



PEP - Privacy and Cookie Policy

Last Revised: May 15, 2018

PEP Filters, Inc. (“**PEP**”, “**we**”, “**our**”) respects the privacy of its users and is committed to protect its users’ information. We believe that you have a right to know our practices regarding the information we may collect and use when you use our primary website at <https://pepfilters.com/> (and its subdomains) (the “**Site**”). Please read the following carefully to understand PEP’s views and practices regarding your personal information and how PEP will treat it.

Table of Content

- 1 [Who we are](#)
- 2 [Your acknowledgment of this policy \(important, please read!\)](#)
- 3 [Which information may we collect about Users?](#)
- 4 [How do we collect information about our Users?](#)
- 5 [What are the purposes of the collection and processing of information?](#)
- 6 [Sharing Personal Information with Third Parties](#)
- 7 [Your Rights](#)
- 8 [Location of Your Data](#)
- 9 [Minors](#)
- 10 [Third Party Service Providers and Third Party Software](#)
- 11 [Links to Third Party Websites](#)
- 12 [Cookies & Local Storage](#)
- 13 [Security](#)
- 14 [Data retention](#)
- 15 [Changes to the Privacy Policy](#)
- 16 [Have any Questions?](#)

1. Who we are

In this policy, references to PEP, or to "we" or "us" are to PEP Filters, Inc., which is a registered company in the state of South Carolina, USA. Individuals wishing to contact us about data protection issues may do so by writing to us at the above address or by emailing us at pepusa@pepfilters.com.

2. Your acknowledgment of this policy (important, please read!)

This Privacy and Cookie Policy (“**Privacy and Cookie Policy**”) details how your Personal Information collected via the Site is used and processed by PEP and/or its affiliates worldwide.

BY ENTERING, CONNECTING TO, ACCESSING OR USING THE SITE, YOU ACKNOWLEDGE THAT YOU ARE OR HAVE HAD THE OPPORTUNITY TO BECOME AWARE OF AND AGREE (IN JURISDICTION WHERE SUCH CONSENT IS REQUIRED) TO THIS

PRIVACY AND COOKIE POLICY AND PEP'S PRACTICES DESCRIBED THEREIN, INCLUDING THE PROCESSING (INCLUDING COLLECTING, USING, DISCLOSING, RETAINING OR DISPOSING) OF YOUR INFORMATION UNDER THE TERMS OF THIS POLICY.

3. Which information may we collect about Users?

We may collect from Users of our Site, two types of data and information:

3.1. **Non-personal Information.** The first type is non-identifiable and anonymous information. To put it simply, we have no idea what is the identity of the User from which we have collected the Non-personal Information, unless it is cross-referenced with Personal Information. Non-personal Information, which is being gathered, consists of technical information and behavioral information that does not pertain to a specific individual. For example, technical information may include information such as the type and version of your device and its operating system, the type of browser, screen resolution, device browser and keyboard language, Wi-Fi connectivity and the type and name of your device and/or browser, etc. Behavioral information may include the User's click-stream on the Site, the activities of the User on the Site and additional information of a similar nature.

3.2. **Personal Information.** The other type of information we may collect is individually identifiable information. To put it simply, this information may identify an individual or is of a private and/or sensitive nature, such as your contact information ("**Personal Information**"). Personal Information which is being gathered consists of any personal details provided voluntarily by the User during the User's use of the Site, including:

3.2.1. Personal Information which is provided voluntarily:

- **Communications with PEP:** information you provide us as part of any communications with PEP, including by approaching to the customer services or during sales calls. We may record such calls for quality assurance purposes and in order to improve our services.
- **Contact Form:** information you provide us when filling the Contact Form available on our Site. The Contact Form may require you to provide the following details: full name, e-mail address, phone number, state, country and company name. A free text message may also be provided.

3.2.2. Personal Information collected via technology:

- **Geolocation data:** while using the Site we will access, collect, process, monitor and/or remotely store "geolocation data", including through the collection of IP addresses and other similar information to determine your location for the purpose of providing a localized version of our Site and for security purposes.
- **Technical and behavioral information:** to the extent that the technical and behavioral information detailed above will be linked to or associated with a specific individual then such information will be considered as Personal Information.
- **Identifiers:** such as Internet Protocol (IP) address, your Unique Device Identifier (UDID), or another unique identifiers.

