

# ROSS ROOF GROUP LIMITED

## ONLINE U.S. PRIVACY NOTICE

*Last updated August 31, 2021*

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### 1. INTRODUCTION.

- (a) **Web Site Owner.** Ross Roof Group Limited ("**RRG**," "**we**," "**us**," or "**our**") is the owner of this web site (the or this "**Web Site**"). We can be contacted by mail at Ross Roof Group Limited, PO Box 72062, Papakura 2244, 1C Inlet Road, Takanini 2112, New Zealand, by phone at +64 9 299 9498, or by e-mail at [info@rossroofgroup.com](mailto:info@rossroofgroup.com). This online privacy notice discloses RRG information practices for this Web Site, including what type of personal identifiable information is requested in order to utilize the Web Site, how the information is used, and with whom the information is shared. Please be advised that other RRG web sites may be governed by privacy notices containing different information practices applicable to those sites.
- (b) **Web Site Visits.** We will usually only collect personally identifiable information directly from you. We may also collect certain information from third parties where it is unreasonable or impractical to collect such information from you directly, where you have authorized collection from such third parties, where those third parties are marketing service providers or data resellers whose data we use for marketing or research, or from publicly available sources. This includes, but is not limited to, the home server domain name, e-mail address, type of computer and web browser, what pages visitor accessed, and limited information about search requests. This information is used to solve technical problems and to calculate overall usage statistics.
- (c) **Web Site Transactions.** At times, RRG will need personal information regarding a customer or a prospect. For example to process an order or provide a subscription, RRG may need to know a customer's name, mailing address, e-mail address and credit card or other payment details. It is our intent to inform you before we collect personal information. If you tell us that you do not wish to have this information used as a basis for further contact with you, RRG will respect your wishes. Opt out procedures are set forth in Section 7(b) herein.

### 2. PERSONAL INFORMATION THAT MAY BE COLLECTED.

- (a) **Identifying Information.** In order to make a purchase or to access designated subscriber services and/or restricted areas within the Web Site, we may request a user to provide certain personal identifying information, which may include: name, postal address, e-mail address, screen name, password,

telephone number, facsimile number, method of payment, and, if applicable, credit card number or other payment details. We may also request additional information necessary to establish and maintain the customer's account.

- (b) **Service Quality Monitoring.** Some Web Site transactions may require a customer to telephone RRG, or RRG to call the customer. RRG will not contact you by telephone without your prior consent, except to confirm an order placed online and/or to inform you of the status of such order. Customer should be aware that it is our practice to monitor, and in some cases record such calls for staff training or quality assurance purposes.
- (c) **Information from Children.** RRG does not collect or maintain information from users actually known to be under the age of 13, and no part of the Web Site is structured to attract anyone under the age of 13.
- (d) **Lost or Stolen Information.** Help keep your personal information accurate. If your personal information has changed, please e-mail the new information to us at [info@rossroofgroup.com](mailto:info@rossroofgroup.com). If you would like to review the personal information we possess in our files for you, e-mail your request to [info@rossroofgroup.com](mailto:info@rossroofgroup.com) together with the description of a recent purchase.
- (e) **Forums, Blogs, and Social Media.** If you participate in an RRG discussion forum, or posts messages to an RRG blog or social media account, you should be aware that the information disclosed and shared will be broadly available to other persons, both inside of and/or outside RRG, who have access to that forum, blog, or social media page. Also, a participant's expressed opinion is their own and should not be considered as reflecting the opinion of RRG.
- (f) **Links to Other Web Sites.** This Web Site may contain links to other web sites. RRG is not responsible for the privacy practices or the content of those other Web sites.

### **3. USES MADE OF THE INFORMATION.**

- (a) **Limited Uses Identified.** Without your prior consent, we will not use your personally identifiable information for any purpose other than that for which it is submitted. We use personally identifiable information to reply to inquiries, handle complaints, provide operational notices and in program record-keeping. We also process billing and business requests related to participation on this Web Site. We also may use personally identifiable information to track usage of our Web Site.
- (b) **Marketing Uses.** Unless a customer elects to opt-out pursuant to Paragraph 7(b) herein, RRG reserves the right to provide customers with information about RRG's Web Site, products and services, and related information in which a customer has indicated an interest.

The information you provide to the Web Site may also be collected, used, analyzed and/or processed by RRG, or selected third parties on RRG's behalf

(such as marketing automation platforms and Google Analytics), for marketing and other business purposes. Customers wishing not to have personal identifying information used in this way should follow the opt-out instructions provided in Paragraph 7(b).

