

NewBold Privacy Policy

Effective Date: April 30th, 2024

Last Updated: April 30th, 2024

NewBold Corporation (“NewBold,” “we,” “our,” or “us”) is committed to respecting and protecting the privacy of visitors to www.newboldtech.com, www.newboldcorp.com, and www.jrorders.com (collectively, our “Website”). This Privacy Policy (this “Policy”) describes how NewBold collects, uses, maintains, and discloses your personal information. This Policy applies to individuals who access our Website (each a “User” or “you” and, collectively, “Users”).

This Policy, together with our Terms of Use, govern your use of our Website. Please read this Policy carefully. By accessing our Website, you agree to the collection, use, maintenance, and disclosure of your personal information as described in this Policy.

We reserve the right to modify or amend this Policy at any time to reflect changes in our personal information practices or applicable law. Should it be necessary to do so, we will notify you and/or request your express consent of material changes to this Policy by posting such changes on the Website or by other acceptable means. Each version of the Policy is identified at the top of the Policy by its Last Updated date. Your continued use of the Website after changes have been posted constitutes your acceptance of the Policy as amended for personal information collected going forward, unless additional consent is required under applicable law. If you do not agree to the terms of our Policy, please do not use the Website or provide us your personal information.

If you wish to download and print a copy of this Policy, please click [here](#).

1. The Personal Information We Collect

NewBold may collect Users’ personal information: (1) directly from Users; and (2) automatically through the use of cookies and other tracking technologies.

A. Personal Information Users Provide To Us.

We collect most of the personal information about you directly from you, such as personal information that you provide via online forms to contact us, sign up to be a field technician, or request a consultation, or when you sign up for our mailing list, place an order, or create an account. This includes the following information:

- **Contact Form:** When you complete our contact form online, you may be asked for your personal information, such as your name, email address, and phone number, along with any additional personal information you choose to include in your message to us.
- **Field Technician Sign-Up Form:** When you complete our technician sign-up form online, you may be asked for your personal information, such as your name, email address, telephone number, postal address, signature, and personal information contained in your completed Form W-9 (including your Social Security number), along with any other information we need to help us determine whether you are qualified to join our team of field technicians, such as your capabilities, certifications, general liability certificate, service range, hours of availability, and the tools you have available.
- **Consultation Request Form:** When you complete our consultation request form online, you may be asked for your personal information, such as your name, email address, telephone number, employer name, and job title, along with additional information to help us promptly respond to you, such as your industry and the services of interest to you.

- **Mailing List:** When you join our mailing list, we collect and use your email address to send you emails about new products, special offers, and other information. If you wish to unsubscribe from our mailing list, you may click the “unsubscribe” link included at the bottom of our email communications or visit www.jrorders.com and unsubscribe via the “Mailing List” form located in the footer of the website. Please note, you may continue to receive certain transactional or account-related communications from us.
- **Orders:** When you place an order online, you may be asked for your name, email address, postal address, telephone number, company, and credit or debit card information.
- **Create an Account:** When you create an account with us, you may be asked for your name, email address, postal address, telephone number, tax identification number, and company.

B. Personal Information Automatically Collected.

We may utilize cookies and other tracking technologies to collect personal information automatically through your use of the Website as described below in the “Cookies and Other Tracking Technologies” section. This information may include your Internet Protocol (“IP”) address, browser type, browser language, internet service provider, resource requested, date and time of resource request, HTTP referring resource, operating system, and/or clickstream data.

2. **Cookies and Other Tracking Technologies**

A cookie is a small file containing a string of characters that may be sent to your web browser when you visit a website. Cookies may be used to enable Website functions, provide analytics, store your preferences, or to enable behavioral advertising.

We may use session cookies and persistent cookies. A session cookie expires automatically when you close your browser. A persistent cookie will remain until it expires or you delete your cookies. Expiration dates are set in the cookies themselves, some may expire after a few minutes while others may expire at a later time.