3.3. Please note:

- We may cross-reference Personal Information with other Personal Information we have about you and any Non-personal Information connected or linked to or associated with any Personal Information shall be deemed as Personal Information as long as such connection, linkage or association exists.
- We use third-party tracking services and usage logs, to track and analyze data from Users of the Site and for purposes of security and fraud prevention (for more information please refer to Section 10 below). We may also use cookies to gather information regarding your

use of the Site and the information for which you searched and accessed (for more information please refer to Section 11 below).

4. How do we collect information about our Users?

There are two main methods we use to collect information:

- 4.1. **We collect information through your entry, connection, access and/or use of the Site.** In other words, when you access or use the Site we are aware of your usage of the Site, and may gather, collect and record the information relating to such usage. For example, when you use the Site, we may gather your click-stream.
- 4.2. **We collect information which you provide us voluntarily.** For example, we collect Personal Information that you provide via the Contact Form on our Site. We will inform you prior to collecting your Personal Information if it is requested on a voluntary basis and the consequences of not providing voluntary Personal Information.

5. What are the purposes of the collection and processing of information?

5.1. Non-personal Information is processed in order to:

- Enhance the User's experience on the Site;
- Create statistical information and learn about the preferences of Users and general trends on the Site (e.g. understand which features are more popular than others); and
- Keep the Site safe and secured and for prevention of fraud.

5.2. Personal Information is processed in order to:

- Enable the operation of the Site;
- Contact you for the purposes of offering you our products and services by email, SMS, phone, through web-browser notification or through the post (having first obtained your consent and subject to your right to opt-out of marketing messages at any time by following the instructions in such message or by contacting us at: privacy@PEP.com;
- Personalize your experience on the Site (e.g. geolocation data shall be used to provide you with a localized version of the Site (where available));
- Ensure that content on the Site is presented in an optimal way for you and for your device (e.g. tablet, mobile phone);
- Send you by email, SMS, phone, through web-browser notification or through the post updates, notices, announcements, and additional information related to PEP including with respect to changes made to our Site's terms of use and privacy policy;
- Conduct internal operations, including troubleshooting, data analysis, testing, research and statistical purposes;
- Keep the Site safe and secured and for prevention of fraud and crime;
- Comply with our legal obligations and in order to be able to protect our rights and legitimate interests, including in order to improve the Site;
- Email tracking – we may use tracking technology within the email we may send you in order to improve interactions with you and to better understand whether our emails were opened and read, and such tracking may include capturing the time and date in which you opened our email messages and the type of device you use to open such emails.

Note to our Users in the EU:

In order for PEP to process your Personal Information, as detailed herein, such processing must be justified by a "basis" for processing. Please note that the Personal Information processing activities

detailed herein may be justified on the basis that:

- the processing is based on your consent - where you provide us with your consent to contact you for marketing purposes or when we use cookies to collect information about your use of the Site, you will be asked to consent to such activities before we can process such information. If you choose not to give us your consent for such processing activities, or if you decide later to remove your consent, this may affect our ability to provide you with the services available on our Site;
- the processing is necessary for performance of a contract or in order to take steps prior to entering into a contract - usually your Personal Information will be provided to us because you are interested in engaging with PEP for the purchase of our products and services. As such, we rely on this basis for processing activities that are required in order enable you to use the Site and to let you know of changes to our Site's terms of use and privacy policy;
- the processing is necessary to comply with a legal obligation - we may process your Personal Information for disclosure of information to authorities; and
- the processing is in our legitimate commercial interests - subject to your interests and fundamental rights, we shall process your Personal Information under this basis with respect all other Personal Information processing activities described herein, such as the processing of your Personal Information in order to personalize the Site, assisting us to prevent crime and fraud, complying with regulatory requirements, our internal operations, maintaining records and email tracking. We may also use the information contained in cookies and other such files or tags consists based on such ground for our legitimate interests in a safe and user-friendly presentation of our Site

Note to non-EU Users:

BY ENTERING, CONNECTING TO, ACCESSING OR USING THE SITE, YOU CONSENT TO THE COLLECTION AND PROCESSING OF YOUR PERSONAL INFORMATION AS SPECIFIED HEREIN.

