

## **Privacy and Cookie Policy**

This is the privacy policy of **Hargrove, LLC** and its affiliated and subsidiary companies.

### **How We Protect Your Privacy**

The privacy and security of your personal information is very important to us. We do not share your personal information in ways not disclosed in our privacy policy or without your informed permission. We value your trust highly and strive to protect the confidentiality and appropriate use of any personal information you provide to us. Details are described below.

If there are questions or concerns regarding this statement, please contact:

#### **Hargrove, LLC**

Attn: Privacy Office

1 Hargrove Dr.

Lanham, MD 20706

Phone: 1.301-306-9000

Email: [privacyoffice@hargroveinc.com](mailto:privacyoffice@hargroveinc.com)

### **Privacy Policy Structure**

Below is a list of the topics covered within this Privacy Policy by heading:

- Purpose of this Privacy Policy
- Personally Identifiable Information Hargrove Collects and Uses
- Personally Identifiable Information Disclosure
- Web site and Internet Privacy
- Links to Other Websites
- Active Information Collection
- Passive Information Collection
- Other Uses and Disclosures of Information
- Data Security
- Processing of PII for Marketing Purposes
- Ask Us / Enforcement of this Privacy Policy
- Changes to this Privacy Policy
- Acceptance of this Privacy Policy

### **Purpose of this Privacy Policy**

Hargrove recognizes the importance of protecting your information, including your personally identifiable information (such as your name, work phone number, work email address and other contact information, collectively, "PII") that you provide to Hargrove, that Hargrove collects about you, that Hargrove receives from other sources and that Hargrove creates about you. This Privacy Policy sets out our policies regarding the

collection, use and disclosure of your PII, both through our online and offline operations. This Privacy Policy also explains how you can exercise your rights in relation to the PII we hold about you and how you can let us know if you do not wish Hargrove to use your PII for marketing or promotional purposes.

The purpose of this Privacy Policy is to tell you how Hargrove strives to better serve you by keeping you informed of promotions, products and services, while, at the same time, safeguarding your PII.

This Privacy Policy is incorporated into, and made part of, Hargrove's websites (the "Hargrove Sites").

### **Personally Identifiable Information Hargrove Collects**

#### **Information you give us:**

When you order equipment or services, we need to collect certain PII from you in order to provide our services to you and to improve our services. The service that you choose will determine what information we collect from you. This information may include, but is not limited to:

- Name
- Work/Business Email address
- Work/Business address
- Phone numbers at which we can contact you
- Method of payments (credit card and expiration date)

You may choose not to provide some of your PII to us, but this may prevent us from providing our services to you, or limit our ability to provide you with the level of service that you would otherwise expect from us.

Hargrove's websites and services are not directed to or intended for persons under the age of 18. Hargrove does not knowingly collect PII from persons under the age of 18. If you are under the age of 18, please do not provide such information to us.

#### **Active Information Collection**

At various points on the Hargrove Sites, you might choose to actively provide certain kinds of information, including PII. The Hargrove Sites typically will indicate which information is required and which information is optional at the information collection point in question. In any case, by submitting information via an active information collection point at any of the Hargrove Sites, you consent to the collection, use, and dissemination of such information in accordance with this Privacy Policy.

Active information collection points at the Hargrove Sites may include:

#### **Online Transactions**

Hargrove maintains rigorous standards to protect your PII. We use encryption technology to ensure the secure transmission of any PII you provide for use during an onsite transaction. All transactions at our Hargrove Site are conducted using 128-bit Secure Sockets Layer (SSL) encryption. SSL is the standard security technology for establishing an encrypted link between a web server and a web browser. This link ensures that all data passed between the web server and browsers remain private and integral. SSL is an industry standard and is used by millions of websites in the protection of online transactions with customers. You can easily determine when you are sending data securely by looking at the web address (URL) in your browser window: the first few letters will change, from "http" to "https" when you are transmitting information protected by SSL encryption. The "s" in "https" stands for "secure."

#### **Email Reply Mechanisms**

The Hargrove Sites may provide you with one or more email mechanisms through which you may submit questions or comments. Information you provide via such email mechanisms is typically optional. We may use the information you provide in your email to respond to your inquiry, and we reserve the right to retain whatever information you submit in your email, including any PII via the email mechanism.

