

SPEX Europe Web Site Privacy Policy

Last updated June 13, 2018.

SPEX Europe (the “Company” or “SPEX”) respects your personal privacy and is committed to adhering to federal and state privacy laws and industry guidelines. This privacy policy (“Privacy Policy”) describes how we handle the personal information that you provide us on this site, www.spexeurope.com (the “Company Web Site” or the “Web Site”). This Privacy Policy applies only to the Company Web Site, not to any other company, affiliate or third party sites that may be accessible from here.

For personal information received from the European Union and European Economic Area, SPEX complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. More information can be found in the “EU-U.S. Privacy Shield” section below.

For more information regarding use of the Web Site, please visit our Terms and Conditions (the “**Terms and Conditions**”) [<https://www.spexeurope.com/Terms-and-Conditions-final.pdf>]. The Privacy Policy is incorporated into and made a part of our Terms and Conditions. By accessing or using our Web Site, you agree that you have read, understand, and are bound by the terms and conditions set forth herein. IF YOU DO NOT AGREE WITH ANY PART OF THIS PRIVACY POLICY OR OUR TERMS AND CONDITIONS, PLEASE DO NOT USE OR ACCESS OUR WEB SITE.

Our Privacy Policy may change from time to time. If we decide to materially change our Privacy Policy, we will post a notice of those changes on the Web Site.

After reading this Privacy Policy, you will know:

- 1) What information the Company collects from you
- 2) How the Company uses your information
- 3) What choices you have about how the Company treats your information
- 4) The Company’s participation in Privacy Shield and your choices related to the

Privacy Shield principles

- 5) How the Company protects your privacy
- 6) What the Company does about children visiting the Web Site
- 7) How you can contact the Company

Please be sure to read this Privacy Policy before using the Web Site or submitting information to us. Our Privacy Policy may change from time to time and your continued use of the Web Site is acceptance of such changes, so please check this area periodically for updates to this Privacy Policy.

1. INFORMATION THE COMPANY COLLECTS FROM YOU

Active Information Collection

Like many other Web Sites, we actively collect information from our visitors both by asking specific questions on the Web Site and by permitting you to communicate directly with us via e-mail. Some of the information that you submit during the registration process or while making a purchase may be personally identifiable (that is, information that can be uniquely identified with you, such as your name, company name, address, phone number, fax number, e-mail address, etc.). Also, if you place an order, you may be required to provide financial information.

When you visit the Web Site, we will not collect any personally identifiable information about you unless you choose to provide it to us voluntarily. If you choose to register with the Web Site, during the registration process you will be asked for both personal and demographic information, most of which is required in order to complete the registration. We will inform you which information is optional. Geographic information is needed to help us better serve you as regulations vary from jurisdiction to jurisdiction that may impact the services.

The Company does not have control over the privacy policies applied by any other party to which you may disclose information. Third party sites that are linked to from the Web Site are not under the control of the Company and we are not responsible for their content or privacy policies. If you would like information on any other party’s privacy policy, you should contact that party directly, and we encourage you to do so.

Passive Information Collection; Cookies

As you navigate through a Web Site, certain information can be passively collected (that is, gathered without you actively providing the information) using various technologies and means, such as navigational data collection. Like most Web Site operators, we track Internet Protocol (IP) addresses, use both session and persistent cookies, and assign Internet tags. Our system also automatically gathers information about the areas you visit on this site and collects operational information about the technology you use, such as your browser, type of computer, operating systems, (date and time of each visit) Internet service providers, and the domain name of the Web Site from which you linked to our site.

In addition, when you view the Web Site, we may store information on your computer. This information will be in the form of a cookie or similar file and will help us in many ways. For example, cookies allow us to tailor a Web Site or advertisement to better match your interests and preferences. Most Internet browsers enable you to erase cookies from your computer hard drive, block all cookies, or receive a warning before a cookie is stored. Please refer to your browser instructions or help screen to learn more about these functions. We may tie information collected automatically to your previously submitted personally identifiable information. However, it’s important to remember that our Web Site and services may not function properly if you set your browser to reject cookies.

We may use a tool called “Google Analytics” to collect information about use of the Web Site. Google Analytics collects information such as how often users visit our Web Site, what pages they visit when they do so, and what other sites they used prior to coming to our Web Site. We use the information we get from Google Analytics only to improve our Web Site. Google Analytics collects only the IP address assigned to you on the date you visit our Web Site, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Although Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit our Web Site, the cookie cannot be used by anyone but Google. Google’s ability to use and share information collected by Google Analytics about your visits to our Web Site is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. More information on Google Analytics can be found here: www.google.com/policies/privacy/partners/. If you would like to opt-out of having your data used by these cookies, please use the Google Analytics opt-out available here: <https://tools.google.com/dlpage/gaoptout/>.

