

PEP - Privacy and Cookie Policy

Last Revised: Nov 16, 2022

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](#)
- 16 [Your California Privacy Rights](#)
- 17 [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.

California Minors

California residents under eighteen (18) years of age may have additional rights regarding the collection and sale of their personal information. Please see "Your California Privacy Rights" below for more information

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. Your California Privacy Rights

The following additional privacy notices for California residents (the "California Notice") supplement the information contained in the other portions of this Privacy and Cookie Policy and apply solely to individuals who reside in the State of California ("California consumer" or "you"). PEP adopts this California Notice to comply with the California Consumer Privacy Act and its related regulations (the "CCPA") and other applicable California laws.

Overview of Consumer Rights Under the CCPA

Under the CCPA, California consumers have certain rights regarding their personal information, including:

- The right to know the categories of personal information that PEP has collected and the categories of sources from which we obtained such information.
- The right to know PEP's business purposes for sharing personal information.
- The right to know the categories of third parties with whom PEP shared personal information.

- The right to access the specific pieces of personal information that PEP has collected and the right to delete your personal information.
- The right to not be discriminated against if a California consumer exercise their rights under the CCPA.

The provisions below of this California Notice provide further details about these rights and how you may exercise them.

Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California consumer, household or device (collectively, "personal information"). Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated California consumer information.
- Information excluded from the CCPA’s scope, including:
- Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; and
- Personal information covered by certain other laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

We have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples
Identifiers	An individual’s name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number or other similar identifiers
Personal information categories described in Cal. Civ. Code § 1798.80(e)	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank

	account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information
Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
Internet or other similar network activity	Browsing history, search history, information on a California consumer's interaction with our website, application, or advertisement and any social media sites from which user information is linked, connected or obtained
Inferences drawn from other personal information	Examples include a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes

Sources of Personal Information

In addition to sources of personal information addressed elsewhere in this Privacy and Cookie Policy, we obtain the categories of personal information listed above from the following categories of sources:

- **Directly From You.** For example, from forms you complete or products and services you purchase or from communications with you such as when you contact PEP (whether in person, by mail, by phone, online, via electronic communication or by other means) including our customer support service.
- **Indirectly From You.** For example, from observing your actions on our Site or from products or services that you have purchased from PEP, if you have enabled such functionality, such as telemetry services.
- **From Others.**
- From third party service providers. For example, if you choose to make an electronic payment directly to PEP, or through a linked website or mobile application, or through an affiliate of ours, PEP may receive personal information about you from third parties such as payment services providers, for the purposes of that payment.

- From affiliates. We may collect personal information about you from our affiliates or others acting on their behalf.
- **From Public Sources.** For example, we may collect information from public records.

Uses of Personal Information

In addition to uses of personal information addressed elsewhere in this Privacy and Cookie Policy, we may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill the reason that you provided the information. For example, if you share your name and contact information to request a price quote, request to be contacted by an affiliate, or ask a question about our products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a product or service, we may use that information to process your payment and facilitate delivery. We may also save your information to facilitate new product or service orders or to process returns.
- To perform services such as customer service, order fulfillment, payment processing, financing and advertising, marketing or analytic services.
- To advance our commercial or economic interests, such as by helping you to buy, rent, lease, join, subscribe to, provide, or exchange products, information, or services, or enabling or effecting, directly or indirectly, a commercial transaction.
- To verify or maintain quality or safety standards or improve or upgrade a product or service provided or controlled by or for us.
- To provide, support, personalize and develop our Site, products and services such as to perform warranty related services or other post-sale activities such as product or service monitoring or repairs.
- To create, maintain, customize and secure your account with us.
- To process your requests, purchases, transactions and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your Site experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Site, third-party sites and via mail, email or text message (with your consent, where required by law).
- To help maintain the safety, security and integrity of our Site, products and services, databases and other assets and business.
- For testing, research and analysis purposes, including to develop and improve our Site, products and services.
- To respond to law enforcement requests and as required by applicable law, court order or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA or applicable law.
- To send you information relevant to your past purchases and interests, subject to compliance with applicable laws regarding direct marketing.
- To otherwise use as reasonably necessary and proportionate to achieve our operational or notified purpose for collecting personal information and as compatible with the context in which we collected the information.

- To perform services on behalf of a CCPA-covered business or its service provider, such as customer service, order fulfillment, payment processing, financing and advertising, marketing, or analytic services.
- To review and audit our business interactions with you.
- To detect or prevent security incidents or other illegal activity.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of a bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our Site users, including California consumers, is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated or incompatible purposes without providing you notice.

Sharing Personal Information

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, PEP has disclosed the following categories of personal information for a business purpose:

- Identifiers
- Personal information categories described in Cal. Civ. Code § 1798.80(e)
- Commercial information
- Internet or other similar network activity
- Inferences drawn from other personal information

The categories of third parties to which we may disclose personal information collected by us include the following:

- Service providers
- Affiliates
- Recipients of data from cookies

Sales of Personal Information

PEP does not sell personal information to third parties.

