Privacy Policy for Ironhead Tire USA

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This Privacy Policy describes how Sailun Tire (USA) Corp. ("**we**", "**us**", "**Company**", or "**Ironhead**") collect, use, and disclose Personal Information of users ("**you**"), your rights and choices, and other important information about how we handle your Personal Information.

If you have additional questions or require more information about our Privacy Policy, do not hesitate to contact us using the contact information below.

This Privacy Policy applies to your use of our "**Services**" which includes the following:

- Our online services such as through our website ironheadtireusa.com (collectively, the "**Website**"), and other online services.
- Our offline services, such as phone calls and any other in-person interactions

Acknowledgment

By using our Website, you hereby acknowledge the collection, use, and disclosure of your Personal Information in accordance with this Privacy Policy.

Contact Us

If you have any questions or suggestions about our Privacy Policy, do not hesitate to contact us at privacy@ironheadtireusa.com.

Information We Collect

The following describes how we process information relating to identified or identifiable individuals and households ("**Personal Information**").

Categories of Personal Information

The categories of Personal Information we process may include:

Contact Data-Identity Data we can use to contact you, such as email and physical addresses, phone numbers, or communications platform usernames/handles.

Device / Network Data-Browsing history, search history, and information regarding your interaction with a website or application (e.g. IP Address, MAC Address, SSIDs, session navigation history and similar browsing metadata, and other data generated through applications and browsers, including cookies and similar technologies or other device identifiers or persistent identifiers), online user ID, device characteristics (such as browser/OS version), web server logs, application logs, first party cookies, third party cookies, web beacons, clear gifs and pixel tags.

General Location Data- Non-precise location data, such as location information derived from device information or IP addresses.

Identity Data-Information such as your name; company name; address; email address; telephone number; gender, account login details, e.g. username and password, or other account handles/usernames.

Transaction Data-Information about the Services we provide to you and about transactions you make with us and similar information.

User Content-Unstructured/free-form data that may include any category of Personal Information, e.g. the contents of the message and/or attachments you may send us, and any other information you may choose to provide.

Sources of Personal Information

We collect Personal Information from various sources, including:

Directly from you- We may collect Personal Information if you contact us directly, complete a transaction via our Services, or otherwise use our Services.

Automatic collection- We may receive and store certain Personal Information about you and your device(s) automatically when you access or use the Website.

Service Providers-We receive Personal Information from service providers performing services on our behalf.

Data Processing Contexts / Notice at Collection

Account Registration

We may process certain Personal Information that you provide when you use the Website to create an account. When you register for an account, we may collect Identity Data and Contact Data including items such as name, company name, address, email address, and telephone number. We use this Personal Information to create and maintain your account, to provide the products and services you request, and for our Business Purposes (described below).

Purchase and Transactions

We process Transaction Data, Identity Data, Payment Data, Device/Network Data, and Contact Data when you complete request or submit orders through our Services. We process this Personal information as necessary to perform or initiate a transaction with you, process your order or request, document transactions, and for our Business Purposes.

Visiting the Website

Generally

We process Device/Network Data, Contact Data, Identity Data, and General Location Data. You may also be able to register for an account, complete a purchase, or enroll in marketing communications through our Website. We use this Personal Information as necessary to operate our Website, such as keeping you logged in, delivering pages, etc., for our Business Purposes, and our other legitimate interests, such as:

- ensuring the security of our websites, mobile applications and other technology systems; and
- analyzing the use of our Websites, including navigation patterns, clicks, etc. to help understand and make improvements to the Website.

Log Files

We process Identity Data and Device/Network Data, which may include Log Files. We follow a standard procedure of using log files. These files log visitors when they visit Website. All hosting companies do this and a part of hosting services' analytics. The Personal Information collected by log files include internet protocol (IP) addresses, browser type, Internet Service Provider (ISP), date and time stamp, referring/exit pages, and possibly the number of clicks.

We use this Personal Information for analyzing trends, administering the site, tracking users' movement on the website, and gathering general information regarding the sources and nature of traffic or devices accessing our Websites.

Cookies, Web Beacons and Other Technologies

We process Identity Data, Device/Network Data, Contact Data, and General Location Data, in connection with our use of cookies and similar technologies on our Website. We may collect this Personal Information

automatically.