6. Sharing Personal Information with Third Parties

- 6.1. PEP respects your privacy and will not disclose, share, rent, or sell your Personal Information to any third party, other than as permitted under this Privacy and Cookie Policy.
- 6.2. In addition to using the information collected by us for the purposes described under Section 4 above, we may also share your information in the following cases:
 - Group Companies: the Personal Information you provide to us may be accessed by members of our group of companies in order to fulfill the purposes detailed herein.
 - Local Distributors, Dealers and Sales Representatives: When you provide us with your contact details via the Site or make certain requests for information about PEP products or services, we may transfer your name and contact information to the local distributor, dealer or sales representative of PEP products and services that is located close to your location, solely in order to enable us to respond to your request. We identify the nearest distributor, dealer or sales representative using the location that you provided us. Please note that we instruct our local distributors, dealers and sales representatives to maintain appropriate data security safeguards in place and they are contractually restricted from using your Personal Information for any purpose other than in order to offer you PEP's products and services, and/or in order to respond to any other specific request that PEP has received from you. We note that such distributors, dealers and sales representatives may separately ask you to provide your name and contact information for other marketing activities. Any information that you may transfer to them directly will be used by them according to their privacy practices and PEP will not be responsible for their use of such information.

- **PEP Personnel:** Personal Information that we collect and process may be transferred to or accessed by personnel of PEP for the sole purpose of enabling the operation of the Site and to contact you (as detailed in Section 4 above). Please note that all PEP personnel that will have access to your Personal Information are under an obligation of strict confidentiality with respect to such Personal Information.
- **Service Providers:** we share Personal Information with vendors, commercial software providers, consultants and data processors who perform services on our behalf, including without limitation, companies that provide analysis, messaging services and services which host the Site. Please note that we collect, hold and manage your Personal Information through a third party's cloud based services, as reasonable for business purposes, which may be located in countries outside of your jurisdiction. For more information regarding our Service Providers, please refer to Section 10 below.
- **In addition, we may share Personal Information in the following cases:** (a) to satisfy any applicable law, regulation, legal process, subpoena or governmental request; (b) to enforce this Privacy and Cookie Policy or any other agreement or terms of service between you and PEP, and to defend against any claims or demands asserted against us by you or on your behalf; (c) to detect, prevent, or otherwise address fraud, security or technical issues; (d) to protect the rights, property, or personal safety of PEP, its Users or the general public; and (e) when PEP is undergoing any change in control, including by means of merger, acquisition or purchase of all or substantially all of the assets of PEP (while such acquired company or investor may be located in countries outside of your jurisdiction).

6.3. For avoidance of doubt, PEP may transfer and disclose **Non-personal Information** to third parties at its discretion including without limitation for statistical, analytical and research purposes and for customization, developing and improvement of our Site.

7. **Your Rights**

PEP acknowledges you have the right to access and change the Personal Information we collect and process. **If you wish to access or to correct, amend, or delete Personal Information, please send us an email to: pepusa@pepfilters.com** and we will respond within a reasonable timeframe, but in any event no later than permitted by applicable law.

Note to our Users in the EU:

We hereby inform you of the following rights (by virtue of EU law), in respect of your Personal Information:

- **Right to access:** you may have the right to request a review of your Personal Information held by PEP.
- **Right to rectification:** if the Personal Information processed by PEP is incorrect, incomplete or not processed in compliance with applicable law or this Privacy and Cookie Policy, you may have the right to have your Personal Information rectified.
- **Right to erasure:** under certain conditions, you may be entitled to require that PEP will delete or "block" your Personal Information (e.g. if the continued processing of those data is not justified).
- **Right to Portability:** you may have the right to transfer your Personal Information between data controllers (i.e. to transfer your Personal Information to another entity).
- **Right to object to or withdraw consent:** where that lawful basis for processing your Personal Information is either "public interest" or "legitimate interests", those lawful bases are not absolute, and you may have a right to object to such processing. If the processing of your Personal Information is based on your consent, you have the right to withdraw your consent to such processing at any time.
- **The right to restrict processing** – under certain circumstances, you may have the right to

object to the processing of your Personal Information due to your particular situation.