We may also use other third-party service providers to track our visitors. Most browsers also allow you to turn on a feature commonly referred to as “Do Not Track” so that websites and service providers will not track your behavior over time and across websites. We do not combine the information collected through the use of any third-party service providers with personally identifiable information.

We passively collect information to understand what areas of the Web Site are most popular, which areas may require improvement and what technologies are being used by our visitors. This information helps us to update and improve the Web Site. We also use this information for security purposes to help us detect and block security breaches.

2. HOW THE COMPANY USES YOUR INFORMATION

The Company uses your personal information to enhance the operation of the Web Site and allow you to use all of its features.

- To fulfil transactions
- To deliver confirmation and other operational/transactional functions
- To market products and services
- To manage your business
- To comply with laws
- To provide important administrative information about this Web Site and our services

Your contact information (billing, shipping and e-mail addresses) and financial information (credit card number) will be used for the purposes for which you supplied it to us to send you related notices or promotional materials and to respond to your comments or requests for information. If you direct comments to us or you request information from us, we may ask you to verify where you are doing business so that we can be assured that the response or information we provide is appropriate for that geographic location, as different regions have different regulations. We may also enhance or merge personally identifiable information with data obtained from third parties for the same purposes.

We use your personal information for legitimate business purposes, including the following:

Fulfillment of Requests. We may use personal information about you to deliver services to you, provide you with information about services you or your company may have ordered and/or provide you with customer service or technical support. We will engage in these activities to manage our contractual relationship with you or your company and/or to comply with a legal obligation.

Other Communications. From time to time, we may use personal information about you to inform you of products, programs, and services that we believe may be of interest to you. If your employer is our customer, we may also inform you of such products, programs, and services using personal information about you that your employer provided to us. Please review your employer's policies in this regard.

Other Business Purposes. We may also use personal information about you for other business purposes, such as data analysis (for example, to improve the efficiency of services), editorial and feedback purposes, providing customer service or technical support, customizing and improving the content and layout of the Web Site, completing business transactions, development of marketing plans and materials, statistical analysis of user behavior (for example, to understand what parts of the Web Site are of most interest to users), product development, market research, administering individual accounts, and meeting regulatory requirements.

Administrative Communications. We reserve the right to use personal information to send you important information regarding the Web Site, services, your account status, changes to the Terms and Conditions or this Privacy Policy, or any other policies, agreements or transactions relevant to your use of the Web Site and/or services. Because this information may be important to your use of the Web Site, and/or services, you may not opt-out of receiving such communications. These are not advertisements, but rather information about (e.g.) changes to the Terms and Conditions or Privacy Policy, changes to contact information, or new choices for you to consider. We will engage in this activity to manage our contractual relationship with you and/or your company and/or to comply with a legal obligation.

Employment. We may use your personal information to consider you for employment when you apply for a position with us or submit a résumé to us.

Other than Administrative Communications or those emails that are necessary to provide you with the services you have requested or purchased, all of our email communications include the ability for you to opt-out from receiving future emails.

Except with regard to Onward Transfers, as discussed below (<https://www.privacyshield.gov/article?id=3-ACCOUNTABILITY-FOR-ONWARD-TRANSFER>) or to third parties that help us to operate our Web Site and the delivery of our services to you, the Company will not give or sell your personally identifiable information to any outside organization for the organization's own use without your consent. The Company may disclose your personal information to the vendors that assist us in processing information or delivering the items that our customers order. These vendors are restricted from using the information for any purpose other than helping us to provide products and services.

The Company does not otherwise distribute your personally identifiable information to third parties. However, to the fullest extent allowed by law, the Company, will have no liability for disclosure of information obtained due to errors in transmission or the unauthorized intervention of third parties outside of our reasonable control.

The Company may provide aggregate statistics about our customers, sales, online traffic patterns, and related information to reputable third parties, but these statistics will not include any personally identifying information, and the data is first anonymized prior to sharing this information.

The Company will also disclose any information that it is required to disclose by law or by an appropriate government authority.

Some of our advertisers may display ads on the Web Site that solicit or contain technology to collect information about our users. This information is collected and used by our advertisers, and is outside of our control. If you have any questions about a banner advertisement, you should contact the responsible advertiser directly.

3. EU-U.S. Privacy Shield

SPEX complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. SPEX has certified to the Department of Commerce that it adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability, and the 16 Supplemental Principles (to the extent they apply to our use and collection of personal data) (collectively, "**Privacy Shield Principles**"), and such adherence is subject to investigation and enforcement by the U.S. Federal Trade Commission.

