

PRIVACY POLICY

Effective Date: June 17, 2022*

This Privacy Policy describes how Flushmate LLC treats information about you that Flushmate collects and receives through this website, www.flushmate.com, and Flushmate's other websites and online locations, including web applications, mobile applications and social media (collectively, the "**Sites**") and through other interfaces with and aspects of Flushmate's business, including offline. This Privacy Policy together with the [Terms of Use](#) governs your use of the Sites and Flushmate's collection, use and disclosure of your information both through the Sites and offline.

Please note that while this Privacy Policy also describes how Flushmate collects and treats information about you in connection with the subscription services for Flushmate Internet of Things (**IOT**) restroom products, the Flushmate Terms of Use (referenced above) are not applicable to and do not govern the use of these subscription services, the associated IOT product software or the use of the Flushmate Application Programming Interface (**API**) for such products and services, as these products and services are governed by their own respective and independent terms of service, use and purchase, as applicable.

1. Acceptance of Privacy Policy

Each time you access, use, register with, or browse the Sites, or provide information to Flushmate online or offline, you signify your acceptance of Flushmate's then-current Privacy Policy. If you do not accept this Privacy Policy, you are not authorized to access, use or browse the Sites, or to provide information to Flushmate and must discontinue use of the Sites immediately. If you provide your information to Flushmate offline, the then-current Privacy Policy applies to Flushmate's collection and use of your information.

This Privacy Policy is subject to be revised or updated from time to time. Accordingly, you should check the Privacy Policy regularly for updates. Should the Privacy Policy be revised, Flushmate will post the changes on the Sites and the new Privacy Policy will be effective immediately upon posting. If Flushmate makes any material changes to the Privacy Policy, in addition to posting the revised Privacy Policy to the Sites, Flushmate will notify you in the manner and to the extent required by law. You can determine when the Privacy Policy was last revised by referring to the "Last Revised" date at the top of this page.

2. Types of Information Collected

We may collect personally identifiable information from you including, without limitation, non-public information about you that helps Flushmate identify you, such as first and last name, birth date, business title, employer, email address, employer address, office and home telephone number, mobile telephone number, password, account username, unique device identifier of your devices that connect to or access the Sites, order information, credit card, debit card and other payment information, billing and shipping information, purchasing and transaction history, occupation, preferences, information regarding products you purchase from us or products that you contact customer service about (e.g., serial number, fixture manufacturer, date of installation, place of purchase, etc.), information you provide to us when you register your product online, register in connection with our web or mobile applications, and other information that you provide to Flushmate or that is generated through your use of the Sites or interactions with Flushmate that are not otherwise publicly available.

If you are a California resident consumer, the categories of personally identifiable information that we collect include identifiers, customer records information, your gender identity, commercial information, internet or other electronic network activity information, geolocation data and information reflecting your preferences and characteristics relevant to your use of our products and services. Except as otherwise indicated, all of this information is collected for the purpose of providing you with the products and services that you wish to receive from us.

We also may collect non-personally identifiable information about you, such as information regarding your use of the Sites, your IP address, addresses of the relevant building(s) that you own, lease, manage or service and their restroom facilities (if you are using the subscription services for the remote monitoring and control of Flushmate IOT products), Sites usage statistics, time stamps, browsing history, general geographic location, product settings, adjustments made to products, type of device you use to connect to the Sites,

type of computer operating system you use (e.g., Microsoft Windows, Google Chrome OS, Mac OS, Android or iOS), the type of browser you use (e.g., Firefox, Chrome, Internet Explorer, Safari), the domain name of your internet service provider, and information regarding your Internet location when you see Flushmate's ads and whether you click on such ads. We also may receive certain aggregated or anonymous information regarding users of the Sites such as the age, gender, occupation, zip code, interests, purchase preferences, and language preferences of users of the site, as well as information collected through questionnaires and surveys. If you sign up to receive our subscription services for Flushmate IOT restroom products, please refer to our Terms of Service applicable to this service for information about what other non-personally identifiable information we collect. "Non-personally identifiable information" refers to information that does not personally identify the individual to whom the information relates, such as information that is aggregated by Flushmate or a third party, or information that is not linked to contact information or other personally identifiable information of an individual.

In the event that any of the non-personally identifiable information that we collect about you is maintained, used or shared in a manner that associates it with your name, contact information or other personally identifiable information, it will be treated as personally identifiable information. If you are logged into your account on the Sites, information such as the content you access, view, click on or search for when on the Sites, the devices from which you access such content and the length of time for which you view same, may become personally identifiable. In such an event, Flushmate will treat such information as personally identifiable information.

