

USA Products Group Inc. Privacy Policy

Greetings from USA Products Group Inc.:

We appreciate the trust that you have put in USA Products Group Inc. by using our services. So, each year we update this notice to tell you about our privacy practices, as well as how you can report errors or unauthorized transactions related to your USA Products Group Inc. account.

We know that you care how information about you is used and shared. To help you understand our privacy practices, we have detailed how we collect, use and safeguard your personal and financial information below.

If you have questions or concerns about this information, please contact us by going to usaprogrup.com and clicking on the [Contact Us](#) link or by writing to us at USA Products Group, Attn: Customer Service, 1300 East Vine St. Lodi, CA. 95240. 209-334-1460

Last updated January 26, 2018.

We know that you care how information about you is used and shared, and we appreciate your trust that we will do so carefully and sensibly. This Privacy Policy describes the privacy practices of USA Products Group Inc. and applies to your Website License Agreement and those that are hosted on or made available through our website (collectively, the "Services"). By using our Services, you accept the practices described in this Privacy Policy.

What Personal Information Does USA Products Group Inc. Gather?

The information we learn from you helps us provide, personalize, and continually improve the Services. Here are the types of information we gather:

- **Information You Give Us:** We receive and store any information you enter on our Web site, provide using the Services, or give us in any other way. You can choose not to provide certain information, but then you might not be able to use the Services. We use the information that you provide for such purposes as opening your account, processing your transactions, responding to your requests, and communicating with you.
- **Automatic Information:** We receive and store certain types of information whenever you interact with us. For example, like many websites, we use "cookies," and we obtain certain types of information when your Web browser accesses our Services.
- **Our Communications with Users:** Among other things, we communicate with users on a regular basis via e-mail or SMS to users' wireless devices to provide requested services, and we communicate by phone to resolve user complaints or investigate suspicious transactions. We also use your e-mail address, your phone number or confirmation code to confirm your opening of a USA Products Group Inc. Account, to send information about important changes to our Services, and to send notices and other disclosures required by law. You agree to receive such communications electronically. We may send you promotional messages about new services, offers or opportunities that may interest you. If you do not want to receive promotional messages or other mail from us, please adjust "your communication preferences". However, we reserve the right to send you notices for customer service reasons, including notices about your account or transactions using our Services. Also, to help us make e-mails or SMS messages more useful and interesting, we may receive a confirmation when you open or receive e-mail or SMS messages from us. We also compare our customer list to lists received from other companies, in an effort to avoid sending unnecessary messages to our customers.

- **Information from Other Sources:** We might receive information about you from other sources and add it to our account information.

What About Cookies?

- Cookies are alphanumeric identifiers that we transfer to your computer's hard drive through your Web browser to enable our systems to recognize your browser so we can recognize you as a USA Products Group Inc. user if you return to our site using the same computer and browser.
- The "Help" portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Additionally, you can disable or delete similar data used by browser add-ons, such as Flash cookies, by changing the add-on's settings or visiting the Website of its manufacturer. However, you then may lose the ability to utilize some of our service features, and we recommend that you leave cookies turned on.

Does USA Products Group Inc. Share the Information It Receives?

