PRIVACY POLICY

SBD Scala, Inc., is responsible for the use and protection of your personal information, and therefore we provide you with the following information:

Scope. This Privacy Policy applies to personal information collected online, used and disclosed by SBD Scala Inc. (collectively referred to as “Scala Pro”) in connection with its websites, microsites, mobile sites or mobile apps that expressly adopt, display or link to this Privacy Policy (collectively referred to as our “Sites”). It also applies to personal information we collect, use and disclose in connection with Scala Pro pages on social media sites, such as Facebook, Twitter, Google Plus or others (collectively referred to as our “Social Media Pages”).

NOTE: Scala Pro licenses the use of its trademarks to unrelated third parties which operate websites independently from Scala Pro. This Privacy Policy does not cover the websites of these third parties. These third parties have separate and independent privacy policies which we recommend you read carefully.

This Privacy Policy answers the following questions:

1. What information does Scala Pro collect about you?
2. How do we use the Personal Information we collect about you?
3. Does Scala Pro share your information with third parties?
4. What Other Information about you does Scala Pro collect?
5. What choices do you have over how Scala Pro uses and discloses your Personal Information?
6. How does Scala Pro secure your Personal Information?
7. How can you access, change, or delete your Personal Information?
8. Third party services
9. Retention period
10. Use of services by minors
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12. Will this Privacy Policy change?
13. How can I contact Scala Pro?

1. What information does Scala Pro collect about you?

“Personal Information” is information that identifies you as an individual or relates to an identifiable individual.

We and our service providers may collect and combine Personal Information about you from a variety of sources, including:

• Through the Services, for example, when you sign up for a newsletter, marketing emails and other commercial electronic messages (e.g., on upcoming promotions, new products, etc.), register an account to access the Services (e.g. to register your products, to ask for support, to participate in our contests or competitions, to make inquiries regarding product warranties), or make a purchase, or through our Social Media Pages.

• From Other Sources. We receive your Personal Information from other sources, for example:
  
  o Publicly available databases, such as LinkedIn or local Trade or Industrial Associations' registries.
  
  o Joint marketing partners, when they share the information with us, including: privately held marketing or survey / enquiry databases.
  
  o If you connect your social media account to your Services account, you will share certain Personal Information from your social media account with us, for example, your name, email address, photo, list of social media contacts, and any other information that may be
or you make accessible to us when you connect your social media account to your Services account, depending on the preferences / choices you have selected within your social media account’s setting, or the opinions expressed (e.g., “Likes”) you have provided within our Social Media pages.

We generally collect the following types of Personal Information:

- Your Name
- Mailing address
- Email address
- Birthdate
- Telephone number
- Mobile phone number
- Postal/zip code, state/province, and country
- Username and password (related to your account)
- Purchase, order information and payment details
- Demographic information (for example number of household members, country of residence, age and gender)
- Information related to customer satisfaction surveys, customer requests or queries
- Purchasing habits and other information, including registration of products purchased
- Interests and hobbies
- Information on products you want, like or own
- Bank information (e.g. for special offers – reimbursement, warranty extension, prizes or contests)

On certain Sites, we allow you to use your personal social media account, on social media sites ("Personal Social Media Account"), to provide Personal Information to us when you participate in certain features on our Sites. This Personal Information may include the following:

- Your name and/or nickname
- Profile picture
- Gender
- Networks
- User id
• List of friends and related contact details
• Language
• Voice recordings
• Video and photographs
• Birthday
• Education
• Work history/Profession
• Address
• Interests/Hobbies
• "Likes" or online group membership
• Country
• Opinions expressed (e.g. when replying around the satisfaction about one of our products)

It is also possible that we will be able to continue collecting this information from your Personal Social Media Accounts should the information be revised by you later.

We need to collect Personal Information in order to provide the requested Services to you. You may choose not to provide us with certain requested information, but then you might not be able to take advantage of some of our Service features or we may not be able to provide you with the Services.

If you disclose any Personal Information relating to other people to us or to our service providers in connection with the Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

2. **How do we use the information we collect about you?**

The Personal Information we collect from you helps us personalize your experience with us and our communications to you and helps us continually improve your experience with our Services. We and our service providers use the Personal Information collected above for the following purposes including:

• **Providing the functionality of the Services and fulfilling your requests, including:**
  
  o Opening and arranging access to your registered account.

  o Responding to your inquiries and fulfilling your requests for example when you contact us via one of our online contact forms or chat lines.

  o Processing your order or other transactions, including warranty and product registration, claim, or request, and providing related customer service.
• To send administrative information to you, such as changes to our terms, conditions and policies.

• To allow you to send messages to another person if you choose to do so.