3. How We Collect Information

We may collect personally identifiable and/or non-personally identifiable information from you when you:

- Access, use or browse the Sites;
- Purchase products and/or services from the Sites
- Register for an account on the Sites;
- Sign up to receive announcements, emails or newsletters;
- Contact, communicate with or otherwise interact with Flushmate or its personnel via email, the Sites, fax, telephone, or by other means whether online or offline;
- Order or request products, literature, services or other information during your visit to the Sites, via email, fax or other online or offline means;
- Register your product with us;
- Access, use or adjust any product settings or functional parameters;
- Make a product warranty claim;
- Register, enroll or participate in any surveys, questionnaires, promotions, or any other services, events or activities online or offline sponsored by Flushmate or third parties, or offered in connection with the Sites of Flushmate's products or services ("**Activities**").

By using the Sites, or by submitting your personally identifiable information to Flushmate online or offline, you expressly consent to the storage and processing of your personally identifiable information in the United States in accordance with the laws of the United States, or in other jurisdictions.

We may obtain personally identifiable and/or non-personally identifiable information from third parties such as the owners or operators of the websites or applications where our advertisements appear (some of which may partner with Flushmate or with an advertisement network used by Flushmate), our service providers, affiliates, suppliers, vendors, distributors, Activities partners and sponsors, and other sources (e.g., offline records or publicly available information). We may combine personally identifiable information we collect with information that we obtain from these sources. We will treat any such combined information as personally identifiable information.

Flushmate automatically receives and records non-personally identifiable information on our server logs from your browser as well as through other analysis of the Sites. We also may collect information using cookies, web beacons, pixels, gifs, tags or similar technologies ("**Collection Technology**"), or through third parties using similar technologies. Collection Technology may operate as a piece of data stored on your browser or device, or may identify, compile, aggregate and/or collect information through other means. When you visit the Sites, your web browser may use Collection Technology to better enable you to navigate the Sites during your visit and upon your return. You may use the Sites even if you choose to reject or delete certain Collection Technology. Collection Technology also may be used by some of the other websites for which a link is placed on the Sites.

The Sites may use Google Analytics. Google Analytics uses Collection Technology to collect and store anonymous information about you, which may include the non-personally identifiable information described above. You can read Google Analytics' privacy policy at <http://www.google.com/intl/en/policies/privacy> and Google Analytics' Terms of Use at <http://www.google.com/analytics/tos.html>. You can opt-out from being tracked by Google Analytics in the future by downloading and installing Google Analytics' Opt-out Browser Add-on for your current web browser at <http://tools.google.com/dlpage/gaoptout?hl=en>. The Sites may use certain features of Google Analytics based on Display Advertising, such as:

"Demographics and Interest Reporting" to analyze information regarding the interests and demographics of users of the Sites. We use such non-personally identifiable information in the same manner as we use other non-personally identifiable information as described below.

"Remarketing with Google Analytics" to place ads on other sites directed to people who have visited the Sites.

"Google Display Network Impression Reporting" to report how people's interactions with our ads relate to their visits to the Sites.

You can opt-out of Google Analytics for Display Advertising and customize Google Display Network ads by changing the ad settings at: <https://www.google.com/settings/ads>.

Applications on mobile devices may transmit information to Flushmate about your location when you request information from the Sites. We may use that information to improve the products and services we provide to you.

When you use a Flushmate mobile application ("**Mobile App**"), we collect and use information about you in the same way and for the same purposes as we do when you use our Sites. In addition to this, we also use some other information that we collect automatically when you use our Mobile Apps. We collect information about Mobile App functionality that you access and use, which allows us to identify those areas of the Mobile App that are of interest to our users so that we can continuously improve our Mobile App, and to identify the products with which you interact, the locations thereof and the settings, adjustments and changes that you make thereto. The information we collect for this purpose enables us to indirectly identify you.

Each Mobile App also sends us the device's Unique Device Identifier (or "**UDI**"), a sequence of numbers or characters that are unique to your mobile device and may be your mobile telephone number. We use this UDI in connection with every action you take when operating and using the Mobile App. When you use a Mobile App, you can choose to allow access to your current location – provided by your mobile device using GPS or similar technologies – in order to identify nearby events or places of interest. If you choose to allow access, this location data may be collected anonymously and logged by our servers. You can disable the Mobile App's access to your location at any time through your phone settings menu.

