

# Progressive Components Privacy Policy

## Background:

Progressive Components understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all employees, customers, and suppliers and will only use this data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

### 1. Information About Us

Name: Progressive Components International Corporation

Registered Address: 235 Industrial Drive, Wauconda, IL 60084

Data Protection Officer: Jeff Hintz

Email address: [compliance@procomps.com](mailto:compliance@procomps.com)

Telephone number: 847-487-1000

### 2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

### 3. What is Personal Data?

Personal Data is defined by the General Data Protection Regulation (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal Data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data we use is set out in section 5, below.

### 4. What are my rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in section 11.
- b) The right to access the personal data we hold about you. Section 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of the data held by us is inaccurate or incomplete. Please contact us using the details in section 11 to find out more.

- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in section 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose(s).
- g) The right to data portability. This means that, if you have provided personal data to us directly, and we are using it with your consent or for the performance of a contracted service, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.

Rights in relation to automated decision making and profiling – where processing is performed automatically (that is without human involvement) and includes completing a decision on the individual, the individual has the right to ask for this to be stopped and for the decision to be made by manual means (that is, by a person reviewing the data).

Subject access: the right to request information about how Personal Information is being processed including whether Personal Information is being processed and the right to be allowed access to that data and to be provided with a copy of that data along with the right to obtain the following information:

- a) The purpose of the processing
- b) The categories of personal data
- c) The recipients to whom data has been disclosed or which will be disclosed
- d) The retention period
- e) The right to lodge a complaint with the ICO in the United Kingdom
- f) The source of the information if not collected direct from the subject
- g) The existence of any automated decision making.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details in section 11.

If you believe that Progressive Components has not complied with your rights in relation to your personal data in relation to processing in or related to the United Kingdom, you can complain to the Information Commissioner's Office. Their contact details are available at [www.ico.org.uk](http://www.ico.org.uk).

## 5. What Personal Data Do You Collect?

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- Name
- Date of Birth
- Gender
- Address
- Email Address
- Telephone Number
- Business Name
- Job Title

- Payment Information
- Information about your preferences and interests

Our website may also collect Personal Information passively, through the use of cookies. A cookie is a small text file that writes to your hard drive. The cookie file contains your computer's IP address and a user ID. The user ID links any orders you have placed on our site to your Personal Information. A user ID has no personally identifiable information attached to it unless you place an order on our site. Our website uses cookies to enhance the guests' experience and help us improve our services. For example, we may use cookies to keep track of your basket or shopping cart while you are shopping on our site or to track your activity.

Progressive Components uses web beacons in emails to track traffic from the email to specific pages on our websites. You may be able to adjust your browser so that your computer either does not accept cookies or notifies you when a website tries to deposit a cookie into your computer. Our cookies do not contain confidential Personal Information such as your home address, telephone number, or credit card information. We do not exchange cookies with any third parties.

## 6. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one of the following purposes:

- Providing and managing your account
- Supplying our products and services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalizing and tailoring our products and services for you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email and mail that you have opted-in to. You may unsubscribe or opt-out at any time by clicking unsubscribe at the bottom of any marketing email that is sent, or subsequently by writing to [insidesales@procomps.com](mailto:insidesales@procomps.com) with the request.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone, text message, or mail with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and privacy regulations, and you will always have the opportunity to opt-out.

Progressive Components collects and uses your Personal Information to:

- a) Conduct business with you
- b) Undertake our contractual responsibilities for our customers
- c) Improve your experience with us
- d) Help you send us reviews, enquiries and complaints

- e) Permit you to apply for a job

We process Personal Information submitted by customers for the purpose of providing the above-referenced services (collectively, the “Services”) to customers. To fulfil these purposes, we may access Personal Information to provide the Services, to prevent or address service or technical problems, to respond to customer support matters, to follow the instructions of a customer who submitted the Personal Information, or in response to contractual requirements with our customers and service providers.

Where you have entered into a contract with Progressive Components, we will process your Personal Information in order to meet our obligations and exercise our rights in terms of that contract.

In other cases, Progressive Components has a legitimate interest in processing Personal Information which allows us to provide you with a better customer service; and to send marketing emails to you where you have purchased goods from us and where you have not opted out from receiving those messages.

There may be some occasions where we seek your consent to process Personal Information but in those cases we will provide full details of what Progressive Components is seeking consent for, so that you will be able to carefully consider whether to provide that consent.