We will engage in these activities to manage our contractual relationship with you, and/or to take steps at your request prior to entering into a contract, and/or to comply with a legal obligation.

• Providing you with our newsletter and/or other marketing materials and facilitating social sharing.

  o To send you advertising and marketing related emails, text messages, and postal mail with information about our services, new products and other news about our company.

  o To facilitate social sharing functionality that you choose to use.

  o To send wish lists or other emails on your behalf.

We will engage in this activity with your consent.

• Analysis of Personal Information for business reporting and providing personalized services.

  o To better understand you, so that we can personalize your experiences when using our Services and provide you with information and/or offers tailored to your interests.

  o To better understand your preferences so that we can deliver content via our Services that we believe will be relevant and interesting to you.

  o To analyze or predict our users’ preferences in order to prepare aggregated trend reports on how our digital content is used and perform market research, so we can improve our Services.

We will provide personalized services either with your consent or because we have a legitimate interest.

• Allowing you to participate in sweepstakes, contests or other promotions.

  o We may offer you the opportunity to participate in a sweepstakes, contest or other promotion.

  o Some of these promotions have additional rules containing information about how we will use and disclose your Personal Information.

We use this information to manage our contractual relationship with you.

• Aggregating and/or anonymizing Personal Information.

  o We may aggregate and/or anonymize Personal Information so that it will no longer be considered Personal Information. We do so to generate other data for our use, which we may use and disclose for any purpose.

• Accomplishing our business purposes.
For data analysis, for example, to improve the efficiency of our Services.

For audits, to verify that our internal processes function as intended and are compliant with legal, regulatory or contractual requirements.

For fraud and security monitoring purposes, for example, to detect and prevent cyberattacks or attempts to commit identity theft.

For improving and developing our products and services.

For enhancing, improving, or modifying our current products and services.

For identifying usage trends, for example, understanding which parts of our Services are of most interest to users.

For facilitating recalls.

For processing job applications.

For determining the effectiveness of our promotional campaigns, so that we can adapt our campaigns to the needs and interests of our users.

For operating and expanding our business activities, for example, understanding which parts of our Services are of most interest to our users so we can focus our energies on meeting our users' interests.

We engage in these activities to manage our contractual relationship with you, to comply with a legal obligation, and/or because we have a legitimate interest.

3. **Does Scala Pro share your information with third parties?**

We do not sell, rent, or trade your personal information to unrelated third parties. We may share your personal information with the following:

- our affiliates and third-party service providers in order to perform tasks on our behalf such as the following:
  - facilitating your purchase
  - assisting in servicing our products
  - helping you exchange products
  - providing and improving our communications with you
  - responding to requests to our investor relations
- as required to cooperate with a subpoena, search warrant or other legally valid inquiry, court order or other legal process, or as required or permitted by law
- to protect the rights, property or safety of our Sites, our users or others, including where necessary for the establishment, exercise or defense of legal claims.

If Scala Pro were ever merged with or acquired by another company, or if we acquire another business entity or are involved in a corporate reorganization or other change of control, or if we sell substantially all the assets of a division, affiliate or subsidiary, some or all of the personal information collected about you could be shared with the acquiring or acquired company.

We may also share aggregate data about our sales, customers, traffic patterns, and other related Site information with third parties, but none of this data is connected to an individual's personal information.
4. What other information about you does Scala Pro collect?

"Other Information" is any information that does not reveal your specific identity or does not directly relate to an identifiable individual. Other Information includes:

- Browser type and version
- Operating system
- IP Address (see below for further information)
- The Internet service provider used to access our Services
- Use of links to arrive at our Services and the IP address from which you arrived
- Web pages requested and viewed
- Time spent on our Services
- For our mobile websites and apps, technical information about the device used, such as screen size, cookie support by the device and how images may appear
- App usage data
- Other information collected through cookies, pixel tags, and other technologies described below
- Demographic information and other information provided by you that does not reveal your specific identity
- Information that has been aggregated in a manner such that it no longer reveals your specific identity

Your IP address is automatically assigned to your computer by your Internet Service Provider. An IP address may be identified and logged automatically in our server log files whenever a user accesses the Services, along with the time of the visit and the page(s) that were visited. Collecting IP addresses is standard practice and is done automatically by many websites, applications and other services. We use IP addresses for purposes such as calculating usage levels, diagnosing server problems and administering the Services. We may also derive your approximate location from your IP address (see "Location" below).

We may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat Other Information as Personal Information under applicable law, then we may use and disclose it for the purposes for which we use and disclose Personal Information as detailed in this Policy.

We and our service providers collect Other Information in a variety of ways, including:

- Through your browser or device:
  - Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Mac), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version and the name and version of the Services
(such as the Apps) you are using. We use this information to ensure that the Services function properly.