We and third parties, including our partners, affiliates, and services providers, may use cookies, JavaScript, or Web Beacons, and similar tracking technologies to track the activity on the Website and store certain information for the following purposes:

- for "essential" purposes necessary for our Websites to operate (such as maintaining user sessions, content delivery, and the like);
- for "functional" purposes, such as to enable certain features of our Websites (for example, to allow a customer to maintain an online shopping cart); and
- for "analytics" purposes and to improve our Websites, such as to analyze the traffic to and on our Websites (for example, we can count how many people have looked at a specific page, or see how visitors move around the Website when they use it, to distinguish unique visits/visitors to our Websites, and what website they visited prior to visiting our Website, and use this information to understand user behaviors and improve the design and functionality of the Website).

We may also process this Personal Information for our Business Purposes. See the your "Rights and Choices" section below for information regarding opt-out rights for cookies and similar technologies.

Please note: Third parties may view, edit, or set their own cookies or place web beacons on our Websites. We, or third party providers, may be able to use these technologies to identify you across platforms, devices, sites, and services.

You can choose to disable cookies through your individual browser options. If you choose to disable cookies you may not be able to fully experience the interactive features of the Website. For more information on cookies and how to disable cookies visit https://youradchoices.ca/en/tools.

Marketing Communications

We process Device/Network Data, Contact Data, and Identity Data in connection with marketing emails or similar communications, and when you open or interact with those communications. You may receive marketing communications if you consent and, in some jurisdictions, as a result of account registration or a purchase.

We process this Personal Information to contact you about relevant products or services and for our Business Purposes. Marketing communications may also be personalized as permitted by applicable law. See your Rights & Choices section below to limit or opt out of this processing, if provided under applicable law.

Contests and Promotions

We may collect and process Identity Data, Contact Data, and User Content when you enter a contest/sweepstakes or take part in a similar promotion. We process this Personal Data as necessary to provide the contest/promotion, notify you if you have won, or to process delivery of a prize, for our Business Purposes, and other legitimate interests, such as verifying your identity for authentication, anti-fraud, and security purposes.

Note: Some programs and offers may be operated/controlled by third-party service providers. We may receive this data from third parties to the extent allowed by the applicable partner; otherwise, this Privacy Policy will not apply to data processed by third parties.

Your Personal Data may be public. If you win a contest/sweepstakes, we may publicly post some of your data. We do not post Personal Information without consent where required by law. See any program agreement(s) for additional details and terms.

Contact us; support

We collect and process Identity Data, Contact Data, and User Content when you contact us for support. We process this Personal Information to respond to your request, and communicate with you, as appropriate,

and for our Business Purposes. If you consent or if permitted by law, we may use Identity Data and Contact Data to send you marketing communications.

How We Use Your Information

Business Purposes

We use your Personal Information for the purposes for which it was collected, as well as other purposes for which you have given consent, or as otherwise required or permitted by law. This includes, but is not limited to, the following purposes ("**Business Purposes**"):

- Provide, operate, and maintain our Website. For example, we process Personal Information to authenticate users and their rights to access the Services, as otherwise necessary to fulfill our contractual obligations to you, provide you with the information, features, and services you request, and create relevant documentation.
- Improve, personalize, and expand our Website, including in connection with our legitimate interests in improving the design of our Services, understanding how our Services are used or function, for customer service purposes, for internal research, technical or feature development, to track service use, QA and debugging, audits, and similar purposes.
- Understand and analyze how you use our Services.
- Develop new products, services, features, and functionality.
- Communicate with you, either directly or through one of our partners, including for customer service, to provide you with updates and other information relating to the Website, and for marketing and promotional purposes
- Find and prevent fraud, security, and incident detection, including our legitimate interest in ensuring that our Services, are secure, identify and prevent crime, prevent fraud, and verify or authenticate users/individuals. Similarly, we process Personal Information on our Services as necessary to detect security incidents, protect against, and respond to malicious, deceptive, fraudulent, or illegal activity. We may analyze network traffic, device patterns, and characteristics, maintain and analyze logs and process similar Personal Information in connection with our information security activities.
- Compliance, health, safety, and public interest, such as where you exercise your rights under data protection law, for the establishment and defense of legal claims, where we must comply with requests from government or law enforcement officials, and as may be required to meet national security or law enforcement requirements or prevent illegal activity. We may also process data to protect the vital interests of individuals, or on certain public interest grounds, each to the extent required or permitted under applicable law.
- Inform you regarding changes to our Terms of Use or Privacy Policy.

Disclosure of Personal Information

We may share your Personal Information in the following situations, as well as other purposes for which you have given consent, or as otherwise required or permitted by law. This includes, but is not limited to, the following purposes:

- **With our Service Providers:** We may send your Personal Information to our service providers, suppliers, business partners, and legal and financial representatives who help us provide services to you and to help us complete the purposes identified in this Privacy Policy. All such third parties are made aware of the confidential nature of your personal information. Your Personal Information will

be shared with these parties on a "need to know" basis only and we limit the information shared to what is needed for the specific task being performed or fulfilled.