Each Mobile App will also send us error-reporting information in the event that it crashes or hangs or the product with which the Mobile App facilitates connection is faulty, reports errors or is adjusted outside its allowable parameters, which enables us to investigate the error and to improve the stability of the Mobile App and the products for future releases. As part of these error reports, the Mobile App sends us information about the mobile device and product type and version, the UDI, the time the error or adjustment occurred, the feature being used, and the state of the application and product when the error or adjustment occurred.

You cannot control all the information that a Mobile App sends to us, but to the extent available you may change the available settings of the Mobile App under its "settings" menu, or changing the available settings of your mobile device. Alternatively, you can remove the Mobile App from your mobile device entirely.

4. How We Use Your Information

We may use the information we collect:

- To monitor and analyze information regarding your browsing and viewing preferences and to diagnose problems with the Sites;
- To analyze our users' demographics, interests, and purchasing practices;
- Fulfill orders, ship and confirm orders, and manage payment collection;
- To plan, improve and administer Activities;
- To process and respond to your product warranty claims, inquiries and other communications;
- For Sites administration, support and improvement;
- To alert you to new features, terms, Activities, special events, stores, products or services, and other useful information regarding any of the foregoing or Flushmate via email, direct mail telephone or other means;
- To market or promote other Flushmate products and/or services to you;
- To promote and improve the products and services we offer;
- To send announcements and newsletters, and to provide you with personalized content in connection with same;
- For the purposes for which you provided the information;
- For fraud prevention, internal operations, legal compliance, and other public purposes; and
- To enforce the Terms of Use.

In addition to the uses discussed above, Flushmate may use non-personally identifiable information in any manner so long as Flushmate uses such information in its de-identified or aggregated form. These uses may include, without limitation, analysis of trends and how the Sites are used; improving navigation of the Sites; analysis of the performance of the Sites and diagnosis of problems; analysis and developing advertisements and advertising campaigns; and providing you with special offers and promotions and determining the effectiveness of same.

Flushmate also may use your non-personally identifiable information and email address to present you with targeted content and advertisements (including on third party websites and applications). Such targeted content and advertisements may include marketing for the Sites, and the products or services of Flushmate or its business and advertising partners. Your non-personally identifiable information also may be used to optimize and determine the effectiveness of content and advertisements, and to analyze interactions with content and advertisements.

Some of our third party advertisers or display networks may participate in the Digital Advertising Alliance's Self-Regulatory Program for Online Behavioral Advertising and allow consumers the ability to opt-out of targeted advertising based on web activity tracking. For more information regarding the foregoing, please visit <http://www.aboutads.info/choices/>. Please note that after clicking the link and following the instructions provided therein, even if our third party advertisers or display networks participate in the Digital Advertising Alliance's Self-Regulatory Program for Online Behavioral Advertising and you opt out of targeted advertising based on web activity tracking, you still may receive standard advertisements from us and targeted advertisements from third parties. You may need to re-click the link and follow the instructions provided therein if you delete cookies or other Collection Technology or use a different computer, device or browser.

5. How We Respond To "Do Not Track" Signals

Flushmate does not respond to or alter its practices detailed herein based upon your selection of the "Do Not Track" setting or other "opt out" setting or feature that may be offered by your browser; however, Flushmate reserves the right to do so in the future.

6. Communications with You

You authorize Flushmate to transmit email or postal mail to you or to telephone you, to respond to your communications, promote our services and administer and provide information to you about Activities. If we send any emails to promote our services, unsubscribe instructions will be included in each such promotional email from Flushmate. Please note that such requests may take up to ten (10) business days to become effective. You may not opt out of receiving communications regarding your dealings with Flushmate, the Sites or technical information about the Sites.

For the purposes of any applicable law regarding notification of persons whose personal information was, or is reasonably believed to have been, acquired by an unauthorized person, any required notification may, where permitted by law, be made by the use of e-mail, telephone, fax or mail (including a notice printed in an available area of a bill or statement) or by posting a notice on the Sites. The specific means used is up to us, and we will use our best judgment based on the circumstances. Where any notice is to be sent to a specific address or number (such as an e-mail address, physical address, telephone number, etc.), we will use the latest available address in our records. **YOU AGREE TO THIS MEANS OF NOTIFICATION.**