You can reset your browser to refuse cookies or to indicate when a cookie is being sent. By changing your preferences, you can accept all cookies, you can be notified when a cookie is set, or you can reject all cookies. You may also set your preferences in our Cookie Consent Manager located on every page at www.newboldtech.com. If you disable cookies, you may be required to re-enter your information more often and certain features of our Website, or our entire Website, may be unavailable.

We may also use third parties such as Google Analytics to help us gather and analyze information about the areas visited on the Website (such as the pages most read, time spent, search terms and other engagement data) in order to evaluate and improve the user experience and the Website. For more information about Google Analytics or to prevent the storage and processing of this personal information (including your IP address) by Google, you can download and install the browser plug-in available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>. You can also obtain additional information on Google Analytics’ data privacy and security at the following link: <https://policies.google.com/technologies/partner-sites>.

You may learn more about cookies and how to opt out of them by visiting the following third-party website: www.allaboutcookies.org.

3. Interest-Based Advertising

We may partner with third parties to display and manage our advertising on other websites. Our third-party partners, such as LinkedIn (<https://www.linkedin.com/legal/privacy-policy>), may use technologies such as cookies and pixel tags to gather information about your activities on our Website and other websites (such as web pages you visit and your interaction with our advertising and other communications) in order to make predictions about your preferences and provide you with tailored advertising across the Internet based upon your browsing activities and interests. This information may also be used to evaluate the effectiveness of our online advertising campaigns.

If you would like to opt out of having your personal information used for the purpose of serving you interest-based advertisements, you may do so by visit the following link: [Do Not Sell or Share My Personal Information](#). Please note this does not opt you out of being served advertisements. You will continue to receive generic advertisements from us, but the ads will not be targeted based on behavioral information about you and may therefore be less relevant to you and your interests.

For more information about interest-based advertising and to understand your options, including how you can opt out of receiving behavioral advertising from third-party advertising companies participating in the Digital Advertising Alliance, please visit the Digital Advertising Alliance at <http://www.aboutads.info/choices/>, the Network Advertising Initiative at <http://www.networkadvertising.org/choices/>, or the Digital Advertising Alliance of Canada at <http://youradchoices.ca/choices>.

To successfully opt out, you must have cookies enabled on your web browser (see your browser's instructions for information on cookies and how to enable them). Your opt-out only applies to the web browser and device you use, so you must opt out on each web browser on each device you use. Once you opt out, if you delete your browser's saved cookies, you will need to opt out again.

4. How We Use Personal Information

We use the personal information we collect to administer and manage our business operations. More specifically, we may use your personal information for one or more of the following purposes:

- Comply with our legal and regulatory obligations;
- For the performance of our contract with you or to take steps at your request before entering into a contract;
- Provide you with information, services, or products that you request;
- Provide you with functionality of the Website;
- For our legitimate interests or those of a third party;
- Minimize or prevent fraud, criminal activity, and unauthorized access and modification to systems;
- Ensure our business policies are adhered to;
- Analytics, data strategy, consultation, development, or improvement of products or services, marketing, advertising, and related services;
- Conduct research and perform analyses to measure, maintain, protect, develop, and improve our products and services;
- Administer and enhance marketing and advertising, including to show you relevant advertising and other promotional content;
- Communicate with you regarding your order, products, services, requests, marketing, security, privacy, and administrative issues;
- Maintain the safety, security, and integrity of the Website, services, products, assets, and business;
- Provide you with system information or information about new or upgraded products; and

- In any other way we may describe to you prior to the collection of your personal information for any other purpose with your consent or to comply with applicable law.

5. Disclosure of Personal Information

NewBold may disclose personal information collected from Users to trusted affiliates, business partners, contractors, and service providers who will: (1) use the information for the purposes outlined above; and (2) are contractually obligated to keep personal information confidential and use it only for the purposes for which we disclose it to them and with the same standards set out in this Policy. We may also transfer information collected from Users in connection with a sale of NewBold business. We will not otherwise disclose your personal information unless we have reason to believe that disclosing such information is necessary to identify, make contact with, or bring legal action against someone who may be causing harm or interfering with the rights or property of NewBold, our customers, or others, or where NewBold has a good faith belief that the law requires such disclosure.