When processing Personal Information Progressive Components ensures that:

- a) it is processed lawfully, fairly and in a transparent manner (‘lawfulness, fairness and transparency’);
- b) it is collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; (‘purpose limitation’)
- c) it is all adequate, relevant and limited to what is necessary in relation to the purposes for which the Personal Information is processed; (‘data minimisation’)
- d) it is all accurate and, where necessary, kept up to date and that reasonable steps will be taken to ensure that Personal Information that is inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (‘accuracy’)
- e) it is kept in a form which permits identification of you for no longer than is necessary for the purposes for which the Personal Information is processed; (‘storage limitation’)
- f) it is processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (‘integrity and confidentiality’).

Progressive Components will facilitate any request from you to exercise your rights under data protection law and the General Data Protection Regulation as appropriate, always communicating in a concise, transparent, intelligible and easily accessible form and without undue delay.

Progressive Components will also:

- a) ensure that the legal basis for processing Personal Information is identified in advance and that all processing complies with the law.
- b) not do anything with your Personal Information that you would not expect given the content of this policy.
- c) ensure that appropriate information is provided advising how and why Personal Data is being processed, and in particular advising data subjects of their rights.
- d) only collect and process the Personal Information that we need for the purposes we have identified in advance.
- e) ensure that as far as possible the Personal Information we hold is accurate, or a system is in place for ensuring that it is kept up to date as far as possible.
- f) only hold onto your Personal Information for as long as it is needed after which time we will securely erase or delete the personal data. Progressive Component's Data Retention Policy sets out the appropriate period of time.
- g) ensure that appropriate security measures are in place to ensure that Personal Information can only be accessed by those who need to access it and that it is held and transferred securely.

#### **7. How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for as long as necessary for the purpose of compliance for any orders processed and the details contained within the order, or for other essential purposes such as complying with our legal obligations, maintaining business and financial records, resolving disputes, maintaining security, detecting and preventing fraud and abuse, and enforcing our agreements. After such time we will securely erase or delete the personal data. Progressive Component's Data Retention Policy sets out the appropriate period of time.

#### **8. How and Where Do You Store or Transfer My Personal Data?**

We will only store or transfer your personal data within our global organization. This means that your personal data will be fully protected under the GDPR or to equivalent standards by law.

We share your data within the group of companies of which we are a part. Where this involves the transfer of personal data outside the US, our group ensures that personal data is protected by requiring all companies within the group to follow the same rules with respect to personal data usage. These are known as "binding corporate rules".

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- Multi-layer access to physical copies of previous orders, including code-operated entrances and alarm codes.
- Up-to-date IT security measures to protect your personal data from risks during data transmission and to prevent third parties from gaining access to it.

In addition to disclosures to third party providers and companies within the group as described above, we may disclose or transfer Personal Information in connection with, or during negotiations of, any merger, sale of company assets, product lines or divisions, or any financing or acquisition. We may also disclose Personal Information to prevent damage or harm to us, our Services, or any person or property, or if we believe that disclosure is required by law (including to meet national security or law enforcement requirements), or in response to a lawful request by public authorities. Except as described in this Privacy Policy, we will not otherwise disclose Personal Information to third parties unless you have been provided with an opportunity to opt-in to such disclosure.

## 9. Do You Share My Personal Data?

We may sometimes contract with third parties to supply products and services to you on our behalf. These may include payment processing, delivery, and marketing. In some cases, those third parties may require access to some or all of your personal data that we hold. For example:

- Our suppliers may need your name, company address, and contact details for delivery to the correct person should we decide it is in your interest to receive the products directly from them; whether this interest is financial or for the purpose of time-efficient deliveries.
- Couriers may be given your name, company address, and email address to inform you of the date on which they will be making a delivery.

If any of your personal data is required by a third-party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third-party's obligations under the law, as described above in section 8.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## 10. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in section 11.

There is not normally any charge for a subject access request. If your request is "manifestly unfounded or excessive" (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will work to respond to your subject access request within 14 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## 11. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details for the attention of the Data Protection Officer:

Data Protection Officer: Jeff Hintz

Email address: [compliance@procomps.com](mailto:compliance@procomps.com)

Telephone Number: 847-487-1000

Postal Address: Progressive Components, 235 Industrial Drive, Wauconda, IL 60084

## 12. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available online at <https://procomps.com>