- **With Affiliates**: In order to streamline certain business operations and develop products and services that better meet the interests and needs of our customers, we may share your Personal Information with any of our current or future affiliated entities, subsidiaries, and parent companies.
- **For Business Transfers:** We may share or transfer your Personal Information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of our business to another company. We only provide as much information as is needed for the purposes of the transaction. If we sell our organization or merge with another party, you hereby consent to the transfer of your personal information and all information you provide to us, to our successor for the same purposes as set out in this Privacy Policy.
- **As Required by Law:** Under certain circumstances, we (or our service providers) may be required to disclose your Personal Information if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).
- **To Maintain Security:** We may share your Personal Information when we believe that it is necessary to protect our or others' rights, property, or safety; to investigate possible wrongdoing in connection with the Services; or to protect against legal liability.

Safeguards and Retention

Data Security

We have implemented and maintain reasonable and appropriate security measures, procedures and practices to protect against the loss and unauthorized access, use, modification, destruction or disclosure of your Personal Information while it is in our custody or under our control.

The safety and security of your Personal Information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of the Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of Personal Information via the internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to the Website or over any public network. Any transmission of Personal Information is at your own risk. Without prejudice to any mandatory legal obligations to which we may be subject, we are not responsible for circumvention of any privacy settings or security measures on the Website.

Retention and Storage

We retain your Personal Information for only as long as is needed to fulfill the purposes for which it was collected, or for as long as necessary to comply with applicable laws, whichever is longer. Personal Information that is no longer required is destroyed, erased, or anonymized. We generally consider the following factors when we determine how long to retain Personal Information (without limitation):

- Retention periods established under applicable law;
- Industry best practices;
- Whether the purpose of processing is reasonably likely to justify further processing;
- Risks to individual privacy in continued processing;
- Applicable data protection impact assessments;
- IT systems design considerations/limitations; and
- The costs associated continued processing, retention, and deletion.

We will review retention periods periodically and may pseudonymize or anonymize data held for longer

periods. Your consent to our collection, use and disclosure of your Personal Information for such purposes remains valid after the termination of our relationship with you.

International Transfers

Please note that your Personal Information may be accessed, transferred, disclosed, stored and processed in Canada, the United States, and any other country where the we or our affiliates, service providers, supplier, representatives, or agents are located or where their cloud computing infrastructures may be hosted. The data protection laws in these jurisdictions may differ from those in your jurisdiction.

Third-Party Links

The Website may contain links to other website operated by third parties. Please note that this Privacy Policy applies only to the Personal Information that we collect or receive from third parties with your consent and we cannot be responsible for Personal Information that third parties may collect, disclose, store and use, including through their website. You should always read the privacy policy of each website you visit carefully.

In addition, when you provide Personal Information to us through a third-party website or platform, the Personal Information may also be collected by the third-party website and may be subject to their privacy policy.

Children's Privacy

We encourage parents and guardians to observe, participate in, and/or monitor and guide their children's online activities. If you are under 13 years old, do not:

- use or provide any personal information on our Website;
- register for an account on our Website, or
- provide any Personal Information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use.

We do not knowingly collect any Personal Information from children under the age of 13. If you think that a child under age 13 has provided this kind of information on our Website, please contact us immediately using the contact information above. If we learn we have collected or received Personal Information from a child under 13 years old without verification of parental consent, we will delete that information.

Your Rights & Choices

Your Rights

Applicable law may grant you rights in your Personal Information. These rights vary based on your location, state/country of residence, and may be limited by or subject to our own rights in your Personal Information. Please see the "Regional Supplement" section below for more information regarding your rights and choices in specific regions. You may contact us at contact us at privacy@ironheadtireusa.com to submit requests to exercise rights you may have under applicable law.

Note: We are able to fulfill rights requests regarding Personal Information that we control or process. We may not have access to or control over Personal Information controlled by third parties. Please contact the third party directly to exercise your rights in third party-controlled information.

Verification of Rights Requests

In order to protect your privacy and security and reduce fraud, we will take steps to verify your identity before responding to a rights request, granting access, or making any changes to the Personal Information that we maintain. For example, we may require that you verify that you have access to the email on file in order to verify your identity. If an agent is submitting the request on your behalf, we reserve the right to validate the

agent's authority to act on your behalf.

