

- On this Website, including but not limited to, when you submit information in the course of requesting a contact or a quote.
- In email and other electronic messages between you and this Website.
- Through mobile and desktop applications you download from this Website, which provide dedicated non-browser-based interaction between you and this Website.
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this Policy.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by Company or any third party (including our affiliates and subsidiaries).
- Any third party (including our affiliates and subsidiaries), including through any application or content, including advertising, that may link to or be accessible from the Website.

Please read this Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this Privacy Policy. This Policy may change from time to time (see **Changes to Our Privacy Policy**). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

Children Under the Age of 16

Our Website is not intended for children under 16 years of age. No one under age 16 may provide any personal information to or on the Website. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on this Website or through any of its features, use any of the interactive or public comment features of this Website, or provide any information about yourself to us, including your name, address, telephone number, email address, or any user name you may use. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at legal@janusintl.com.

Information We Collect About You and How We Collect It

Like many sites, we and our third-party service providers, such as advertising and analytics providers, use cookies, web beacons and other data technologies to receive and store certain types of information when you interact with us through your computer or mobile device. Using these technologies helps us recognize you, customize your experience and make relevant marketing messages. For this Privacy Policy the definition of “**Personal Data**” is the definition under the law applicable to the person whose data is collected. If the Personal Data is that of a European citizen or resident, the definition of personal data is defined under GDPR, so, please see the section toward the end of this Privacy Policy. If the Personal Data is that of a California resident, the definition is as provided under California law. Personal Data does not include your personally identifiable 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 (the foregoing in this sentence being referred to as “**De-Identified Personal Data**”).

We collect several types of information from and about users of our Website, including information:

- By which you may be personally identified, such as name, postal address, e-mail address, telephone number, or any other identifier by which you may be contacted online or offline (“**personal information**”).
- That is about you but individually does not identify you, such as information from our third party service providers relating to marketing ads, often placed on third party sites, and how those ads performed or who clicked on them (this information does not identify any specific individual and is generally non-identifying. If we were to associate it with you we would treat it as personal information).
- About your internet connection, the equipment you use to access our Website, usage details, and Log and Device Data (the automatic recording of information when you visit our Website, including information that your browser sends whenever you visit our site). This log data may include your web address you came from or are going to, your device model, operating system, browser type, unique device identifier, IP address, mobile network carrier, and time zone or location.

We collect this information:

- Directly from you when you provide it to us.

- Automatically as you navigate through the Website. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.
- From third parties (e.g. our business partners or affiliates).

Information You Provide to Us

The information we collect on or through our Website may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of posting material, or requesting further services. We may also ask you for information when you report a problem with our Website.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Your search queries on the Website.

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:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically does not include personal information, but we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser or by clicking “Decline Cookie Settings” when prompted upon accessing the Website. However, if you decline or select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting or declined cookies when prompted, our system will issue cookies when you direct your browser to our Website.

- **Flash Cookies.** Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see **Choices About How We Use and Disclose Your Information**.
- **Web Beacons.** Pages of our the Website may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

We do not collect personal information automatically, but we may tie this information to personal information about you that we collect from other sources or you provide to us.

Third-Party Use of Cookies

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 our website.

We do not control these third parties' use of cookies 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**.

How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it, such as customer support.
- To provide you with notices about your account with us.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or any products or services we offer or provide though it. To analyze our products and services, as well as the Website, and to perform audits, security and fraud monitoring and prevention. We also use personal information to develop new services, enhance, improve or modify our existing service, identify usage trends, determine the effectiveness of our marketing efforts, and to operate our business.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may use your information to contact you about goods and services that may be of interest to you. If you do not want us to use your information in this way, you will be given an opportunity to opt out from having your information used in this way. For more information, see **Choices About How We Use and Disclose Your Information**.