- Right to lodge a complaint: you have the right to lodge a complaint before the relevant data protection authority or supervisory authority.

To exercise these rights, where applicable, please contact us by sending an email to:
pepusa@pepfilters.com

8. Location of Your Data

The information collected from you by PEP, as detailed in this Privacy and Cookie Policy, may be transferred to, and stored at, servers which may be located in countries outside of your jurisdiction and in a country that is not considered to offer an adequate level of protection under your local laws. It may also be processed by PEP and its suppliers, service providers or partners' staff operating outside your country.

PEP is committed to protecting your Personal Information and will take appropriate steps to ensure that your Personal Information is processed and stored securely and in accordance with applicable privacy laws, as detailed in this Privacy and Cookie Policy. Such steps include putting in place data transfer agreements or ensuring our third-party service providers comply with PEP's data transfer protection measures. If you are located in the EU, you have a right to request further information regarding the data transfer mechanisms used by us with respect to data transfers to third countries.

Note to our Users in the EU:

In order to keep your Personal Information safe, we apply strict safeguards when transferring it outside of the EEA, which may include the following:

- Transferring your personal information to countries approved by the European Commission as having adequate data protection laws;
- Entering into standard contracts that have been approved by the European Commission and which provide an adequate level of high quality protection, with the recipients of your Personal Information;
- Transferring your Personal Information to organizing that are Privacy Shield Scheme certified, as approved by the European Commission.

BY SUBMITTING YOUR PERSONAL INFORMATION THROUGH THE SITE, YOU ACKNOWLEDGE, AND AGREE, IN JURISDICTION WHERE SUCH CONSENT IS REQUIRED, TO SUCH TRANSFER, STORING AND/OR PROCESSING OF PERSONAL INFORMATION.

9. Minors

The Site is intended for Users over the age of sixteen (16). Therefore, PEP does not intend and does not knowingly collect directly Personal Information from children under the age of sixteen (16) and does not wish to do so. We reserve the right to request proof of age at any stage so that we can verify that minors under the age of sixteen (16) are not using the Site.

10. Third Party Service Providers and Third Party Software

- 10.1. While using the Site we may be using third party service providers, who may collect, store and/or process your information, as detailed in this Privacy and Cookie Policy.
- 10.2. Note, that we collect, hold and/or manage your Personal Information through PEP's authorized third parties vendors of certain products or services (such as hosting cloud services) (including, as applicable, their affiliates) solely and limited to providing us with such requested services, and not for any other purposes.
- 10.3. Such vendors may be located in a country that does not have the same data protection laws as your jurisdiction.

11. Links to Third Party Websites

Certain links provided in the Site permit Users to leave our Site and enter non-PEP sites or services. Those linked sites and services are provided solely as a convenience to you. Those linked sites and services are not under the control of PEP and it is not responsible for the availability of such external sites or services, and does not endorse and is not responsible or liable for any content advertising, products, services or other information on or available from such linked sites and services or any link contained in a linked site or service. PEP reserves the right to terminate any link at any time. You further acknowledge and agree that PEP shall not be responsible or liable, directly or indirectly, for any damage or loss caused or alleged to be caused by or in connection with use of or reliance on any such content, goods or services available on or through any such linked sites or resource. Most of such linked sites and services provide legal documents, including terms of use and Privacy and Cookie Policy, governing the use thereof. It is always advisable to read such documents carefully before using those sites and services, *inter alia*, in order to know what kind of information they are collecting.

