



Alpha Tubular Motors LLC PRIVACY POLICY

Last Updated: June 23, 2022

This Privacy Policy (this “**Policy**”) describes the practices of Alpha Tubular Motors LLC’s (“**Alpha**”) in collecting, using, maintaining, disclosing, and otherwise processing (collectively, “**Processing**”) the information that we collect from you, as well as how we protect and secure your data. If you have additional questions regarding your rights under this Policy or any agreement you may have with Alpha regarding your data, please contact us at sales@alphamotors.us.

Please read this Policy carefully to understand our Processing of your information and how we will treat it. This Policy is incorporated into and supplemental to Alpha’s Terms & Conditions and any written agreements you may have with Alpha, including but not limited to any purchase order.

This Policy generally applies to the information that Alpha Processes. However, this Policy is subordinate to any specific terms and conditions set forth in any terms of use, end user license agreements, or other agreements you may have with Alpha relating to a particular product, service, or data. Further, this Policy applies only to information Alpha Processes. It does not apply to information collected by Alpha’s business partners, which may have their own privacy policies that apply to you.

1. What information does Alpha collect?

The information Alpha may collect can be described as Personal Information and Non-Personal Information. Alpha may collect this information when you provide it to us or when you use our products or services.

“Personal Information” is information that can be used to identify, locate, or contact you, an individual person, as well as any other information about you that we may connect with Personal Information. For example, Personal Information that we may collect includes:

- Contact information such as your name, phone number, physical address, email address, username, and password;
- Relationship information such as your preferences or potential interest in Alpha products and services;
- Transactional information such as purchases, services requested, customer service inquiries, and other customer account information; and

- Financial information such as credit card, banking, or financing information.

“Non-Personal Information,” on the other hand, is information that does not identify you as an individual person and is not identifiable to you as an individual person. For example, Non-Personal Information that we collect includes:

- Cookies and other similar tracking technologies used in a non-identifiable way;
- Information we anonymize by rendering it unidentifiable to an individual person;
- Information we aggregate by combining it with other data in such a way that no individual person can be identified or linked to any specific information; and
- The name, form, contact details, transaction history, or financial information of individual persons or business entities such as corporations, limited liability companies, and non-profit organizations.

2. Why does Alpha collect this information?

Alpha may collect and otherwise Process Personal Information for a variety of purposes, depending on the information being Processed. In particular, Alpha may Process this information to perform under its contractual obligations to you and provide the products and services you have purchased, Processing information as may be necessary to support you in using our products and services. Alpha may also Processes information given its legitimate interest in improving its products and services, enhancing customer experience, and identifying and marketing certain products and services to you. Alpha may also Process information as necessary to comply with a legal obligation.

To summarize, Alpha may Processes Personal Information for the following purposes:

- To fulfill orders for Alpha products and services;
- To operate, deliver, maintain, or otherwise provide the Alpha products and services you request;
- To support Alpha products and services;
- To set up and maintain any customer account and allow you to interact with Alpha online;
- To provide you with customer service by resolving disputes, addressing complaints, and troubleshooting any technical problems encountered;
- To measure and understand the effectiveness of Alpha products and services;
- To improve Alpha products and services;
- To comply with applicable laws and regulations; and

- To communicate offers for products and services, including offers based on your interests and usage of Alpha products and services, administer promotional events, and engage in other marketing activities that may be of interest to you. We will provide you the opportunity to opt-out of marketing information or market research inquiries, but we may still need to gather certain information to provide our products and services to you.

If we collect or Process your Personal Information for any other purposes, we will disclose it to you at the time it is collected.

With respect to Non-Personal Information, because this information does not identify an individual person, Alpha may use and Process it for any purpose. For example, Alpha may Process such information for use in its products and services. Alpha expressly reserves the right to use anonymized or aggregated information to improve or develop its products and services, create and publish reports, conduct statistical analyses about customers and equipment, monitor industry trends, and otherwise engage in activities that do not result in the disclosure of identifiable information.

To be clear, Alpha is committed to respecting its customer's privacy and will only Process your Personal Information for the reasons disclosed herein, and then only in the context of your customer relationship with Alpha. Alpha will not sell, rent, or lease your Personal Information to others.

3. Will Alpha share this information with third parties?

To provide certain products and services, Alpha may share information with third parties who provide services to us, such as the manufacturers, distributors, and operators involved in providing our products and services.

In the event we share Personal Information with any third party, we will maintain adequate controls and oversight, including contractual obligations where appropriate, to ensure that any third party whom we engage to assist us in Processing Personal Information will only have access to the Personal Information necessary for it to perform specific, designated tasks on our behalf, will only use the information for this purpose, and will protect your Personal Information to at least the same extent that we do. Please note, however, that this Policy applies only to information that we Process and share with others—it does not apply to Personal Information that you share with others.

Alpha may share information to comply with our legal obligations, such as to respond to lawful requests and legal processes. In the event we are asked to disclose your Personal Information, we will attempt to validate the request and inform you of it.

Alpha may disclose information where needed to affect the sale or transfer of its assets, enforce its rights, protect its property, or protect the rights, property, or safety of others, or as needed to support external auditing, compliance, and corporate governance functions.

If Alpha needs to share your information for a purpose not identified here, we will obtain your consent and disclose this purpose at the time of obtaining your consent. For example, Alpha may

wish to use your information in demonstrations or other marketing materials and will contact you before doing so.