#### **Question, Comment, and Feedback Forms**

The Hargrove Sites may post a form for you to use in submitting questions, comments, and other feedback about us, our affiliates, the Hargrove Sites, or our affiliates' products and services, and other topics. We use such feedback information to improve the Hargrove Sites, and affiliates' products and services as well as for marketing and research purposes. Most information you provide in such forms is optional, but you will need to provide at least some PII, so that we may respond to your inquiry.

#### Information Request Forms

The Hargrove Sites may include a form that you can use to request information about us, our affiliates, or our affiliates' products and services, or to request catalogs or brochures or price quotes. In addition to asking you to identify the specific information or materials in which you are interested, these forms may request, among other things, your PII, so that we may send you the information or materials you request. These forms may also request certain information about you to help us better understand your interests and needs.

#### Surveys and Evaluations

The Hargrove Sites may ask you to complete optional surveys and evaluations about us, our affiliates, the Hargrove Sites, or our affiliates' products and services, and other topics. These surveys and evaluations might request PII so that we can follow up with you. Typically, we use such surveys and evaluations to better understand our customers and their preferences.

#### Registration Forms

As access to portions of the Hargrove Site is restricted to authorized users, you may be required to complete a registration form. This form may ask you for a variety of information that will help us to identify you and contact you, including some PII and your relationship to us. Registration information will be associated with your username and password, without which you will not be able to access the restricted portions of the Hargrove Sites.

#### **Information we collect about you:**

When you order equipment or services, we will also record information that details your order (e.g. where you ordered the equipment or services, where and when you used the equipment or services, payment arrangement and other information related to the equipment or services personnel).

How we collect information will depend on how you use our services. We may collect this information directly from you by postal mail, phone, fax, email, at our offices, upon completion of an application or enrolment form, or through your use of our Hargrove Sites or the Internet. To the extent you use our Hargrove Sites, we may also collect information about your use of our Hargrove Sites, transactional and account information, email and other information related to communications to our Hargrove Sites.

#### Passive Information Collection

The Hargrove Sites uses various technologies to passively collect information from you while you are visiting (that is, you do not actively provide this information). Such technologies allow the Hargrove Sites to collect a range of PII, including your Internet Protocol (IP) address (a unique identifier automatically assigned to your computer when logging onto the Internet), the type of web browser and operating system you use, the date and time you visit the Hargrove Sites, the specific pages you visit on the Hargrove Sites, and the address of the website you visited before coming to the Hargrove Sites. We typically use such passively collected PII for a variety of purposes, such as to administer the Hargrove Sites, customize the Hargrove Sites to your preferences, and compile aggregated statistics for marketing and research purposes.

Two types of passive information collection technologies deserve a special mention:

#### *Cookies*

"Cookies" are small text files that store information about your interactions with a particular website, either temporarily (known as a "temporary" or "session" cookie, and deleted once you close your browser window) or more permanently on the hard drive of your computer (known as a "permanent" or "persistent cookie"). Cookies can make it easier to use a website by allowing servers to access certain information quickly:

Session cookies can be used to help a user's browser navigate a website more smoothly and may show up if the user comes from a website with which the subsequent website has some relationship (e.g., a website of an affiliated company) and can give helpful information.

Persistent cookies can be used to customize a website for a user, such as by storing passwords, preferences, and registration and account information so that users do not have to re-enter them each time they visit a website.

The Hargrove Site uses both session/temporary cookies and persistent/permanent cookies to store information that allows us to offer you better customer service and to navigate through the Hargrove Site with ease. To make the Hargrove Site easier to use, we combine information collected via cookies with PII. You agree that we have the right to use both session/temporary cookies and persistent/permanent in the ways we have described in this privacy policy.

Please note that if you configure your browser to reject cookies, you might not be able to access important functions or areas of the Hargrove Site or enjoy certain conveniences at the Hargrove Site.

**Information we receive from other sources:**

We may also collect information about you indirectly through a meeting planner or other event organizer. Additionally, our affiliates and third parties may provide us with information about you.

