

## BOLLMAN HAT COMPANY – OUR PRIVACY POLICY

### INTRODUCTION

Bollman Hat Company respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data and tell you about your privacy rights, and how the law protects you. It applies to information we collect in relation to:

- Our customers;
- Users of our websites bollmanhats.com (the “sites”);
- Employees or representatives of organizations who use our services or supply us with goods or services;
- People who contact us via any medium (e.g. by post, email, telephone or social media).

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information. This privacy policy supplements the other notices and is not intended to override them. This version was last updated in October 2018. We reserve the right to update this privacy policy at any time.

### 1. IMPORTANT INFORMATION

#### Controller

Bollman Hat Company, a corporation whose registered office is located at 110 East Main Street, Adamstown PA 19501 USA, is the controller of and responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy policy). Our contact information appears in paragraph 10 of this policy.

#### Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit

### 2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes information about the transaction or matter you instruct us on and/or other services we provide to you, information about products or services you provide to us and details about payments to and from you.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data because this

data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

Unless such information is required for the purposes of a particular transaction, we do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Where we need to process such information for the purposes of a particular transaction we will only do so where we have obtained your prior explicit consent to do so, or where we are otherwise legally permitted to do so. We do not collect any information about criminal convictions and offenses.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a sales order you have with us, but we will notify you if this is the case at the time.

## **3. HOW IS YOUR PERSONAL DATA COLLECTED?**

We use different methods to collect data from and about you including through:

**Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- when you purchase products from us
- provide goods or services to us;
- subscribe to our service or publications;
- follow us on Twitter, Facebook or other social media;
- request marketing to be sent to you;
- provide us with feedback.

**Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

Cookies are small files that websites can send to your computer, which can enhance your experience of a website by, for example, remembering who you are and what you are interested in. Our website only uses cookies for statistical and analytical purposes, for example to identify which pages and features of the website are the most popular. These cookies do not collect any personal information about you such as your name or address. Some cookies, such as login cookies or cart session cookies, may stay on your hard drive to track return visits and streamline your shopping experience. If you wish, you are able to reject or disable cookies by adjusting your browser settings, however, this may adversely affect your experience of using our website. If you are not sure how to do this, then the Help Files on your browser should assist, or alternatively, visit <http://www.allaboutcookies.org> for more information about cookies including instructions on disabling cookies.

**Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from analytics providers based outside the EU, such as Google.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.

- Identity and Contact Data from search information providers, for example Google.
- Identity and Contact Data from publicly available sources such as Companies House, the Financial Conduct Authority and the Electoral Register based inside the EU.
- Identity and Contact Data from credit reference or crime and fraud prevention agencies.

#### 4. HOW WE USE YOUR PERSONAL DATA

##### Lawful bases

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party), by which we mean in the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
- Where we need to comply with a legal or regulatory obligation that we are subject to.

Generally, we do not rely on consent as a legal basis for processing your personal data, except in some instances, such as when you sign up for our email list without making a purchase on our sites. You have the right to withdraw consent (when consent is the lawful basis for processing your personal data) and to opt out of marketing at any time by making use of the “unsubscribe” link in emails or by contacting us via any of the methods referred to in paragraph 10 below.

##### Purposes for which we will use your personal data

We have set out below, in a table format, a description of the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Please note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer including verifying your identity for anti-money laundering purposes	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation
To provide our services to you including to: (a) Manage payments, fees and charges (b) Collect and recover money owed to us (c) Correspond with you	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To obtain products or services from you or your organisation including to: (a) Manage payments, fees and charges (b) Place orders	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to keep our records updated)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (a) Asking you to leave a review or take a	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers and prospective customers and other persons use our services)

survey		
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	(a) Consent (b) Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, client and business relationships and experiences	(a) Technical (b) Usage	(a) Consent (b) Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	(a) Consent (b) Necessary for our legitimate interests (to develop our services and grow our business)

## Marketing

We have established the following personal data control mechanisms in connection with our marketing:

- **Promotions:** We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. You will receive marketing communications from us if you have requested information from us or received services from us or if you provided us with your details when you registered to receive promotional event, and, in each case, you have not opted out of receiving that marketing.
- **Third-party marketing:** We do not share your personal data with third parties for marketing purposes.
- **Opting out:** You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data you have provided to us for the purposes of our providing services to you.
- **Cookies:** You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. For more information about the cookies we use, see Automated technologies or interactions section in paragraph 3 above.

## Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5. **DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Service providers acting as processors based the United Kingdom who provide IT and system administration services.
- Third parties who fulfil orders placed on our sites.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- US Federal Government, HM Revenue & Customs, regulators and other authorities.
- Credit reference or fraud and crime prevention agencies.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

## 6. **INTERNATIONAL TRANSFERS**

If we transfer your personal data outside the European Economic Area (EEA), we will ensure that a similar degree of protection is afforded to your personal data by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

We process information entered on our sites in accordance with this policy. We do not consider this to be a “transfer” of personal data outside the EEA.

## 7. **DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8. **DATA RETENTION**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements to determine the appropriate retention period for personal data. Please contact us if you would like further information in this regard.

## 9. **YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you

to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, although we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where the personal data are no longer necessary in relation to the purposes for which they were collected. You also have the right to ask us to delete or remove your personal data where you withdraw your consent on which processing was based and no other legal ground for processing your personal data exists, where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully, or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party), and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- if you want us to establish the data's accuracy;
- where our use of the data is unlawful, but you do not want us to erase it;
- where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
- you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

**No fee usually required/Confirmation of Identity**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

**Complaints**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

**10. CONTACT INFORMATION**

Should you wish to exercise any of your legal rights, or if you have any questions or complaints in relation to how we use your personal information or this privacy policy, please write to us or e-mail us at the following addresses:

David A Huber  
CFO/COO  
Bollman Hat Company  
110 East Main Street  
Adamstown PA 19501 USA

Email address: [GlobalComplianceEthics@bollmanhats.com](mailto:GlobalComplianceEthics@bollmanhats.com)

Telephone number: 717-484-4361