4. How long will Alpha keep my information?

Alpha keeps different kinds of information for different lengths of time, depending on the purpose for which it was Processed and your specific situation. Thus, Alpha will retain information as long as necessary to accomplish the relevant purpose, but no longer.

5. How does Alpha keep my information secure?

Taking into account the nature of the information gathered, Alpha maintains administrative, technical, and physical controls that are designed to safeguard Personal Information.

6. What are my choices with respect to my information?

Your first choice is always to limit the information you provide. You may also opt-out of certain marketing information by visiting our website and communicating your choices to us, or by clicking “unsubscribe” at the bottom of marketing emails you might receive.

Regarding cookies and other tracking technologies, you can manage these by adjusting the settings on your browser, commonly referred to as the browser’s “Do Not Track” settings. All browsers are different, so you may need to visit the “Help” section of your browser to learn more about cookie preferences and other privacy settings that may be available. You can also manage how your mobile device and mobile browser share location information with Alpha, as well as how your mobile browser handles cookies and related technologies by adjusting your mobile device privacy and security settings. Please refer to instructions provided by your mobile service provider or the manufacturer of your device to learn more. In general, Alpha will comply with your browser’s “Do Not Track” settings.

Alpha complies with applicable law regarding your ability to access, correct, and delete your identifiable information. If you have an online account, you may be able to log into your account to access and update certain information provided. For identifiable information that is not linked to an online account, please contact us directly.

Subject to the specific terms of your agreement, you may be able to opt-out of sharing information with Alpha. If you choose to do so, you may no longer have access to certain data and may not be able to use certain products or services. Alpha retains the right to maintain any information already Processed.

Alpha does not intend to collect Personal Information from children aged 16 and under. If you believe a child is providing us Personal Information, please contact us directly so we may investigate and delete it.

For assistance with exercising your personal information choices, or if you have any questions about these choices, please contact us at sales@alphamotors.us.

7. For EU residents:

The General Data Protection Regulation (“**GDPR**”), particularly Articles 15 to 21, affords you a number of rights. We encourage you to read and learn about those rights on your own, but the following will help you generally understand those rights.

- a. **Access:** This allows you to request from us information about your Personal Information, including what data we have and how and why it is being Processed.
- b. **Rectification:** In the event that some or all of the Personal Information that we have concerning you is inaccurate, this gives you the right to have those inaccuracies rectified.
- c. **Erasure:** In some cases, you may have the right to request that we erase your Personal Information in our possession.
- d. **Restriction of Processing:** This gives you the right, in some circumstances, to have us Process your Personal Information only with your consent.
- e. **Objection to Processing:** Where we are Processing your Personal Information on the grounds of our legitimate interests, or to carry out tasks in the public interest or to exercise official authority, you have a right to object to the Processing on grounds relating to your particular situation. In cases where you object to our Processing of your Personal Information for direct marketing purposes, the Processing will cease.
- f. **Data Portability:** This allows you to request a copy of your Personal Information on file and to transfer that information to someone else without any interference from us. In some cases, you may be able to request that we transfer your Personal Information directly to a third party on your behalf.

In addition, to the extent that we Process any of your Personal Information on the basis of your consent, you have the right to withdraw that consent at any time, without affecting the lawfulness of Processing that was based on your consent before its withdrawal.

If you are an individual person residing in the EU and at any time you believe we have violated one of your rights listed above, or if you believe we are in violation of one or more of the provisions of the GDPR, you have the right to lodge a complaint with a Data Protection Authority. More information about the Data Protection Authorities can be found at https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-are-data-protection-authorities-dpas_en.

8. For California residents:

This notice does not apply to employment-related personal information collected from California-based employees, job applicants, contractors, or similar individuals.

The California Consumer Privacy Act (the “**CCPA**”) affords those who reside in the State of California certain rights. If you are a resident of the State of California, we encourage you to read

and learn about those rights on your own, but the following will help you generally understand those rights:

- **Access:** You have the right to request that we disclose certain information to you about our collection and use of your Personal Information.
- **Erasure:** In some cases, you may have the right to request that we erase your Personal Information in our possession.
- **Data Portability:** This allows you to request a copy of your Personal Information that we may have and transfer that information to someone else without any interference from us. In some cases, you may be able to request that we transfer your Personal Information directly to a third party on your behalf.
- The CCPA further provides California residents the right to direct us not to sell your Personal Information. We do not sell your Personal Information.

We will not discriminate against you for exercising any of your CCPA rights.

In addition, California’s “Shine the Light” law permits you to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes.

To make a request regarding any of these rights or to ask questions or provide comments about this Privacy Notice for California Residents, please contact us at sales@alphamotors.us.

9. For international residents:

Alpha is headquartered in the United States of America and Australia. It and its authorized processors may transfer your information to and access it from the United States of America and Australia for the purposes described in this Policy. Alpha protects the privacy and security of Personal Information in the manner described in this Policy regardless of where it is collected, stored, accessed, or otherwise Processed.

10. Does this Policy ever change?

Alpha may post changes to this Policy on this page. Please refer to the “updated” date above. We may or may not contact you directly concerning significant changes, and therefore we encourage you to visit this page periodically and check for changes. By using Alpha products and services after a change to this Policy, you are deemed to consent to any changes.

11. How do I contact Alpha?

For questions about this Policy or to exercise any of the rights or choices we have described in this Policy, please contact sales@alphamotors.us.