6. Additional California Notices

A. The Personal Information We Collect

We may collect the following categories of personal information that identify, relate to, describe, are reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household:

<u>Category</u>	<u>Examples</u>	<u>Collected</u>
Identifiers.	A name, alias, postal address, unique personal identifier, online identifier, IP address, telephone number, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.	Name, email address, telephone number, postal address, Social Security number, tax identification number, and IP address.
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) ("Personal Records").	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. <i>Some personal information included in this category may overlap with other categories.</i>	Name, signature, Social Security number, telephone number, postal address, and debit or credit card number.
Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	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 consumer's interaction with a website, application, or advertisement.	Information on a consumer's interaction with the Website or advertisements, and Internet connection/browser type.

Professional or employment-related information.	Current or past job history or performance evaluations.	Employer name and job title.
Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and/or aptitudes.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and/or aptitudes.
Sensitive personal information.	Social Security number, driver's license number, state identification card, or passport number; account log-ins, financial accounts, debit or credit card numbers in combination with a security or access code, password, or other credentials; precise geo-location; racial or ethnic origin, religious or philosophical beliefs, or union membership; contents of mail, email or text messages; genetic or biometric data; mental or physical health diagnosis, sexual orientation; or personal information from a known child.	Account log-in, debit or credit card number in combination with a security or access code, and Social Security number.

B. How We Disclose and Share your Personal Information

We disclose personal information as shown below.

The first chart shows the categories of personal information we disclose to our service providers and contractors for business or commercial purposes. The second chart shows the categories of personal information we share for purposes of cross-contextual behavioral advertising.

Please note, we do not “sell” personal information as that term is defined under applicable state data privacy laws. Also, we do not have actual knowledge that we share the personal information of consumers under 16 years of age.

Disclosures for a Business or Commercial Purpose		
Category of Personal Information	Categories of Recipients	Purposes for Disclosure
Identifiers.	Service providers and affiliates to provide services on our behalf.	<p>To provide you with information, services, or products that you request.</p> <p>To provide you with functionality of the Website.</p> <p>To conduct research and perform analyses to measure, maintain, protect, develop, and improve our products and services.</p> <p>To communicate with you regarding your order, products, services, requests, marketing, security, privacy, and administrative issues.</p> <p>To administer and enhance marketing and advertising.</p> <p>To comply with our legal and regulatory obligations.</p>

		<p>To ensure our business policies are adhered to.</p> <p>To prevent unauthorized access and modifications to systems.</p>
Personal Records.	Service providers and affiliates to provide services on our behalf.	<p>To provide you with information, services, or products that you request.</p> <p>To provide you with functionality of the Website.</p> <p>To conduct research and perform analyses to measure, maintain, protect, develop, and improve our products and services.</p> <p>To communicate with you regarding your order, products, services, requests, marketing, security, privacy, and administrative issues.</p> <p>To administer and enhance marketing and advertising.</p> <p>To comply with our legal and regulatory obligations.</p> <p>To ensure our business policies are adhered to.</p> <p>To prevent unauthorized access and modifications to systems.</p>
Commercial information.	Service providers and affiliates to provide services on our behalf.	<p>To communicate with you regarding your order, products, services, requests, marketing, security, privacy, and administrative issues.</p> <p>To administer and enhance marketing and advertising.</p> <p>To conduct research and perform analyses to measure, maintain, protect, develop, and improve our products and services.</p>
Internet or similar network activity.	Service providers and affiliates to provide services on our behalf.	<p>To provide you with functionality of the Website.</p> <p>To administer and enhance marketing and advertising.</p> <p>To communicate with you regarding your order, products, services, requests, marketing, security, privacy, and administrative issues.</p> <p>To conduct research and perform analyses to measure, maintain, protect, develop, and improve our products and services.</p> <p>To comply with our legal and regulatory obligations.</p> <p>To prevent unauthorized access and modifications to systems.</p>
Professional or employment-related information.	Service providers and affiliates to provide services on our behalf.	<p>To comply with our legal and regulatory obligations.</p> <p>To ensure our business policies are adhered to.</p> <p>To prevent unauthorized access and modifications to systems.</p>
Inferences.	Service providers and affiliates to provide services on our behalf.	<p>To administer and enhance marketing and advertising.</p> <p>To communicate with you regarding your order, products, services, requests, marketing, security, privacy, and administrative issues.</p> <p>To conduct research and perform analyses to measure, maintain, protect, develop, and improve our products and services.</p> <p>To comply with our legal and regulatory obligations.</p>