**Personally Identifiable Information Use and Disclosure**

***Usage***

The law requires us to only use your PII where specific justifications apply. We set out the lawful justifications we rely upon to use your PII below. It is necessary for Hargrove, affiliated parties and non-affiliated parties to process your PII:

- To provide the services and offerings that you request, and to communicate with you regarding such services and offerings; and
- To do all things necessary to administer those services.

We process PII you provide to us for the purposes of the following legitimate interests of Hargrove, affiliated and non-affiliated third parties:

- To research, develop, manage, protect and improve our Hargrove Sites and services;
- To maintain, develop and improve our service-oriented software and other business systems;
- To analyze data, or to have a third party do so on our behalf; and
- To conduct direct marketing activities.

We also use your PII information or some discrete part such as your email address for other Hargrove marketing and communication purposes.

If you use our Hargrove Sites, information may also be used to evaluate what portions of our Hargrove Sites are visited more often than others, determine where visitors came from, where they go, and how long they stay on a particular page, or on the Hargrove Sites in general.

We may match information collected from you through different means or at different times, including, for example, information collected online and offline, and use such information along with information obtained from other sources, including third parties with whom we have a confidentiality agreement in place. To do this, it is often necessary to share this information with carefully selected vendors and business partners we work with, such as companies that provide services to you or the event or manage accounts, and companies that perform marketing services and other business operations for us. For more information see Disclosure below.

## ***Disclosure***

You agree that we have the right to disclose to and share your PII with affiliated and non-affiliated organizations including, for example:

- To your company or organization if you use our services under a corporate or other commercial account;
- To entities that provide services on our behalf;
- To your credit card issuer;
- To debt collection agencies, if you fail to pay monies owed to us;
- To government, regulatory and law enforcement agencies where the disclosure is required or authorized by law, and otherwise as we believe is necessary or appropriate to satisfy any law, regulation or other governmental request, to operate our Hargrove Sites properly, or to protect or defend our rights or the rights or well-being of our employees, users or others or if you are involved (or are suspected by governmental authorities or our security functions to be involved) in any illegal activity, even without a subpoena, warrant or court order.
- To other non-affiliated third parties, such as entities that provide services for or through our Hargrove Sites or for our business (e.g., content providers, services providers, credit card processors, fulfillment services providers, email list hosting companies and distribution companies) that use such information on our behalf in a way which is consistent with this Privacy Policy. These types of third parties are not permitted to use your information for any secondary purposes.

## **Other Uses and Disclosures of Information**

From time to time, our service providers may have access to information you submit via the Hargrove Sites to provide operational or other support services for the Hargrove Sites (e.g., web hosting or database services). We have put in place agreements with such service providers to protect against unauthorized uses or disclosures of such information.

Except as otherwise provided in the "Active Information Collection" section above, we reserve the right to sell, lease, provide access, or otherwise transfer PII you submit via the Hargrove Sites to our business partners (including email delivery services and content providers), affiliates, and dealers for the purposes described in this Privacy Policy.

Notwithstanding anything to the contrary in this Privacy Policy or elsewhere on the Hargrove Sites, we reserve the right to share or transfer any information, including PII, you submit via the Hargrove Sites to another person or company in connection with the sale, assignment or other transfer of the business of the Hargrove Sites and/or Hargrove (in whole or in part or any of their assets), including bankruptcy; to respond to law enforcement requests; or where required by applicable law, statute, regulation, ordinance, subpoena, or court order. By submitting PII via the Hargrove Sites, you consent to such disclosures in accordance with this Privacy Policy.

All transfers of PII, international or otherwise, shall be in compliance with this Privacy Policy and all applicable laws.

## **Processing of PII for Marketing Purposes**

You have the right to ask Hargrove not to process your PII for marketing purposes, including not providing your PII to third parties for such third parties' direct marketing purposes. You can exercise your right to prevent such processing at any time by contacting us at [privacyoffice@Hargrove.com](mailto:privacyoffice@Hargrove.com) or by writing to us on the address below:

Hargrove  
Attn: Privacy Office  
1 Hargrove Dr  
Lanham, MD 20706

Your option not to receive promotional and marketing material: (a) shall not preclude us from corresponding with you, by email or otherwise, regarding your relationship with us (e.g., your account status and activity or our responses to questions or inquiries you pose to us, confirmations for existing reservations); (b) shall not

preclude us, including our employees, contractors, agents and other representatives, from accessing and viewing your PII for our internal business purposes; and (c) shall not preclude us from disclosing your PII as described in this Privacy Policy for purposes other than sending you promotional and marketing materials.

