# Privacy Policy

Effective date: May 25, 2018

Sunnen Products Company (and their subsidiaries, affiliates, representatives, and employees – collectively “Sunnen”, “us”, “we”, or “our”) is dedicated to protecting your privacy and the handling of personal information we may collect in the course of doing business. This includes the use of any Sunnen websites; sub-domains; any associated web-based and mobile applications, and any back-office systems (collectively, the “Service”).

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible from any of our websites.

## Information We Collect and Use

We collect several different types of information for various purposes to provide and improve our Service to you.

### Types of Data Collected

#### Information you give to us:

We collect and process your personal data if you purchase certain products or services from Sunnen or supply us with certain products or services and we need your data to complete the obligation.While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

* Email address
* First name and last name
* Phone number
* Address, State, Province, ZIP/Postal code, City
* Cookies and Usage Data

#### Information we collect about you from your use of our Site or Services

We may also collect information on how our web services are accessed and used ("Usage Data"). This Usage Data may include:

* IP address of the requesting computer
* Date and time of the request
* Name and URL of the retrieved file
* Amount of transmitted data
* Access status (file transfer, file not found, etc.)
* Detection information for the browser and operating system
* Name of the user’s internet access provider
* Website from which access was initiated

The collection, processing, and use of this data is to enable the use of the website, and for system security and technical administration of the network infrastructure. A comparison with other data or a transfer to third parties, even in excerpts, does not take place.

The data collected through the voluntary submission of information on Sunnen websites will be used solely for the purpose of processing the request and performing any services you may have requested.

#### Tracking Cookies Data

We use cookies and similar tracking technologies to track the activity on our web services.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other technologies that may be used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. Please consult the documentation on your browser for further information on how cookies are handled and your options. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

* **Session Cookies.** We use Session Cookies to operate our Service.
* **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
* **Security Cookies.** We use Security Cookies for security purposes.

## How we use the information we collect

Sunnen Products Company uses the collected data for various purposes:

* To provide and maintain our Service
* To notify you about changes to our Service
* To allow you to participate in interactive features of our Service when you choose to do so
* To provide customer support
* To gather analysis or valuable information so that we can improve our Service
* To monitor the usage of our Service
* To detect, prevent and address technical issues
* To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information

## Legal Basis for Processing Personal Data Under General Data Protection Regulation (GDPR)

If you are from the European Economic Area (EEA), Sunnen Products Company’s legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

Sunnen Products Company may process your Personal Data because:

* We need to perform a contract with you
* You have given us permission to do so
* The processing is in our legitimate interests and it's not overridden by your rights
* To comply with the law

**Data processed for contractual purposes**

We collect and process your personal data if you purchase from us or supply us with certain products or services and we need your data for that purpose. Your personal data will be collected, stored, and if necessary passed on, in order to provide the contractual services. Failure to provide this information may result in being unable to fulfill the contract.

If we deliver goods to you we may pass your data on to select logistics companies for the purposes of completing the transaction.

Your payment details may be transmitted to the appropriate payment service provider, depending on the payment method you have selected. The payment service provider bears the responsibility for your payment data.

**Data processed for legal reasons**

We are subject to various legal obligations (e.g., commercial and tax laws). Processing of personal data may be necessary to fulfill tax and/or reporting obligations.

We do reserve the right to disclose personal information to authorities when we believe that doing so is reasonably necessary to comply with the law or law enforcement, to prevent fraud or abuse, or to protect Sunnen’s legal rights, property, or the safety of Sunnen, its employees, users, or others.

**Data processed due to legitimate interest**

Legitimate interest is a technical term in data protection law which essentially means Sunnen has a good and fair reason to use your data and we do so in ways which do not hurt your interests and rights. We sometimes require your data to pursue our legitimate interests in a way that might reasonably be expected as part of running our business and that does not materially impact your rights, freedom or interests.

For example, we use identity, device, and location information to prevent fraud and abuse and to keep the Services secure. We may also send you promotional communications about our Services, subject to your right to control whether we do so.

We analyze how users interact with our sites so we can understand better what elements of the site’s design are working well and which are not working well. This allows us to improve and develop the quality of the online experience we offer to all our users.

## Retention of Data

Sunnen Products Company will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Sunnen Products Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

## Transfer of Data

Some data may be passed on, under strict contractual and legal requirements, to external service providers for processing. Sunnen remains responsible for the protection of your data in addition to the processor.