- Information about our users is an important part of our business, and we will not and are not in the business of selling your information or your customers information to others. We share customer information only as described below and with the family of companies owned and controlled by USA Products Group Inc.
- Disclosure to Other Users: Depending on which payment service you use, you may need to disclose your e-mail address or mobile phone number (or alias) to other users so they can send payments to you. An alias can be used in lieu of a mobile phone number for our mobile payment service. When you send payments, your name, e-mail address, or mobile phone number (or alias) may be disclosed to the intended recipient. Once a transaction is complete, this information will be displayed in the transaction list of the user receiving payment. Mobile phone number and alias information are only disclosed as part of our mobile payments. Our "tag" feature also permits users of a mobile-initiated transaction to view a text reference associated with the transaction on our site.
- Purchases: We do not disclose your financial information (such as credit card information) to any seller or other recipient of payments you make without your prior consent. When you make a purchase, we may make certain other personal information about you available to the recipient to complete the transaction (such as name, e-mail and shipping address), in the event of a dispute regarding the transaction, or as part of a fraud investigation. The use of information that we provide to a recipient will be governed by the agreements or policies of that recipient.
- Third-party Service Providers: We employ financial institutions, other companies and individuals to perform functions on our behalf and transactions that you request or authorize. Examples include sending postal mail, SMS messages and e-mail, analyzing data, providing marketing assistance, processing payment transactions, verifying identity, fraud screening and providing customer service. They have access to personal information needed to perform their functions, but may not use it for other purposes. In addition your wireless carrier may have access to the contents of SMS and/or e-mail messages sent to you as part of our mobile payments option, and their use of such information is subject to their own privacy policies and applicable law.
- Promotional Offers: Sometimes we send offers to selected groups customers on behalf of other businesses. When we do this, we do not give that business your name and address. If you do not want to receive such offers, please unsubscribe by clicking the SafeUnsubscribe link at the bottom of the email.
- Business Transfers: As we continue to develop our business, we might sell or buy businesses, subsidiaries, or business units. In such transactions, user (or other customer) information generally is one of the transferred business assets but remains subject to the promises made in any pre-existing Privacy Policy (unless, of course, you consent otherwise). Also, in the event that USA Products Group Inc. or substantially all of its assets are acquired, user information will of course be one of the transferred assets
- Protection of USA Products Group Inc. and Others: We release account and other personal information when we believe release is appropriate to comply with the law; enforce or apply our User Agreement and other agreements or policies; or protect the rights, property, or safety of our business, our users, or

others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction as well as sharing information with our attorneys, auditors and other representatives. However, this does not include selling, renting, sharing, or otherwise disclosing personally identifiable information from customers for commercial purposes in violation of the commitments set forth in this Privacy Policy.

- With Your Consent: Other than as set out above, you will receive notice when information about you might go to third parties, and you will have an opportunity to choose not to share the information.

How Secure Is Information About Me?

- We work to protect the security of personal information you provide to our web sites during transmission by using Secure Sockets Layer (SSL) software, which encrypts information you input. We restrict access to your personally identifiable information to employees who need to know that information in order to provide products or services to you. We maintain physical, electronic and procedural safeguards to guard your nonpublic personal information.
- It is important for you to take steps to protect against unauthorized access to your account. You should keep confidential your password, security questions, and account PIN if applicable. The security of your USA Products Group Inc. Account relies on your protection of your password, security questions, and PIN. **DO NOT SHARE YOUR PASSWORD OR PIN.** If you do share your password or PIN with a third party for any reason, the third party may have access to your account and your personal information, and you may be responsible for actions taken using your password and PIN. If you believe someone else has obtained access to your password or PIN, please change it immediately by logging in to your account and changing your Profile settings, and also contact us right away.

What About Third-party Advertisers and Links to Other Websites?

Our site may include third-party advertising and links to other web sites. We do not provide any personally identifiable user information to these advertisers or third-party web sites. These third-party web sites and advertisers, or Internet advertising companies working on their behalf, sometimes use technology to send (or "serve") the advertisements that appear on our website directly to your browser. They automatically receive your IP address when this happens. They may also use cookies, JavaScript, web beacons (also known as action tags or single-pixel gifs), and other technologies to measure the effectiveness of their ads and to personalize advertising content. We do not have access to or control over cookies or other features that they may use, and the information practices of these advertisers and third-party websites are not covered by this Privacy Policy. Please contact them directly for more information about their privacy practices. In addition, the Network Advertising Initiative(www.networkadvertising.org) offers useful information about Internet advertising companies (also called "ad networks" or "network advertisers"), including information about how to opt-out of their information collection.

Our websites may display targeted advertising based on personal information about users. Although we do not provide any personal information to advertisers, advertisers (including ad-serving companies) may assume that users who interact with or click on a targeted advertisement meet the targeting criteria used to display the ad (for example, users in the northwestern United States who like classical music).