Sensitive personal information.	Service providers and affiliates to provide services on our behalf.	To provide you with information, services, or products that you request. To comply with our legal and regulatory obligations. To ensure our business policies are adhered to.
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Sharing of Personal Information		
Category of Personal Information	Categories of Recipients	Purposes for Sharing
Identifiers.	Service providers and affiliates to provide services on our behalf.	To show you relevant advertising and other promotional content. Analytics, data strategy, consultation, development, or improvement of products or services, marketing, advertising, and related services.
Personal Records.	Service providers and affiliates to provide services on our behalf.	To show you relevant advertising and other promotional content. Analytics, data strategy, consultation, development, or improvement of products or services, marketing, advertising, and related services.
Commercial information.	Service providers and affiliates to provide services on our behalf.	To show you relevant advertising and other promotional content. Analytics, data strategy, consultation, development, or improvement of products or services, marketing, advertising, and related services.
Inferences.	Service providers and affiliates to provide services on our behalf.	To show you relevant advertising and other promotional content. Analytics, data strategy, consultation, development, or improvement of products or services, marketing, advertising, and related services.

7. Your State Privacy Rights

Depending upon your state of residency, you may have certain rights under applicable state data privacy laws. These rights may include:

Right	Description of Right
Right to Know and Request Disclosure (California residents only).	The right to request that we disclose certain information to you about our collection and use of your personal information, including: <ul style="list-style-type: none"> • The categories of personal information we have collected about you; • The categories of sources from which your personal information is collected; • Our business or commercial purpose for collecting or selling your personal information; • The categories of third parties to whom we disclose your personal information; and • The specific pieces of personal information

	<p>we have collected about you.</p> <p>In connection with any personal information we may sell, share, or otherwise disclose to a third party for a business purpose, you have the right to know:</p> <ul style="list-style-type: none"> • The categories of personal information about you that we sold or shared and the categories of third parties to whom the personal information was sold or shared; and • The categories of personal information we disclosed about you and the categories of third parties to whom the personal information was disclosed.
Right to Confirm.	The right to confirm whether or not we are processing your personal information.
Right to Access.	The right to access your personal information, subject to exceptions set out in the applicable state law.
Right to Delete.	The right to request that we delete any of your personal information that we collected from or about you and retained, subject to certain exceptions set out in the applicable state law.
Right to Correct.	The right to request that we correct any of your personal information that is inaccurate.
Right to Obtain a Copy.	The right to obtain a copy of or otherwise receive the personal information that you have provided to us in a portable, readily usable format that can be easily transferred to third parties.
Right to Opt Out.	<p>The right to opt out of the following uses of your personal information:</p> <ul style="list-style-type: none"> • Sale; • Sharing for targeted behavioral advertising; and • Profiling. <p>To exercise the right to opt out, you (or your authorized representative) may submit a request to us by visiting the following link: <u>Do Not Sell or Share My Personal Information.</u></p>
Right to Limit the Use of Sensitive Personal Information.	<p>The right to:</p> <ul style="list-style-type: none"> • Direct us to limit the use of sensitive personal information, as defined under applicable state law, that we may collect about you; and • To know if your sensitive personal information is used or disclosed to a third party, for additional, specified purposes.

	Please note that we use sensitive personal information only to the extent necessary comply with our legal and regulatory obligations and ensure our business policies are adhered to.
Right to Non-Discrimination.	The right to not be retaliated or discriminated against because you have exercised your data privacy rights.