- (c) **Stored Information Uses.** RRG stores the information provided by customers. This information is used to compile a customer's purchase history in order to enable us to recommend products, services, or special offers that would be of interest to a customer.
- (d) **Online Advertising.** Some companies that help RRG deliver interactive on-line advertising, such as banner ads, may collect and use information about our customers to help us better understand the types of advertising or promotions that are most appealing to our customers. After it is collected the information is aggregated so it is not identifiable to a specific individual. If, however, one prefers that these companies not collect such information, customers should follow the opt-out instructions provided in Paragraph 7(b).

#### **4. DISCLOSURE OF THE INFORMATION.**

- (a) **Within Corporate Organization.** RRG is a multinational organization, with legal entities, business processes, management structures, and technical systems that cross borders. RRG may share your personal information within RRG's corporate organization and with affiliates, and may transfer the information to countries in the world where RRG conducts business. Some countries may provide less legal protection for customer personal information. In such countries, RRG will still handle customer personal information in the manner describe herein.
- (b) **Mergers and Acquisitions.** For the purpose of developing and expanding its business, RRG may share, rent, sell or buy business assets or stock. In such transactions, customer information is generally one of the transferred business assets. Also, in the event RRG is acquired by another entity, customer information will be one of the transferred assets.
- (c) **Agents.** RRG employs or engages other companies and individuals to perform business functions on behalf of RRG. These persons are provided with personal identifying information required to perform their functions but are prohibited by contract from using the information for other purposes. These persons engage in a variety of functions which include, but are not limited to, fulfilling orders, delivering packages, removing repetitive information from customer lists, analyzing data, providing marketing assistance, processing credit card payments or other types of payments and providing customer services.
- (d) **Affiliated Businesses.** RRG may work closely with affiliated businesses operating web site stores, providing services or selling products on each other's Web sites. These businesses identify themselves to customers.

Customer information related to a transaction with an affiliated business is shared with that affiliated business.

- (e) **Marketing Analysis by Third Parties.** RRG reserves the right to disclose to third parties personal information about customers for marketing analysis; however, any information disclosed will be in the form of aggregate data that does not describe or identify an individual customer.
- (f) **Disclosure to Governmental Authorities.** Under certain circumstances, personal information may be subject to disclosure pursuant to a judicial or other government subpoenas, warrants or orders.

## **5. USE OF COMPUTER TRACKING TECHNOLOGIES.**

- (a) **No Tracking of Personal Information.** This Web Site is not set up to track, collect or distribute personal information not entered by visitors. Our site logs do generate certain kinds of non-identifying site usage data, such as the number of hits and visits to our sites. This information is used for internal purposes by technical support staff to provide better services to the public and may also be provided to others, but, again, the statistics contain no personal information and cannot be used to gather such information.
- (b) **Use of Cookies.** RRG, or its third party vendors, collects non-identifiable and personal information through the use of various technologies, including "cookies". A cookie is an alphanumeric identifier that a Web site can transfer to a customer's hard drive through the customer's browser. The cookie is then stored on the customer's computer as an anonymous tag that identifies the customer's computer, but not the customer. Cookies may be sent RRG or its third party vendors. Customers can set their browser to notify before a cookie is received, giving an opportunity to decide whether to accept the cookie. Customers may also set their browser to turn off cookies; however, some Web sites may not then work properly.
- (c) **Use of Web Beacon Technologies.** RRG may also use Web beacon or other technologies to better tailor the Web Site to provide better customer service. If these technologies are in use, when a visitor accesses these pages of the Web Site, a non-identifiable notice of that visit is generated which may be processed by RRG or by its vendors/suppliers. Web beacons usually work in conjunction with cookies. If a customer does not want cookie information to be associated with the customer's visits to these pages, the customer can set its browser to turn off cookies; however, Web beacon and other technologies will still detect visits to these pages, but the notices they generate cannot be associated with other non-identifiable cookie information and are disregarded.
- (d) **Collection of Non-Identifiable Information.** RRG may collect non-identifiable information from user visits to the Web Site in order to provide better customer service. Examples of such collection include: traffic analysis, such

as tracking of the domains from which users visit, or tracking numbers of visitors; measuring visitor activity on the Web Site; Web Site and system administration; user analysis; and business decision making. Such information is sometimes known as "clickstream data." RRG or its contractors may use this data to analyze trends and statistics.

- (e) **Collection of Personal Information.** RRG collects personal identifying information from customers during a transaction. We may extract some personally identifying information about that transaction in a non-identifiable format and combine it with other non-identifiable information, such as clickstream data. This information is used and analyzed only at an aggregate level (not at an individual level) to help us understand trends and patterns. This information is not reviewed at an individual level.