Your Choices

Access and Correction

We make commercially reasonable efforts to keep your Personal Information complete, up-to-date and accurate. Should you wish to access, update, correct or delete your Personal Information, or express any concerns regarding our use of your Personal Information, please contact us using the contact information above. We ask that you provide us with the name, address and email address that you previously provided to us, a brief description of under what circumstances you provided your personal information to us, and the purpose of your request. If you are unsure as to whether we are holding any Personal Information that belongs to you, you may also contact us for confirmation. We will make reasonable efforts to respond to your request as soon as practicable, or in any event, in compliance with applicable laws.

Withdrawal of Consent

You may, at any time, withdraw your consent to our collection, use and disclosure of your Personal Information, subject to reasonable notice and any legal or contractual restrictions. Should you choose to withdraw your consent, we may be unable to provide, or continue to provide, services that can only be provided if we receive appropriate and required personal information.

Marketing Communications

You can withdraw your consent to receive marketing communications by clicking on the unsubscribe link in an email (for email), by responding with "OPT-OUT," STOP, or other supported unsubscribe message (for SMS), by adjusting the push message settings for our mobile apps using your device operating system (for push notifications), or for other communications, by contacting us using the information below. To opt-out of the collection of information relating to email opens, configure your email so that it does not load images in our emails.

Cookies, Similar Technologies

If you do not want information collected through the use of cookies and similar technologies, you can manage/deny cookies and certain similar technologies using your browser's settings menu. To opt-out of Google's analytic and marketing services, visit Google Analytics Terms of Use, the Google Privacy Policy, or Google Analytics Opt-Out. If you would like to modify your settings with regard to cookies and similar technologies, you may use our cookie consent tool, accessible on our Website. You must opt out of the use of some third party cookies directly via the third party.

Do Not Track

Our Website does not respond to your browser's do not track signal.

Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We encourage you to review this page periodically for any changes. Each time this Privacy Policy is amended, the "Last Updated" date at the beginning of the Privacy Policy will be revised. If we make material changes to how we treat our users' personal information, a notice will be posted to the Website advising of those changes.

Any changes that are made to this Privacy Policy will apply to both any personal information that we hold prior to the date of the amended Privacy Policy and any personal information that we collect on or after such date.

Regional Supplement - US

US State & California Privacy Rights & Choices

Under the California Consumer Privacy Act ("**CCPA**") and other state privacy laws, residents of California and

other US states may have the following rights, subject to regional requirements, exceptions, and limitations.

Confirm- Right to confirm whether we process your Personal Information.

Access/Know- Right to request any of following: (1) the categories of Personal Information we have collected, sold/shared, or disclosed for a commercial purpose; (2) the categories of sources from which your Personal Information was collected; (3) the purposes for which we collected or sold/shared your Personal Information; (4) the categories of third parties to whom we have sold/shared your Personal Information, or disclosed it for a business purpose; and (5) the specific pieces of Personal Information we have collected about you.

Portability- Right to request that we provide certain Personal Information in a common, portable format.

Deletion- Right to delete certain Personal Information about you that we have collected.

Correction- Right to correct certain Personal Information that we hold about you.

Opt-Out (Sales, Sharing, Targeted Advertising, Profiling)- Right to opt-out of the following:

- If we engage in sales of data (as defined by applicable law), you may direct us to stop selling Personal Information.
- If we engage in Targeted Advertising (aka "sharing" of Personal Information or cross-context behavioral advertising,) you may opt-out of such processing.
- If we engage in certain forms of "profiling" (e.g. profiling that has legal or similarly significant effects), you may opt-out of such processing.

Non-Discrimination- California residents have the right to not to receive discriminatory treatment as a result of your exercise of rights conferred by the CCPA.

List of Direct Marketers- California residents may request a list of Personal Information we have disclosed about you to third parties for direct marketing purposes during the preceding calendar year.

Submission of Requests

You may submit request to us at privacy@ironheadtireusa.com as follows (please our review verification requirements section). If you have any questions or wish to appeal any refusal to take action in response to a rights request, contact us at privacy@ironheadtireusa.com. We will respond to any request to appeal within the period required by law.

Categories of Personal information Disclosed for Business Purposes

For purposes of the CCPA, we have disclosed to Service Providers for "business purposes" in the preceding 12 months the following categories of Personal information, to the following categories of recipients:

Category of Personal information	Category of Recipients
Contact Data	Service Providers; Affiliates; Business Transfers; As Required by Law
Device/Network Data	
General Location Data	
Identity Data	
Transaction Data	
User Content	

Categories of Personal information Sold, Shared, or Disclosed for Commercial Purposes

None.

Categories of Sensitive Personal information Used or Disclosed

None.