If you wish to exercise any of the aforementioned rights granted to you under applicable law, please click [here](#) or contact us via email at privacy@newboldtech.com or via telephone at 864-675-6635. We may request specific information from you to help us confirm your identity and execute your request. Any additional personal information we collect from you to verify your identity in connection with your request will be used solely for the purposes of verification.

You may also have the right to appeal our decision if we deny your request. If you wish to appeal our decision regarding your request, please click [here](#) or contact us via email at privacy@newboldtech.com or via telephone at 864-675-6635. If you wish to file a complaint, you may be able to contact your Attorney General or relevant enforcement agency.

8. Your Canadian Privacy Rights

If you are a citizen of Canada, in addition to the rights described within this Policy, you are entitled to the following rights under the Personal Information Protection and Electronic Documents Act:

- Right to Withdraw Your Consent. Where you have provided your consent to the collection, use, and transfer of your personal information, you may have the legal right to withdraw your consent under certain circumstances, including the following: (1) targeted (behavioral) advertising; (2) promotional communications; (3) cookies and other tracking technology; and (4) retention of your personal information.
- Right to Access and Correct Your Personal Information. You have the right to access and request correction or completion of the personal information we hold about you.

If you wish to exercise these rights, please contact us via the contact information contained in the “Contact Us” section below or follow the process described in the “Your State Privacy Rights” section. If you are not satisfied with our response to your request to exercise your rights, you have the right to file a complaint with the Office of the Privacy Commissioner of Canada.

9. Do Not Track Signals and Global Privacy Controls

The Website does not respond to Do-Not-Track (“DNT”) signals. You may learn more about DNT signals by visiting the following third-party website: www.allaboutdnt.com. However, we treat Global Privacy Control signals as requests to opt out of sale and opt out of interest-based or targeted advertising under applicable state laws.

For more information on opting out of interest-based advertising, please see the Interest-Based Advertising section above.

10. Third-Party Content and Links

Our Website may contain links to third-party websites and digital platforms. NewBold is not responsible for the content or policies of such website or platforms. We recommend that you review the privacy policy posted on each third-party website and digital platform that you visit.

Our Website may also contain integrated social media tools or “plug-ins,” such as social networking tools offered by third parties. If you use these tools to share information or you otherwise interact with social media features on our Website, those social media companies may collect information, including personal information, about you and may use such information in accordance with their own policies. Your interactions with third-party social media companies and your use of their features are governed by the privacy policies of those companies. We recommend that you review the relevant privacy policies.

11. Retention of Personal Information

We will keep your personal information for as long as necessary to fulfill the purposes for which we collected it and in accordance with our internal document retention policy and any applicable laws. Different retention periods may apply for different types of personal information.

Under some circumstances, we may anonymize your personal information so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

12. Security of Personal Information

To protect your personal information in our custody or control from theft, unauthorized access, use, modification, and disclosure, and to maintain its accuracy and integrity, we have implemented reasonable technical, physical, and administrative security measures. However, we cannot guarantee that the information submitted to, maintained on, or transmitted from our systems will be completely secure. You acknowledge and agree that we are not responsible for the theft, destruction, or inadvertent disclosure of your personal information.

13. Children’s Personal Information

Our Website is marketed for, and directed to, adults. We do not knowingly collect personal information from children under 16 years old. If you believe that your child under the age of 16 has provided personal information to us, please contact us via the contact information contained in the “Contact Us” section below.

14. Not Intended for Use Outside of the U.S. or Canada

Our Website is intended for use within the United States and Canada, and is not intended to be used in any other jurisdiction. The Website may function in jurisdictions other than the United States and Canada. If you use the Website from outside of the United States, you explicitly accept that your personal information may be transferred to, stored, and processed in the United States where laws regarding processing of personal information may differ from the laws of other countries.

15. Users with Disabilities

To request this policy in an alternative format, please reach out to us via the contact information contained in the “Contact Us” section below.

16. Contact Us

If you have any questions regarding this Policy or our personal information practices, please contact us via email at privacy@newboldtech.com, via telephone at 864-675-6635, or via mail at the following postal address:

NewBold Corporation
Attn: Privacy
200 Ben Hamby Drive
Suite A
Greenville, SC 29615

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