SPEX's participation in the Privacy Shield applies to all personal information transferred from the European Union and European Economic Area to SPEX in the United States, including (but not limited to), personal information collected or otherwise processed by SPEX on behalf of its Europe-based customers and other users of the Web Site and services. SPEX will comply with the Privacy Shield Principles in respect of such personal information.

If there is any conflict between the terms in this policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. SPEX's adherence to the Privacy Shield Principles may be limited to the extent necessary to meet national security, public interest, or law enforcement requirements.

SPEX's accountability for personal information that it receives under the Privacy Shield and subsequently transfers to a third party is described in the Privacy Shield Principles. In particular, SPEX remains responsible and liable under the Privacy Shield Principles if third-party agents that it engages to process personal information on its behalf do so in a manner inconsistent with the Privacy Shield Principles, unless SPEX proves that it is not responsible for the event giving rise to the damage (if any).

Individuals whose personal information is transferred to SPEX under the Privacy Shield have the right to access their personal information maintained by SPEX, and to correct, amend or delete such information where it is inaccurate or processed unlawfully, as described in the Privacy Shield Principles.

To exercise any of these rights, please email SPEX at privacy@spex.com.

In addition, SPEX provides individuals with certain choices regarding how we use and disclose personal information.

If SPEX uses your personal information for a materially different purpose than that for which it was originally collected or discloses your personal information to a third party (other than third party providers acting on our behalf), we will first provide you with a clear, conspicuous and readily available mechanism to opt-out of any such use or disclosure (e.g., by sending you an email seeking your consent). In addition, all of our email communications include the ability to opt-out from receiving future emails, except those emails that are necessary to provide you with the services you or your company have requested or purchased.

If you have any questions about your choices regarding how we use and disclose your personal information, or how to exercise these choices, please email SPEX at privacy@spex.com.

We encourage you to contact us should you have a Privacy Shield-related (or general privacy-related) complaint or inquiry by emailing SPEX at privacy@spex.com.

For any complaints that cannot be resolved with SPEX directly, SPEX has chosen to cooperate with JAMS an alternative dispute resolution provider, to resolve such complaints at no cost to you. Please visit <https://www.jamsadr.com/eu-us-privacy-shield> for more information or to file a complaint.

As further explained in the Privacy Shield Principles, a binding arbitration option will also be made available to you in order to address residual complaints not resolved by any other means.

To learn more about the Privacy Shield program, please visit www.privacyshield.gov. To view our certification, please visit www.privacyshield.gov/list.

Choices You Have Regarding Your Personal Data

We give you choices regarding our use and disclosure of your personal information for marketing purposes.

If you no longer want to receive marketing-related emails from us on a going-forward basis, you may stop receiving these marketing-related emails by sending an e-mail to SPEXEurope@spex.com.

If you would prefer that we do not share your personal information on a going-forward basis with our affiliates or with unaffiliated third parties for their marketing purposes, you may cease this sharing by sending an e-mail to SPEXEurope@spex.com.

We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you exercise the second option as described above, we will not be able to remove your personal information from the databases of our affiliates or unaffiliated third parties with which we have already shared your personal information (i.e., to which we have already provided your personal information as of the date that we implement your request). Further, please note that requesting us not to share your personal information with affiliates or unaffiliated third parties may result in you no longer receiving any marketing emails from SPEX. Please also note that if you choose not to receive marketing-related messages from us, we may still send you important administrative messages, and you cannot elect to stop receiving such administrative messages, unless you choose to stop receiving services from us.

You may also indicate your choices regarding marketing-related emails by contacting us via regular mail using the "Contact Information for SPEX" below, or if you have a Web Site profile/account, by changing your preferences on your Web Site profile/account at any time.

How You Can Access, Change or Suppress Your Personal Data

If you would like to request to review, correct, update, suppress, delete or otherwise limit our use of your personal information that has been previously provided to us, or if you would like to request to receive an electronic copy of your personal information for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law), you may make a request by contacting us using the information provided in the "Contact Information for SPEX" below. You may also view and modify the personal information you have provided to us by logging into the Web Site and clicking on "My Account". If you have forgotten your password, click on the "Forgot Your Password" link to reach a page on which you can enter your e-mail address to have your stored password sent to your registered e-mail address. You may also send us an e-mail message at SPEXEurope@spex.com to request access to, correct or delete any personal information that you have provided to us. We will respond to your request consistent with applicable law. For your protection, we may only implement requests with respect to the personal information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable and consistent with applicable law. Please note that we may need to retain certain information for record keeping purposes and/or to complete any transactions that you began prior to requesting the change or deletion. There may also be residual information that will remain within our databases and other records, which will not be removed.