We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this Privacy Policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Asta's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Asta about our Website users is among the assets transferred.
- To third parties to market their products or services to you if you have not opted out of these disclosures. We contractually require these third parties to keep personal information confidential and use it only for the purposes for which we disclose it to them. Any tracking that a third party performs is subject to their own Privacy Policy or Notice. Please note at this time, we do not recognize automated browser signals regarding tracking mechanisms, which may include "do not track" instructions. For more information, see **Choices About How We Use and Disclose Your Information**.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.
- Disclosures related to analytics (Specifically, for analytics providers, we use Google Analytics which is a web analytics service offered by Google that tracks and reports website traffic). Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. You can opt-out of having made your activity on the Site available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics

about visits activity. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <http://www.google.com/intl/en/policies/privacy/> Google also recommends installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout>, for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our terms of use (<https://www.astaamerica.com/termsfuse>) or terms and conditions of sale (<https://www.astaamerica.com/resource/terms-and-conditions>) and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Asta, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Choices About How We Use and Disclose Your Information

This site is operated in the United States. If you are located in another jurisdiction, please know that your information will be transferred to, stored, and processed in the United States. By using this site and providing us with information, you consent to this transfer, processing and storage of your information in the United States. It is important to note that the privacy laws in the United States may not be as comprehensive as those in other countries such as the European Union or Canada. Our service providers use appropriate safeguards to transfer your Personal Data to the United States.

We may transfer information that we collect from you to locations outside of headquarters for processing and storing. In addition, it may be processed by staff operating outside the office area who work for us or for one of our suppliers. For example, such staff may be engaged in the processing and concluding of your order, the processing of your payment details and the provision of support services. By submitting your personal information, you agree to this transfer, storing or processing. We will take all reasonable steps to make sure that your information is treated securely and in agreement with this Privacy Policy.

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
- **Promotional Offers from the Company.** If you do not wish to have your email address/contact information used by the Company to promote our own, our affiliates, or third parties' products or services, you can opt-out by sending us an email stating your request to legal@janusintl.com. If we

have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions. This opt out does not apply to information provided to the Company as a result of a product purchase, warranty registration, product service experience or other transactions.

We may have links on our Website to other sites that we do not operate. If you click on a third-party link, you will be taken directly to that site which is governed by its own privacy notice. We strongly encourage you to read that privacy notice. We do not control that site and assume no responsibility for the content, policies or its practices.

Accessing and Correcting Your Information

You may send us an email at legal@janusintl.com to request access to, correct or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your account with us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Any payment transactions will be encrypted to ensure its safety.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

Your California Privacy Rights

Online Privacy Protection Act (“CalOPPA”)

Under California Civil Code Sections 1798.83-1798.84 (known as the “Shine the Light” law), California residents are entitled to ask us annually for a notice identifying the categories of personal information which we share with our affiliates and/or third parties for marketing purposes, and providing contact information for such affiliates and/or third parties with whom the business has shared such information during the immediately preceding calendar year. To make such a request, please contact us with “Request for California Privacy Information” in the subject line and in the body of your message. We will comply with your request within thirty (30) days or as otherwise required by the statute. Please be aware that not all information sharing is covered by the “Shine the Light” requirements and only information on covered sharing will be included in our response. To obtain information under CalOPPA from us, please contact us, or, see more at the CalOPPA website.

California Consumer Privacy Act of 2018 (“CCPA”)



ASTAAMERICA

BY JANUS INTERNATIONAL

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights, click here: <https://www.janusintl.com/privacypolicy/californiarights>.

Changes to Our Privacy Policy

Asta may make minor changes to this Privacy Policy. It is our policy to post any changes we make to our Privacy Policy by publishing the updated Policy on our Website. If we make significant changes to how we treat our users' personal information, we will notify you by email to the email address specified in your account. The date the Privacy Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this Privacy Policy to check for any changes.

Contact Information

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

Asta America By Janus International

638 Cassville White Road NW

Cartersville, Georgia 30121

Phone: 770-974-2600

Email Contacts: legal@janusintl.com

The Following Provisions Apply Only to Citizens and Residents of the EEA and Switzerland

European residents may have additional personal information rights and choices. Please see **Your European Privacy Rights** for more information.

Your European Privacy Rights

The following provisions apply to you only if you are a European or Swiss citizen or resident. If you are a European citizen or resident of the European Economic Area ("EEA"), Switzerland, or other 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 Personal Data to a country or jurisdiction that does not have the same data protection laws as your jurisdiction. We may do so to process your Personal Data by staff operating outside the EEA who works for us or for one of our service providers. Under the European Union's General Data Protection Regulation¹ (GDPR) and other countries' privacy laws, you may have certain rights with respect to the processing of your Personal Data. These rights include:

- **Choosing not to provide your Personal Data**
- **Accessing, or obtaining a copy of, your Personal Data**
- **Checking and editing your data in your user account**
- **Unsubscribing from direct marketing**

¹ The **General Data Protection Regulation** (EU) 2016/679 ("GDPR") is a regulation in EU law on data protection and privacy for all individuals within the European Union (EU) and the European Economic Area (EEA). It also addresses the export of personal data outside the EU and EEA areas. For more information regarding the GDPR, please visit <https://eugdpr.org/>.