## **6. INFORMATION SECURITY.**

- (a) **Commitment to Online Security.** RRG works to protect the security of customer personal information during transmission by employing software which encrypts the information that customers and prospects input. Our practice is to reveal only the last five digits of customer's credit card numbers when confirming an order. During order processing the entire credit card number is revealed to the credit card company selected by customer.
- (b) **No Liability for Acts of Third Parties.** RRG will exercise all reasonable efforts to safeguard the confidentiality of customer personal information. However, transmissions protected by industry standard security technology and implemented by human beings cannot be made absolutely secure. Consequently, RRG shall not be liable for unauthorized disclosure of personal information due to no fault of RRG including, but not limited to, errors in transmission and unauthorized acts of RRG staff and/or third parties.

## **7. PRIVACY POLICY CHANGES AND OPT-OUT RIGHTS.**

- (a) **Changes to Privacy Policy.** This privacy notice was last updated on August 27, 2021. We reserve the right to change or update this privacy policy statement at any time. A notice of such change will be posted on the Web Site home page for thirty (30) days prior to the implementation of such change.
- (b) **Opt-Out Right.** Customers and/or prospective customers have the right at any time to cease permitting personal information to be collected, used or disclosed by us and/or by any third parties with whom we have shared and/or transferred such personal information. Right of cancellation may be exercised by contacting Ross Roof Group Limited via e-mail [info@rossroofgroup.com](mailto:info@rossroofgroup.com), or via certified mail to Ross Roof Group Limited, PO Box 72062, Papakura 2244, 1C Inlet Road, Takanini 2112, New Zealand, by phone at +64 9 299 9498. After processing the cancellation, we will delete customer or prospective customer's personal information from our data base.

## 8. ACCESS RIGHTS TO DATA.

- (a) **Information Maintained by RRG.** Upon a customer's verifiable request, we will provide a reasonable description of the customer's personally identifiable information that RRG maintains in its data bank. We can be contacted for such requests by e-mail at [info@rossroofgroup.com](mailto:info@rossroofgroup.com) or via certified mail to Ross Roof Group Limited, PO Box 72062, Papakura 2244, 1C Inlet Road, Takanini 2112, New Zealand, by phone at +64 9 299 9498.
- (b) **Corrections and Changes to, or Deletion of, Personal Information.** Help us to keep your personal information accurate. If your personal information changes, or if you note an error upon review of your information that we have on file, please promptly e-mail us at [info@rossroofgroup.com](mailto:info@rossroofgroup.com) and provide the new or correct information. Should you wish to delete any personal information which we have collected from you, please contact us by e-mail at [info@rossroofgroup.com](mailto:info@rossroofgroup.com) or phone +64 9 299 9498 to make the request.
- (c) **Your California Privacy Rights.**
  - (i) **California "Shine the Light" Law.** Beginning on January 1, 2005, California Civil Code Section 1798.83 permits customers of RRG who are California residents to request certain information regarding our disclosure of personal information for direct marketing purposes. To make such a request, please write to: Ross Roof Group Limited, PO Box 72062, Papakura 2244, 1C Inlet Road, Takanini 2112, New Zealand or by e-mail at [info@rossroofgroup.com](mailto:info@rossroofgroup.com). Within thirty (30) days of receiving such a request, we will provide a list of the categories of personal information disclosed to third parties for third-party direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of these third parties. This request may be made no more than once per calendar year. RRG reserves its right not to respond to requests submitted other than to the address specified in this paragraph.

California's privacy laws require a company to provide notice to California users of their rights to receive information and to which entities their information was shared for marketing purposes.
  - (ii) **California Consumer Privacy Act of 2018.** Additional California law, specifically the California Consumer Privacy Act of 2018 and its related regulations (the "**CCPA**"), requires RRG to disclose information regarding the categories of personal information that we have collected about California customers in the past twelve (12) months and the purposes for which the categories of personal information shall be used, and the CCPA requires us to describe how a visitor to the Web Site can review, access, and request changes to or deletion of their personal information as previously submitted to and collected by us. While the CCPA requires RRG, upon a customer's verifiable request, to provide all personal information maintained in its data bank, we shall not be required to

provide personal information to a customer more than twice in a 12-month period.

- (iii) **California "Do Not Track" Disclosures.** We are committed to providing you with meaningful choices about the personal information collected on our Web Site, that is the opportunity to request any personal information collected by us and to opt out of our data collection activities. However, we do not recognize or respond to browser-initiated Do Not Track signals, as the Internet industry is currently still working on Do Not Track standards, implementations, and solutions.

## **9. ACCOUNTABILITY.**

- (a) **Questions, Problems and Complaints.** If you have a question about this policy statement, or a complaint about our compliance with this privacy notice, you may contact us by e-mail [info@rossroofgroup.com](mailto:info@rossroofgroup.com).
- (b) **Terms of Use.** If a customer chooses to enter into a transaction for RRG products or services, the customer's action is hereby deemed acceptance of RRG's practices described in this policy notice. Any dispute over privacy between a customer and RRG is subject to the provisions of this notice which is hereby incorporated herein.