Which Information Can I Access?

USA Products Group Inc. gives you access to information about your account and your interactions with us for the limited purpose of viewing and, in certain cases, updating that information.

What Choices Do I Have?

- As discussed above, you can always choose not to provide information, even though it might be needed to take advantage of certain services.

- You can add or update certain information on pages such as those listed in the "Which Information Can I Access?" section above. When you update information, we usually keep a copy of the prior version for our records.
- If you do not want to receive e-mail or other mail or messages from us, please Unsubscribe to the communication. You may not opt-out of receiving customer service messages related to your account or transactions or other legal notices from us.
- The Help portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Additionally, you can disable or delete similar data used by browser add-ons, such as Flash cookies, by changing the add-on's settings or visiting the Website of its manufacturer. However, you then may lose the ability to utilize some of our service features, and we recommend that you leave cookies turned on.

User Agreement, Notices and Revisions

- If you choose to visit our web sites or use our Services, your visit and any dispute over privacy is subject to this Privacy Policy and the applicable end user agreement, including limitations on damages and application of the law of the state of California. If you have any concern about privacy at USA Pro, please contact us with a thorough description, and we will try to resolve it.
- Our business changes constantly and our Privacy Policy will change also. We may e-mail or send SMS messages with periodic reminders of our notices and conditions. You should check our site frequently to see recent changes. Unless stated otherwise, our current Privacy Policy applies to all information that we have about you and your account. We stand behind the promises we make, however, and will never materially change our policies and practices to make them less protective of user information collected in the past without the consent of affected users.

Examples of Information Collected

- **Information You Give Us:** You provide most such information when you open an account, use the Services, or communicate with customer service. For example, to open a USA Products Group Inc. Account, you must provide your name, address, and an e-mail address. To make certain payments through us, you must provide credit card or bank account information. We also may ask you to choose security questions to answer before we process transactions, issue you a new password or provide you with customer service. We also collect information that may be necessary for us to verify your identity and comply with the U.S.A. Patriot Act and Bank Secrecy Act. Such information may include name, address, date of birth, social security number, and/or driver's license number. We may ask you to send us additional information (such as a credit card statement and/or a recent utility bill or other information linking you to an address in your account). We also may ask you to answer additional questions online to help verify your identity. We may sometimes offer optional questionnaires and surveys to our users to collect information for analytical purposes, such as demographic information. If we collect personally identifiable information from our users in these questionnaires and surveys, the users will be given notice of how the information will be used prior to their participation in the survey or questionnaire.
- **Automatic Information:** Examples of the information we collect and analyze include the Internet protocol (IP) address used to connect your computer to the Internet; login; e-mail address; password; computer and connection information such as browser type and version, operating system, and platform; transaction history, which we sometimes aggregate with similar information from other users or website visitors; the full Uniform Resource Locator (URL) clickstream to, through, and from our Web site, including date and time; cookie number; and the phone number you used to call our toll free number. We may also use browser data such as cookies, Flash cookies (also known as Flash Local Shared Objects), or similar data on certain parts of our Website for fraud prevention and other purposes. During some visits we may use software tools such as JavaScript to measure and collect session information, including page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page. When you visit a third-party Web site that uses one of our Services, your browser may send

information such as your page request, URL, IP address, browser type, browser language, the date and time of your request, and your cookie information.

- **Information from Other Sources:** We might receive information about you from other sources and add it to our account information. For example, in order to protect against potential fraud, we may verify with third party services the information you provide. During the verification process we receive personally identifiable information about you from such services. For example, if you register a credit card or debit card with us, we may use card authorization and fraud screening services to verify that your card information and address matches the information that you supplied to us, and that the card has not been reported as lost or stolen. In addition, we, at our sole discretion and subject to applicable law, reserve the right periodically to retrieve and review a credit report or other credit history information from credit bureaus for any account.