12. Cookies & Local Storage

- 12.1. When you access or use the Site, PEP uses industry-standard technologies such as “cookies,” other tracking technologies, other local files and Flash (or similar technologies), which store certain information on the browser or hard drive of your computer and/or your mobile telephone device (“**Local Storage**”) and which will allow us to distinguish you from other users, enable automatic activation of certain features and improve your User experience and other capabilities.
- 12.2. Some cookies used by the Site are created per session, do not include any information about you, other than your session key and are removed as your session ends (usually after 24 hours). Other cookies remain saved to your device’s hard drive and/or your mobile telephone device and enable us to recognize your device in the event of a later visit to our website (persistent cookies). Persistent cookies allow us to make our Site more user-friendly, effective and safe.
- 12.3. It is easy to prohibit the Local Storage. Most devices and browsers will allow you to erase cookies from your device’s hard drive, block acceptance of cookies, or receive a warning before a cookie is stored. In order to erase or disable the Local Storage option in Flash you should use the settings option of Flash according to the specific instructions provided by the technology provider. However, if you block or erase cookies, or change the settings of Flash, your experience of the Site may be limited. Please note that unless you block the acceptance of cookies, the Site will utilize cookies upon your use of the Site (all unless it is required by applicable law to provide a separate consent to use such cookies, and in which case we will use such cookies only after we receive your separate consent to such use and subject to your right to withdraw such consent at any time).
- 12.4. Cookies and other Local Storage help PEP personalize the Site, and to:
 - track clicks, and online activity to estimate usage pattern and perform other analytics;
 - gather information about your approximate geo-location to provide localized content;
 - store information about your preferences and the device or browser you are using, and thereby customize and personalize the Site;
 - improve the Site; and
 - prevent fraud and/or abuse of our services.

13. Security

- 13.1. We take appropriate measures to maintain the security and integrity of our Site and prevent unauthorized access to it or use thereof through generally accepted industry standard technologies and internal procedures.
- 13.2. Your Personal Information is hosted on PEP's internal servers and PEP's service provider's servers, which provide advanced strict security standards (both physical and logical).

13.3. Some of the security measures that we employ include, without limitation: highly secure services design and implementation using state of the art encryption and architectures mechanisms, restriction of access to your Personal Information to individuals who need access to it in order to process it on PEP's behalf and implementation of a secured permission management and auditing system using specific and proprietary firewall and network access filtering as well as security group mechanisms.

Please note, however, that there are inherent risks in transmission of information over the Internet or other methods of electronic storage and we cannot guarantee that unauthorized access or use will never occur.

13.4. PEP will comply with applicable law in the event of any breach of the security, confidentiality, or integrity of your Personal Information and will inform you of such breach if required by applicable law.

13.5. TO THE EXTENT THAT PEP IMPLEMENTED THE REQUIRED SECURITY MEASURES UNDER APPLICABLE LAW, PEP SHALL NOT BE RESPONSIBLE OR LIABLE FOR UNAUTHORIZED ACCESS, HACKING, OR OTHER SECURITY INTRUSIONS OR FAILURE TO STORE OR THE THEFT, DELETION, CORRUPTION, DESTRUCTION, DAMAGE, OR LOSS OF ANY DATA OR INFORMATION INCLUDED IN THE PERSONAL INFORMATION.

14. **Data retention**

PEP will retain the Personal Information for as long as we are comfortable that it is accurate and can be relied upon. Personal Information which is no longer required for the purpose for which it was initially collected will be deleted unless we have a valid justification to retain it which is permitted under applicable law, such as to resolve disputes or comply with our legal obligations.

15. **Changes to the Privacy and Cookie Policy**

The Company reserves the right to change this Privacy and Cookie Policy at any time, so please revisit this page frequently to check for any changes. In case of any material change, we will make reasonable efforts to post a clear notice on the Site or we will send you an e-mail regarding such changes to the e-mail address that you may have provided us with. Such material changes will take effect seven (7) days after such notice was provided on our Site or sent to you via e-mail, whichever is the earlier. Otherwise, all other changes to this Privacy and Cookie Policy are effective as of the stated "Last Revised" and your continued use of the Site on or after the Last Revised date will constitute acceptance of, and agreement to be bound by, those changes. In the event that the Terms should be amended to comply with any legal requirements, the amendments may take effect immediately, or as required by the law and without any prior notice.

16. **Have any Questions?**

If you have any questions (or comments) concerning this Privacy and Cookie Policy, please send us an email to the following address: pepusa@pepfilters.com and we will make an effort to reply within a reasonable timeframe.

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