CHOICES YOU HAVE ABOUT HOW THE COMPANY USES YOUR INFORMATION

We have created mechanisms to provide you with the following choices with respect to your information:

As discussed above, if you do not wish us to collect cookies, you may set your browser to refuse cookies, or to alert you when cookies are being sent. If you do so, please note that some parts of this site may then be inaccessible or not function properly.

If you do not wish to share your personal information with unaffiliated or non-agent third parties, please tell us at SPEXEurope@spex.com. You also may opt out of having your e-mail address used for promotional purposes by the Company. This opt out does not apply to information provided to the Company as a result of a product purchase, warranty registration, product service experience, or other transactions. If you no longer wish to receive information or promotional materials from us by e-mail you may opt out of receiving these communications. We offer two methods for such opt-out

choices. If we have sent you a promotional e-mail, follow the unsubscribe instructions included at the top or bottom of the message. You also may send us an e-mail stating your request addressed to **SPEXEurope@spex.com**.

4. HOW THE COMPANY PROTECTS YOUR INFORMATION

We work hard to protect your personal information. We use both technical and procedural methods to maintain the integrity and security of our databases including, but not limited to, the use of firewalls, SSL encryption for data transfer, restricted access to data, and employee training.

Your personal information is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential. In addition, all financial information you supply is encrypted via Secure Socket Layer (SSL) technology.

All transactions are processed through a gateway provider and are not stored or processed on our servers.

The safety and security of your information also depends on you. If you have access to password-protected features, never share your password with anyone else, notify us promptly if you believe your password security has been breached, and remember to log off of this site before you leave your computer. We further urge you to be careful about giving out personal information in public areas of this site like chat rooms or bulletin boards. When you provide information in these forums, you do so at your own risk. The information you share may be viewed by any user of this site.

No method of transmission over the internet, or method of electronic storage, is 100% secure. We cannot guarantee absolute security.

Should a data breach occur:

We will notify you via email within 72 hours after we learn of a breach impacting your personal information.

This site contains links to other Web Sites operated by third parties that may be of interest to you. We cannot control these third party sites which may collect personal information from you. When you follow a link and leave this site, you do so at your own risk.

California Online Privacy Protection Act

CalOPPA is the first state law in the nation to require commercial websites and online services to post a privacy policy. The law's reach stretches well beyond California to require a person or company in the United States (and conceivably the world) that operates websites collecting personally identifiable information from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals with whom it is being shared, and to comply with this policy. - See more at: <http://consumercal.org/california-online-privacy-protection-act-caloppa/#sthash.0FdRbT51.dpuf>

According to CalOPPA we agree to the following:

Users can visit our site anonymously

Once this privacy policy is created, we will add a link to it on our home page, or as a minimum on the first significant page after entering our website. Our Privacy Policy link includes the word 'Privacy' and can easily be found on the page specified above.

Users will be notified of any privacy policy changes:

- On our Privacy Policy Page

Users are able to change their personal information:

- By emailing us

How does our site handle do not track signals?

We honor do not track signals and do not track, plant cookies, or use advertising when a Do Not Track (DNT) browser mechanism is in place.

Does our site allow third party behavioral tracking?

It's also important to note that we do not allow third party behavioral tracking

5. WHAT THE COMPANY DOES ABOUT CHILDREN VISITING THE WEB SITE

The Web Site is not intended for children and we will not knowingly collect information from children. We encourage parents to talk to their children about their use of the Internet and the information they disclose online. If a child has provided us with personally identifiable information, a parent or guardian of that child may contact us via e-mail at **SPEXEurope@spex.com** so that we can delete this information from our records. We will use reasonable efforts to delete the child's information from our databases.

Third party links.

Our Web Site and Services may contain links to other sites such as social networks and links to our business partners. Please be aware that we do not endorse and are not responsible for the privacy practices of such other sites and the Privacy Policy presented here does not apply to such sites. If you have any questions about these other companies' data practices, you should review their privacy policies.

6. HOW YOU CAN CONTACT THE COMPANY

If you have submitted personally identifiable information through the Web Site or an interactive advertisement, or if someone else has submitted your personally identifiable information through the Web Site or an interactive advertisement, and you would like to have that information deleted from our marketing databases, please contact us via e-mail at **SPEXEurope@spex.com**. You also may contact us to request the personally identifiable information that the Company has collected about you through the Web Site or interactive advertisements.

If you have any questions, comments or concerns about this Privacy Policy or the information practices of this site, please contact SPEX Europe at:

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