- **Checking and editing your Personal Data**
- **Blocking and deleting the cookies**
- **Permitting or refusing processing of your location data**
- **Erasure, or restriction of our processing, of your data**
- **Objecting to the processing of your Personal Data**
- **Withdrawing your consent**
- **Porting your data to another controller**
- **Lodging a claim with the supervisory authority**
- **Data collected directly by our customers at storage locations**

We strive to ensure that the Personal Data we possess are always accurate and therefore we encourage you to update your information in your own account in case any changes have occurred. We have listed below the rights that you may be able to exercise in respect of the processing of your Personal Data, subject to applicable law. We take every reasonable step to ensure that the Personal Data that we process are limited to the Personal Data that are reasonably required in connection with the purposes set out in this Privacy Policy.

Please note that upon exercising any of the rights listed below, you may be requested to provide additional information for identification purposes. Such additional information shall not be used for any other purpose and will be removed after successful identification.

- **Providing your data:** You may choose not to provide your Personal Data to us. It should be noted that some features of our websites, applications and other services may not be fully available to you if you choose not to provide us with your Personal Data (e.g., we may not be able to process your orders without the necessary details).
- **Right of access:** You may have the right to request access to, or copies of, your Personal Data, together with information regarding the nature, processing and disclosure of those data.
- **Unsubscribing:** We include an unsubscribe link in all electronic marketing messages we send to you. You may withdraw your consent to direct marketing at any time. If you do so, we will promptly update our databases, and will not send you further direct marketing, but we may continue to contact you to the extent necessary for the purposes of any products or services you have requested.
- **Checking and editing your Personal Data:** Should you have an online user account, you may edit and complete your Personal Data directly yourself. If you do not have an online user account, you may contact us, who will upon your request as soon as possible rectify, remove or complete the information which is incorrect, unnecessary, lacking or outdated.
- **Blocking and deleting cookies:** You may block the cookies using your browser settings. Please note that blocking the cookies may affect the usability of our websites. You may also delete the cookies from your browser via its settings, in which case the information collected by the previous cookie will not affect the account created based on the information collected after such deletion.

- **Advertising:** You can opt out of online targeted advertising by opting out within the advertisement itself or by visiting Digital Advertising Alliance, <http://www.aboutads.info/>, the Digital Advertising Alliance of Canada in Canada <http://youradchoices.ca/> or the European Interactive Digital Advertising Alliance in Europe <http://www.youronlinechoices.eu/>. You can also opt out of the Digital Advertising Alliance using your mobile device settings.
- **Allowing use of location data:** You may give your consent to the use of location data in the options of the device or the application. You may also withdraw such consent at any time from the options menu in your account, or by contacting us.
- **Erasure, or restriction of our processing, of your data:** Should you believe that we process your data which is not accurate; the processing is illegal; we are not processing your data in accordance with the processing purpose or you want to oppose the processing, you may contact us to request the erasure, or restrictions on the processing, of your data. Please note that we will investigate your request reasonably promptly, before deciding what action to take.
- **Right to object:** You may have the right to object, on legitimate grounds, to the processing of your Personal Data.
- **Withdrawing your consent:** You may at any time decide to withdraw your consent to the processing of your Personal Data. If your consent is withdrawn, it does not prevent us from processing your Personal Data based on other legal bases, such as fulfilling your orders and storing your order data as required by applicable law. However, it should be noted that your account(s) on our Web Portal will be altered, and advantages granted to you via your account will be reset. Please note that withdrawal of consent does not affect the lawfulness of any processing performed prior to the date on which we receive notice of such withdrawal.
- **Right to data portability:** You may have the right to have your Personal Data transferred to another controller, in a structured, commonly used and machine-readable format, to the extent applicable.
- **Right to Lodge a Complaint:** For EU residents, if you feel that our processing of your Personal Data infringes on data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state where you habitually reside, your place of work or the location of the alleged infringement. If you are located outside of the European Union, you may have rights under privacy laws in the jurisdiction where you live.