• **Through your use of the Apps**

  o When you download and use the Apps, we and our service providers may track and collect App usage data, such as the date and time the App on your device accesses our servers and what information and files have been downloaded to the App based on your device number.

• **Physical Location Information**

  o Our Services and HTML-formatted emails include features that may require collecting different types of location information (such as IP Address, GPS coordinates or postal code) that we then use for the specific feature you have selected, such as:

    ▪ **Email.** Our emails use your IP Address to determine the postal code where you are located when you open the email. This allows us to tailor content to you, such as a map of nearby stores carrying our products. The specificity of the location can vary depending on the device used to open our emails. Your email program may allow you to prevent the pixel tags or images in the emails you receive from us from downloading, which will also prevent our service provider from accessing your location information. You can also unsubscribe from receiving our emails, by sending an email to info@scalapros.com.

    ▪ We may also share your device’s physical location, combined with information about what advertisements you viewed and other information we collect, with our marketing partners to enable them to provide you with more personalized content and to study the effectiveness of advertising campaigns.

• **Cookies**

  o We and our third-party service providers use “cookies”. Cookies assign a unique identification to your device and are typically stored directly on your device by your web browser.

  o The information we and our third-party service providers collect through cookies, pixel tags and similar technology includes the following:

    ▪ Your interactions with our Services and with our advertisements

    ▪ The time of your visit to our Services

    ▪ Items and products browsed, items put into your shopping cart, and whether you purchase any or all of those items

    ▪ Confirmation when you open email from us, including the time you open the email and whether you click on any links in the email

    ▪ Sites you visit after visiting one of our Sites

    ▪ Language preferences
• Other traffic data

  o We and our service providers use cookies for: security purposes, to facilitate navigation, to display information more effectively, and to personalize your experience, to tailor email marketing to you based on your use of the Services, determine return visitors, keep track of items in your cart, and serving tailored ads on other sites, as described below.

  o We also gather statistical information about use of the Services in order to continually improve their design and functionality, to improve and better transact business, to understand how Services are used, measure which parts of our Sites are most visited or used, monitoring the number of visitors to our Sites, and assist us with resolving questions regarding the Services.

  o Cookies further allow us to select which of our advertisements or offers are most likely to appeal to you and display them while you are on the Services and on other sites. We may also use cookies or other technologies in online advertising to track responses to our ads and measure the effectiveness of our advertising.

  o Our systems may not recognize “Do Not Track” headers from some or all browsers. If you do not want information collected through the use of cookies, most browsers allow you to automatically decline cookies or be given the choice of declining or accepting a particular cookie (or cookies) from a particular website. You may also wish to refer to http://www.allaboutcookies.org/manage-cookies/index.html. If, however, you do not accept cookies, you may experience some inconvenience in your use of the Services. You also may not receive advertising or other offers from us that are relevant to your interests and needs.

• Pixel tags and other similar technologies

  o We may also use pixel tags (also known as web beacons, web bugs, and clear GIFs) in providing the Services. A pixel tag is a nearly invisible pixel-sized graphic image on a webpage or in an email message. We use these technologies to, among other things, track the actions of users of the Services (including email recipients), measure the success of our marketing campaigns, measure which parts of our Sites are most visited or used, and compile statistics about usage of the Services and response rates.

• Third-party analytics

  o We use third-party analytics providers, such as Google® Analytics, which uses cookies and similar technologies to measure traffic and usage trends, and to help us better understand your use of and interaction with our Services. This service may also collect information regarding the use of other websites, apps and online resources. For more information on how Google uses data when you use our Services, click here, and opt out of Google’s practices by downloading the Google Analytics opt-out browser add-on, available here. https://tools.google.com/dlpage/gaoptout.

• Other Information from Social Media Pages

  o Similar to the navigational information described above, the social media sites where we have our Social Media Pages may provide aggregate information and analysis to us about visitors to our Social Media Pages. This allows us to better understand and analyze our user growth, general demographic information about the users of, and interaction with content on, our Social Media Pages.
• Using Adobe Flash technology (including Flash Local Shared Objects (“Flash LSOs”)) and other similar technologies

  o We may use Flash LSOs and other technologies to, among other things, collect and store information about your use of the Services. If you do not want Flash LSOs stored on your computer, you can adjust the settings of your Flash player to block Flash LSO storage using the tools contained in the Website Storage Settings Panel. You can also go to the Global Storage Settings Panel and follow the instructions (which may explain, for example, how to delete existing Flash LSOs (referred to as “information”), how to prevent Flash LSOs from being placed on your computer without your being asked, and how to block Flash LSOs that are not being delivered by the operator of the page you are on at the time). Please note that setting the Flash Player to restrict or limit acceptance of Flash LSOs may reduce or impede the functionality of some Flash applications.