Exercising Your CCPA Rights and Choices

The sections below describe how you may exercise your rights under the CCPA.

Access to Specific Information and Data Portability Rights. You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past twelve (12) months. Once we receive and confirm your verifiable consumer request (see “Exercising Access, Data Portability and Deletion Rights” below), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.

- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we disclosed your personal information for a business purpose, a list disclosing:
- The personal information categories that each category of recipient obtained.

As allowed by the CCPA, we do not provide these access and data portability rights (i) for business-to-business personal information or (ii), if applicable, as to personal information collected from PEP's California-based employees, job applicants or contractors when provided or collected in such employee, job applicant or contractor capacities.

Deletion Request Rights. You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see "Exercising Access, Data Portability and Deletion Rights" below), we will delete (and direct our service providers to delete) your personal information from our (and service provider) records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products or services to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another California consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with California consumer expectations based on your relationship with us, such as future field campaigns or product safety issues.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

As allowed by the CCPA, we do not provide these deletion rights (i) for business-to-business personal information or (ii) if applicable, as to personal information collected from PEP's California-based employees, job applicants or contractors when provided or collected in such employee, job applicant or contractor capacities.

Exercising Access, Data Portability and Deletion Rights. To exercise the access, data portability and deletion rights described above, you should submit a verifiable consumer request to us by one of the following methods:

- Emailing us at privacy@pep.com
- By postal mail at: Kibbutz Amiad, D.N. Galil Elyon 1, 12335 Israel
- Accessing your online account that you maintain with us.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of a minor child for whom you are a parent or legal guardian.

You may only make a verifiable consumer request for access or data portability twice within a twelve (12) month period. The verifiable consumer request must provide sufficient information that allows us to reasonably verify that you are the person about whom we collected personal information or an authorized representative, which may include:

- Your name
- Your address
- Additional information depending upon the type of request and the sensitivity of the information involved with such request
- Describe your request with sufficient detail to enable us to properly understand, evaluate and respond to such request.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or your authority to make the request and confirm that the personal information involved with the request relates to you.

Making a verifiable consumer request does not require you to create an account with us. However, we will consider requests made through a password-protected online account that you maintain with us to be sufficiently verified when the request relates to personal information associated with that online account, provided such online account functionality is then made available by us on the Site.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time, we will inform you of the reason and extension period in writing.

If you have an online account with us, we may deliver our written response to that online account, provided that such online account functionality is then made available by us on the Site. If you do not have an online account with us, or such functionality is not available for your online account we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the twelve (12) month period immediately preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily usable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA or other applicable law, we will not as a result of you exercising any of your rights under the CCPA:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

Other California Privacy-Related Disclosures

Sharing Personal Information for Direct Marketing Purposes. Before sharing personal information of California consumers with third parties for direct marketing purposes we will obtain opt-in consent from the applicable California consumers or provide such California consumers with a cost-free method to opt out.

California Do-Not-Track Disclosure. At this time, the Site is not set up to honor web browser do-not-track settings. Do-not-track is a privacy preference that users can set in their web browsers. When a user activates the do-not-track settings in browsers that offer this setting, the browser sends a message to websites or applications requesting them not to track the user. For more information about do-not-track matters, please visit www.allaboutdnt.org.

Information on Marketing Disclosures. California Civil Code Section 1798.83 permits our users who are California residents to request and obtain from us once a year, free of charge, information about the personal information (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year. If applicable, this information would include a list of the categories of personal information that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us at privacy@pep.com or by postal to Kibbutz Amiad, D.N. Galil Elyon 1, 12335 Israel.

Content Removal Requests for Site Users Under 18 Years Old. If you are a Site user under 18 years of age and reside in California, you may request and obtain removal of, content or information that you have posted on the Site. You may send us any such requests by one of the following methods: (i) by email (writing "Privacy Policy/Removal Request" in the subject line) at privacy@amiad.com; or (ii) by writing to us at Kibbutz Amiad, D.N. Galil Elyon 1, 12335 Israel. We will review the request and respond promptly. You should be aware that a request to remove content or information posted by you on the Site does not ensure or require complete or comprehensive removal of such content or information from our databases.

Complaints

If you have any complaint about use of the Site, you may contact us by email at privacy@amiad.com, or by postal mail at Kibbutz Amiad, D.N. Galil Elyon 1, 12335 Israel. In accordance with California Civil Code Section 1789.3, California residents may also file complaints with the Complaint Assistance Unit, Division of Consumer Services, California Department of

Consumer Affairs by postal mail at 1625 North Market Road, Suite N112, Sacramento, CA 95834 or by telephone at 800-952-5210.

Changes to Our California Notice

We reserve the right to amend this California Notice at our discretion and at any time. When we make changes to this California Notice, we will post the updated California Notice on the Site and update the California Notice's effective date. Your continued use of our Site following the posting of changes constitutes your acceptance of such changes.

17. 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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