7. Information Sharing with Third Parties

Flushmate may disclose the information it collects to others (i) to provide products or services to you; (ii) for purposes of outsourcing one or more of the functions described in this Privacy Policy to service providers who work on behalf of or with Flushmate including, without limitation, service providers, suppliers, payment processors, shippers, vendors, payment processors, advertisers, consultants and affiliates; (iii) to confirm or update information provided by you; (iv) to its business partners and co-sponsors of Activities or partners for our internal purposes; (v) to provide analytics for advertising and other purposes; (vi) in the event of any reorganization, merger, sale, joint venture, assignment, transfer or disposition of all or any portion of Flushmate's business or operations (including without limitation in connection with bankruptcy or any similar proceedings); or (vii) as otherwise authorized by you. Flushmate may share the personally identifiable information it collects with its business partners, distributors, vendors, and other third parties for their direct marketing purposes. Please note, however, that we do not share any personally identifiable information for any such purposes in connection with the subscription services for Flushmate IOT restroom products without first obtaining your express signed written consent.

We also may share your information in response to a subpoena, legal order or official request, when we believe you have acted in violation of the Terms of Use, to investigate, prevent or take action regarding suspected illegal activities, fraud or potential threats, or to exercise legal rights or defend against claims, when we believe that doing so may protect your safety or the safety of Flushmate or others, or as otherwise permitted or required by law.

We also may use and share non-personally identifiable information with other third parties. Additionally, we may take personally identifiable information and de-identify it and share it in a de-identified, anonymized or aggregated form with advertisers, business partners, and/or other third parties in order to analyze the Sites usage, demographics, or interests, improve the Sites or Flushmate's products or services, perform services on the Sites, improve the user experience, or for similar purposes. We will not re-identify such data and we will ask our contracting parties to agree to keep the data in its de-identified or anonymized form.

8. Children

The Sites are not directed toward children under 18 years of age nor does Flushmate knowingly collect information from children under 18 on the Sites or offline. If you are under 18, you are not permitted to register for an account on the Sites or to otherwise submit any personally identifiable information to Flushmate. If you provide information to Flushmate through the Sites or offline, you represent that you are 18 years of age or older.

9. Protection of Personal Information

Flushmate uses reasonable administrative, physical and electronic security measures to protect against the loss, misuse and alteration of personally identifiable information. No transmission of data over the internet, wi-fi, Bluetooth®, or other communication protocol is guaranteed to be completely secure. It may be possible for third parties not under the control of Flushmate to intercept or access transmissions or private communications unlawfully. While we strive to protect personally identifiable information, neither Flushmate

nor our service providers can ensure or warrant the security of any information you transmit to us over the internet. Any such transmission is at your own risk.

10. Updating Your Information

You are responsible for keeping your information current. You may update your information by contacting us at privacy@sloan.com. We will use reasonable efforts to process any change you make; provided, however, that requests to delete information are subject to Flushmate's internal reporting, processing and retention policies and all applicable legal obligations.

11. Notice of Privacy Rights of California Residents

Flushmate has adopted a policy of not sharing your personally identifiable information with third parties for their direct marketing purposes if you request that we do not do so ("**Opt-Out Policy**"). You may make such a request by sending us an email at privacy@Sloan.com. When contacting us, please indicate your name, address, email address, and what personally identifiable information you do not want us to share with third parties for their direct marketing purposes. Please note that there is no charge for controlling the sharing of your personally identifiable information or for processing this request.

If you are a California resident and have provided personal information to a business without an Opt-Out Policy, you may be entitled by law to request certain information regarding disclosures of personally-identifiable information made by such business to third parties for the third parties' direct marketing purposes during the immediately preceding calendar year ("**Disclosure Request**"). Such business is not required to respond to more than one Disclosure Request per customer each year, or to respond to requests made by means other than through the contact information designated by the business for such purposes. However, please note that due to Flushmate's Opt-Out Policy described in the preceding paragraph, we are not obligated by law to provide you with the requested information.

If you are still interested in making a Disclosure Request, please contact us at privacy@sloan.com. In the Disclosure Request, specify that you seek your "California Customer Choice Privacy Notice." Please allow thirty (30) days for a response, but note that Flushmate is entitled by law to respond to your Disclosure Request by notifying you of your right to prevent the disclosure of personal information pursuant to our Opt-Out Policy.