Sunnen may transfer your personal data to other Sunnen affiliates for the purpose of carrying out the business relationship with you or preserving our legitimate interests.

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction. If you are located outside United States and choose to provide information to us, please note that we may transfer the data, including Personal Data, to the United States and process it there.

Sunnen Products Company will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

## Disclosure of Data

### Disclosure for Law Enforcement

Under certain circumstances, Sunnen Products Company may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

### Legal Requirements

Sunnen Products Company may disclose your Personal Data in the good faith belief that such action is necessary to:

* To comply with a legal obligation
* To protect and defend the rights or property of Sunnen Products Company
* To prevent or investigate possible wrongdoing in connection with the Service
* To protect the personal safety of users of the Service or the public
* To protect against legal liability

## Security Of Data

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

## Your Data Protection Rights Under General Data Protection Regulation (GDPR)

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. Sunnen Products Company aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

**The right to access, update or to delete the information we have on you.** Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.

**The right of rectification.** You have the right to have your information rectified if that information is inaccurate or incomplete.

**The right to object.** You have the right to object to our processing of your Personal Data.

**The right of restriction.** You have the right to request that we restrict the processing of your personal information.

**The right to data portability.** You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.

**The right to withdraw consent.** You also have the right to withdraw your consent at any time where Sunnen Products Company relied on your consent to process your personal information. You can send an email to privacy@sunnen.eu. Processing based on your consent is lawful until the time of the withdrawal. Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

**Processing based on legitimate interest**
If necessary, we process your data beyond the actual fulfillment of the contract for the protection of our legitimate interests or of third parties. Examples:

Consultation of and data exchange with credit bureaus for the determination of credit worthiness and default risks (Article 6 Abs. 1f of GDPR);

* Review and optimization of needs analysis and direct customer approach procedures;
* Advertising or market and opinion research, provided that you have not objected to the use of your data;
* For asserting legal claims and defense in legal disputes;
* Efficient central data processing within SUNNEN;
* When ensuring IT security and IT operations;
* As measures for business control and further development of services and products.

**Data processed based on Consent**

If you have given us consent to the processing of personal data for specific purposes, this consent can be revoked at any time.

## Service Providers

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

### Analytics

We may use third-party Service Providers to monitor and analyze the use of our Service.

**Google Analytics**

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. The information generated by the cookie about your use of this website is usually transmitted to a Google server in the USA and stored there. However, if you enable IP anonymization on this website, your IP address will be shortened by Google beforehand within member states of the European Union or in other contracting states of the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be sent to a Google server in the US and shortened there.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity.

For more information about Google’s Terms of Use and Privacy, please visit <http://www.google.com/analytics/terms/de.html> or <https://www.google.de/intl/en/policies/>. Please note that on this website Google Analytics has been extended to include the code "anonymizeIp" in order to ensure the anonymized collection of IP addresses (so-called IP-Masking).

### Behavioral Remarketing

Sunnen Products Company may use remarketing services (e.g., Google AdWords) to advertise on third party websites to you after you have visited one of our websites. We and our third-party vendors use cookies to inform, optimize and serve ads based on your past visits to our websites.

## Links to Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

## Children's Privacy

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Children has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from anyone under the age of 18 without verification of parental consent, we take steps to remove that information from our servers.

## Changes to this Privacy Policy

This Privacy Policy is current and dated from May 25th, 2018. We reserve the right, at any time, to change the privacy policy, in particular to adapt to the evolution of our Websites or the implementation of new technologies.

We will let you know via a prominent notice on our website and/or an email, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## Contact Us

If you have any questions about this Privacy Policy, please contact us:

For inquiries outside of the European Economic Area (EEA)

* By email: privacy@sunnen.com
* By visiting this page on our website: http://www.sunnen.com/privacy-inquiries
* By mail: 7910 Manchester Rd

St. Louis, MO 63143

For inquiries inside of the European Economic Area (EEA)

* By email: privacy@sunnen.eu
* By visiting this page on our website: http://www.sunnen.eu/privacy-inquiries
* By mail: SUNNEN AG
GDPR / DSVGO
Fabrikstrasse 1
CH – 8586 Ennetaach

## Definitions

**Data Controller**

Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed.

For the purpose of this Privacy Policy, we are a Data Controller of your Personal Data.

**Data Processors (or Service Providers)**

Data Processor (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller.

We may use the services of various Service Providers in order to process your data more effectively.

**Data Subject (or User)**

Data Subject is any living individual who is using our Service and is the subject of Personal Data.