### **Storage of PII**

For our customers who are in the European Economic Area (“EEA”), the PII that we collect from you will be transferred to, and stored at, a destination outside the EEA. It will also be processed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your PII, you agree to this transfer, storing or processing. Hargrove will take all steps reasonably necessary to help safeguard your PII and see that it is treated in accordance with this privacy policy. All PII you provide to us is stored on our servers which employ security measures consistent with industry standards.

### **Data Security**

Although we take steps to protect personally identifiable information you provide via the Hargrove Sites from loss, misuse, or unauthorized alteration, no system is 100 percent secure or error-free. Therefore, we do not, and cannot, guarantee the security or accuracy of the information we collect via the Hargrove Site, and you acknowledge that you are assuming the risk in transmitting any information to us.

It is your responsibility to safeguard any usernames and passwords you use to access portions of the Hargrove Site and to notify us if you ever suspect that these usernames or passwords have been compromised. You acknowledge that you are solely responsible for any unauthorized use of this Site conducted via your username or password. We ask you not to share a password with anyone.

### **Retention Periods**

To ensure fair processing, your PII will not be retained by Hargrove for longer than necessary in relation to the purposes for which it was originally collected, or for which it was further processed such as for tax, accounting, legal, or reporting purposes as may be required by law.

### **Your Rights**

You can exercise your right to access the PII we hold about you, as well as other rights in relation to the PII we hold about you, by contacting the Privacy Office. If you make a request relating to any of your rights, Hargrove will consider each such request in accordance with all applicable data protection laws and regulations.

We will need to verify your identity before we can fully respond to a request and in some jurisdictions we are permitted to charge a nominal fee to cover the administrative costs of providing you with details of the PII we hold about you. If you are a customer in the EEA, no administration fee will be charged for considering and/or complying with a request unless the request is deemed to be excessive in nature.

If you wish to contact us to: (1) inquire about our privacy practices; (2) provide feedback and comments regarding our privacy practices; or (3) access or correct your PII we have, contact us as detailed above.

If you are a customer in the EEA, you may be able to exercise the rights below. If you wish to exercise the rights below in relation to your PII, please write to Hargrove for the attention of the Privacy Office via email to [privacyoffice@Hargrove.com](mailto:privacyoffice@Hargrove.com):

- Information access
- Objection to processing of your PII
- Objection to automated decision-making and profiling
- Restriction of processing of PII
- [PII portability]
- PII rectification
- PII erasure

If you are a customer in the EEA, you also have the right to lodge a complaint with a supervisory authority. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

### **Links to Other Websites**

Our Hargrove Sites may contain links or references to other websites outside of our control, and the privacy policies of these websites are separate from our Hargrove Sites and may differ from our own. Please be aware that we have no control over such websites and our privacy policy does not apply to such websites. We advise that you to check the privacy policies of such websites before disclosing any PII via such websites.

### **Ask Us / Enforcement of this Privacy Policy**

If at any time you have questions, comments, or concerns about this Privacy Policy, or the information practices of this Site, please contact us in one of the following ways:

**Mail:** Hargrove

Attn: Privacy Office

1 Hargrove Dr

Lanham, MD 20706

**Phone:** 1-301-306-9000

**Email:** [privacyoffice@Hargrove.com](mailto:privacyoffice@Hargrove.com)

### **Changes to this Privacy Policy**

Hargrove reserves the right, at our discretion, to change, modify, add, or remove portions from this Privacy Policy at any time so visitors are encouraged to review this Privacy Policy at the inception of each session. If Hargrove make a material change to our practices with regard to PII that would negatively affect the privacy and/or security of your PII, Hargrove will use reasonable efforts to notify you in advance and give you a reasonable period of time to object to any such changes.

### **Acceptance of this Privacy Policy**

By using our Hargrove Sites, or otherwise providing your PII to us, you signify your acceptance of our Privacy Policy. If you do not agree to this policy, please do not use the Hargrove Sites or provide any PII to us.

**This Privacy Policy was last revised April 2018**