If you are a California resident consumer, effective January 1, 2020, you are now afforded additional rights under the California Consumer Privacy Act (CCPA). Under the CCPA, California resident consumers are afforded the right to contact us and submit to us a request to know any or all of the following:

1. Specific pieces of personal information that we have about you
2. The categories of personal information we have collected about you
3. The categories of sources from which personal information about you was collected
4. The categories of personal information about you that we sold or disclosed for a business purpose
5. The categories of third parties to whom the personal information about you were sold or disclosed for a business purpose; and
6. The business or commercial purpose for collecting or selling personal information about you

As a California resident consumer, you are also afforded

1. the right to have your personal information deleted or transferred to a designated third party;
2. the right to opt-out of any sale of your personal information to a third party; and
3. the right not to be discriminated against should you exercise any of your CCPA rights.

Please note that under California law, as applicable to California resident consumers, your personal information includes any information that can be reasonably linked directly or indirectly to a particular consumer or particular household.

If you are a California resident consumer, you or your legally authorized agent acting on your behalf may submit your personal information requests by emailing us at privacy@sloan.com or by calling us at the following toll free number: 888-756-2612. Please note that when receiving your requests we have the obligation and right to use reasonable means to verify your identity when processing your request. We perform this verification procedure at no cost to you or your legally authorized agent. Upon receiving your verified request, we will confirm receipt of the request within 10 business days and we will provide a substantive response within 45 calendar days.

Selling Your Personal Information

We do not sell any of your personal information to a third party, i.e. for monetary compensation or in consideration for something of value to be received from the recipient of your information. If we do, you are afforded the right to opt-out of any sale or sharing of your personal information for value and you may opt-out by emailing us at privacy@sloan.com or by calling us at the following toll free number: 888-756-2612. Except as otherwise indicated, the information sharing that we do is so that we can provide you with the products and services that you have requested we provide you.

Responding to California Consumer Privacy Requests

We also reserve the right not to respond to or to deny a request to know or a request to allow access to or deletion of your information or to limit your rights under certain circumstances (e.g. if the request poses an unreasonable risk, we are lawfully entitled to do so, we are lawfully entitled to maintain an archive copy of your information despite a request to delete, if it is necessary to detect security incidents or if the rights of another individual might be violated, or if the request requires that we or our vendor, user or partner undertake a search or provide an accessible format when the information that is the subject of the request does not lend itself to a search or does not lend itself to the format being requested by the individual making the request). In some instances, this may mean that we and our vendor(s), other(s) and business partners are able to retain your personal information even if you withdraw your consent or if a California resident consumer, we and our vendor(s), other user(s) and business partner(s) can maintain an archive copy of your personal information on a backup system notwithstanding a request to delete your personal information. Moreover, we have the legal obligation not to transmit to you or others certain information deemed highly sensitive (assuming that we even have such information) but we should always be able to provide you with information about whether we have such highly sensitive information about you.

Unless we are designated as the Service Provider under the CCPA, please do not submit personal information requests to any of our vendors, users or business partners as they may not necessarily be required to respond to personal information requests that they may receive directly from our customer or clients. On the other hand, if we are the designated Service Provider for any product or service that is being offered to you, please direct your personal information requests directly to the company or other organization that has retained us as its/their Service Provider.

12. Links

You may have the opportunity to follow links on the Sites to other sites that may be of interest to you. Flushmate endeavors to only link to reputable organizations. Because other sites may not be hosted or controlled by Flushmate, we are not responsible for the privacy practices of those sites or the content provided thereon. Therefore, the privacy policies with respect to other sites may differ from those applicable to the Sites. We encourage you to review the privacy policies of each other site. This Privacy Policy only applies to information collected and maintained by Flushmate.

13. International Visitors

The Sites are hosted in the United States and are intended only for United States visitors. We do not solicit any personal data transmitted to us from others who are located in countries outside of the United States. If you are located in an EU member country, the United Kingdom, Iceland, Liechtenstein, Norway or Switzerland and you have sent us your personal data unsolicited, after we have completed our review of your communication, we will appropriately delete your communication, including any personal data that may be contained therein.

We may share, as described in this Privacy Policy, information with our affiliates and subsidiaries, and third parties. We may disclose information in response to legal process and lawful requests by public authorities in the United States and other countries, for the purposes of law enforcement and national security.

QUESTIONS? If you have any questions or concerns regarding this Privacy Policy, please contact us at privacy@sloan.com. Please note that email communications may not be secure. Accordingly, you should not include personal or other sensitive information in your email correspondence to the Sites or Flushmate.

* The effective date appearing in the header of this page under the version control block is system-generated and is only for administrative and versioning purposes. That date does not constitute or modify the Effective Date or effectiveness of these Terms or Policies.