• We additionally use Other Information gathered through technology for identifying and addressing difficulties visitors may experience in accessing our Services.

5. What choices do you have over how we use and disclose your Personal Information?

We give you choices about the information we collect and how we communicate with you and use and disclose your information.

a. Email: You may opt-out of our marketing emails by following the instructions listed in the email that you received. However, even if you opt-out you may still receive non-marketing emails, such as order/shipping confirmations, changes to service, product registrations, product recalls or customer service communications.

b. Text messaging/IM: You may opt out of mobile text messages (e.g., SMS, MMS) and other instant messages (e.g., WhatsApp, Facebook Messenger) from us, by following the opt-out instructions accompanying such messages.

c. Postal Marketing: If you no longer want to receive marketing materials from us via regular postal mail, please contact us at info@scalapros.com and tell us that you want to be removed from the Scala Pro postal mailing list, including the postal address you wish to have removed.

d. Cookies: You may set your web browser to notify you when you receive a cookie or to not accept certain cookies. However, if you decide not to accept cookies from our Services, you may not be able to take advantage of all of the features of our Services.

e. Our sharing of your Personal Information with affiliates for their direct marketing purposes: If you would prefer that we discontinue sharing your Personal Information on a going-forward basis with our affiliates for their direct marketing purposes, you may opt-out of this sharing by contacting us as at info@scalapros.com.

We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt-out of receiving marketing-related emails from us, we may still send you important administrative messages, from which you cannot opt-out.

6. How does Scala Pro secure your information on its Sites?

If you are using one of our Sites with an online store, we designed our online store to accept orders only from Web browsers that permit communication through Secure Socket Layer (SSL) technology, which encrypts your information while it is being transmitted to us. Browsers that do not meet this requirement will be prevented from navigating the online store section of our Sites. We also use firewalls and have implemented other reasonable technical, administrative and physical measures designed to protect the
personal information in our custody or control from unauthorized access, use, modification and disclosure. While we implement the above security measures on our Websites, you should be aware that 100% security is not always possible.

7. **How can you access, change or delete your Personal Information?**

If you would like to request to access, update, correct, suppress, restrict, or delete Personal Information previously provided to us, object to the processing of Personal Information, 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 can do this by emailing us at info@scalapros.com.

In your request, please make clear what Personal Information you would like to have changed, whether you would like to have your Personal Information suppressed from our database or otherwise let us know what limitations you would like to put on our use of your Personal Information. 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 request certain Personal Information for the purposes of verifying the identity of the individual seeking access to their Personal Information records. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion (e.g., when you make a purchase or enter a promotion, you may not be able to change or delete the Personal Information provided until after the completion of such purchase or promotion).

You may also access, update and correct inaccuracies in certain Personal Information through your account for certain Services.

8. **Third party services**

Scala Pro licenses the use of its trademarks to unrelated third parties which operate websites independently from Scala Pro. This Privacy Policy does not cover the privacy, information, or other practices of any third parties, including any third party operating any website or service to which the Services link, including any third-party website or service on which Scala Pro maintains its Social Media Pages. These third parties have separate and independent privacy policies which we recommend you read carefully. The inclusion of a link on the Services does not imply endorsement of the linked site or service by us or by our affiliates. In addition, we are not responsible for the information collection, use, disclosure or security policies or practices of other organizations, such as Facebook, Twitter, Google, or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including with respect to any Personal Information you disclose to other organizations through or in connection with the Apps or our Social Media Pages.

9. **Retention period**

We retain Personal Information for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the Services to you (for example, for as long as you have an account with us or keep using the Services);

- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); or
• Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

Please note that where you unsubscribe from our marketing communications, we will keep a record of your e-mail address to ensure we do not send you marketing e-mails in the future.

10. **Use of services by minors**

The Services are not directed to individuals under the age of eighteen (18), and we do not knowingly collect Personal Information from individuals under 18.

11. **Third party payment services**

We may use a third-party payment service to process payments made through the Services. If you wish to make a payment through the Services, your Personal Information will be collected by such third party and not by us and will be subject to the third party’s privacy policy, rather than this Privacy Policy. We have no control over, and are not responsible for, this third party’s collection, use and disclosure of your Personal Information.

12. **Will this Privacy Policy change?**

We may make changes to this Privacy Policy at any time, so please review it periodically. We will update the effective date of the Privacy Policy at the time a change is made. Your use of the Services following these changes means that you accept the revised Privacy Policy.

13. **How can I contact Scala Pro?**

If you have questions or concerns with respect to our Privacy Policy, please contact the Privacy Policy Manager by sending an email to: info@scalapros.com and include your question.

This Privacy Policy is effective: Dec 2018.