Flick It Safely® Privacy Policy

1. Privacy Statement.

BIC is committed to protecting your online privacy when visiting our FlickitSafely.com website (the "Site"). The purpose of this policy is to inform you about the types of information we gather about you when you visit the Site, how we use that information, whether we disclose it to anyone, and the choices you have regarding our use of the information.

The Site does not require personal information from visitors in order to gain access to any part of our Site. With the exception of IP addresses and cookies, no personal information is automatically collected from visitors to the Site.

You may at any time withdraw or change your consent to our use or disclosure of your personal information, or request that we to delete it from BIC's files, subject to legal and contractual restrictions. However, if you do not provide personal information required for us to supply you with a service offered on the Site, (for example, our e-mail newsletters) we may not be able to provide that service to you.

BIC does not use the Site to knowingly solicit personal information from or to market to persons under the age of majority.

For California residents, <u>see below</u> regarding your rights under the California Consumer Privacy Act of 2018.

2. Categories of Personal Information Which We Collect and How We Use It

When visiting the Site, we may collect information from you, including your use of the Site, and the computer used by you to access the Site. If you e-mail us for information, we may ask you to voluntarily provide us with personal information including your name, e-mail address and mailing address including province or territory of residence if you reside in Canada, so that we may contact you to respond to your comments, questions, or requests for information. Aside from a reply to an e-mail received by us, it is not our intent to contact you unless you request particular information or opt-in to receive future information as described below.

If you contact us via our CONTACT US link on the Site, you may be asked to voluntarily provide personal information including your first name and e-mail address so that BIC or an agency working on BIC's behalf, may contact you to respond to your comments, questions or requests for information by you. Aside from a reply to an e-mail received by us, it is not our intent to contact you unless you request particular information. Although we will retain your contact information in our database, we will use it only to respond to your requests.

We may use Google Analytics or other third party analytic tools to analyze user behavior which allows us to measure consumer interest in the various areas of our Site for product and Site development purposes. These third party analytic tools tell us aggregate and collected

information such as, how the Site was accessed and how long visitors stayed. This information is used for our own internal purposes to improve the content of this Site, to enhance users' experience when visiting our Site, and to customize the content and/or layout of our pages. All information of user behavior described herein will be recorded on a group basis, and such analysis may be shared with our Site development consultants. This information is aggregated and not personally identifiable. To learn more about Google Analytics and how it uses your data, please visit http://www.google.com/analytics/learn/privacy.html.

3. Links to or From Other Web Sites

The Site and social media applications may contain links to other websites. BIC has no control over and assumes no responsibility or liability for the privacy practices of these websites. You should review the privacy policies of each website you visit. We may offer links to other websites; for example, coupons for BIC may be made available through a link to an agent that specializes in the distribution of on-line coupons. We are not responsible for the content or information collection policies of other websites. If you visit another website, you should review their privacy and other policies.

4. How FlickitSafely.com Uses Cookies

Like many other commercial websites, our Site may utilize a standard technology called a "cookie" to collect information about how our Site is used. Cookies were designed to help a website recognize a user's browser as a previous visitor and thus save and remember any preferences that may have been set while the user was previously browsing the website. Our cookie cannot retrieve any other data from your hard drive or pass on a computer virus. Our Site may use cookies to enhance your visit. Cookies can securely store a user's password, personalize home pages, identify which parts of a website have been visited or keep track of your preferences. Our cookies may collect a domain name and track a path through our Site pages. BIC uses so-called permanent cookies which will be saved on your browser for an extended period of time, unless you delete them sooner, and so-called session cookies which will be deleted when your browser is closed. We only use cookies to gather the information indicated in this policy and do not use cookies to gather personal identifying information about you without your consent. Most browsers include an option to clear existing cookies or reject new ones. If you elect to do this, portions of this Site may not function as intended.

5. Do Not Track.

We do not track your activity on any other website, but ours. We do not participate in activities commonly known as behavioral advertising and we, by default, do not track your activity on any other website. Some browsers have a "do not track" feature that lets you tell websites that you do not want to have your online activities tracked. These features are not yet uniform, and our Site is not currently set up to respond to those signals for tracking on our Site.

6. Disclosure To Third Parties.

Except as specified herein, we do not share personal information about you with any third party without your permission and we do not allow third parties to collect personally identifiable information from users on this Site. This does not include trusted third parties who assist us in operating the Site, conducting our business, including administering promotions, sending newsletters, or serving you, so long as those parties agree to keep this information secure and

confidential. Third party providers maintain the information they need to perform their designated functions and we do not authorize such parties to use or disclose personal information for their own marketing or other purposes. We may also release your personal information when we believe release is permitted by or appropriate to comply with the law (for example, in response to a search warrant or other legally valid inquiry or order, or to an investigative body in the case of a breach of an agreement or contravention of law, or as otherwise required or permitted by applicable U.S., Canadian or other law), to enforce our Site policies, to exercise or a defend legal claims or to protect ours or others rights, property, or safety. However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses. Please note that your personal information may be maintained and processed by service providers located in foreign jurisdictions.

7. Security of Your Personal Information

We have policies and procedures in place to protect your personal information from loss, unauthorized access, modification or disclosure. In addition, we have implemented technological safeguards including security software, passwords and firewalls intended to prevent unauthorized computer access. No claim is made as to the impenetrability of the system under unusual circumstance or its resilience to future attacks.

8. Transfer and Storage of Information.

Your personal information is stored at secure locations and on servers located in the State of Texas, U.S.A. We or our service providers may use servers located in the State of Texas, U.S.A., for back up and emergency storage of this Site, the content of which may include your personal information. Any electronic records generated by us or our service providers during the course of your interactions with the Site may be maintained on those servers. As such, if you are a Canadian Citizen or Resident, your personal information may be disclosed, processed and stored outside Canada, and therefore may be available to government authorities under lawful orders and laws applicable there. You may obtain information and address questions about the privacy policies and practices relating to handling of your personal information outside of Canada by contacting us by the method set out below. We retain your personal information as long as is required for the purposes identified when you provided the personal information and for any new purposes identified and consented to by you, and for an appropriate time thereafter.

9. Collection and Use of Personal Information from Visitors 13 Years of Age or Under. The Site is primarily designed and intended for adults. In accordance with the Children's Online Privacy Protection Act (COPPA), we do not knowingly collect or store any personal information about children under age 13, and the Site is not designed to collect personal information from

children under age 13.

11. Contacting Us Regarding this Privacy Policy or Your Personal Information.

Questions regarding this Privacy Policy, the collection or accuracy of your personal information, the use or disclosure of the information, or about your personal information we have on record or to correct, amend or delete your personal information or any other questions regarding the Site may be directed to:

For inquiries from U.S. Citizens or Residents: FlickitSafely.com Website Privacy Policy

One BIC Way, Suite 1 Shelton, CT 06484-6299 U.S.A.

For inquiries from Canadian Citizens or Residents:

BIC Inc., Attn: Privacy Officer, Consumer Affairs, 155 Oakdale Road, Toronto, ON M3M 1W2. PrivacyOfficer.Toronto@bicworld.com

12. Your California Privacy Rights

The California Consumer Privacy Act (CCPA) provides California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access Request Rights

You have the right to request that BIC disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you.

Sale of Personal Information

BIC does not sell your personal information.

Use of Personal Information

For information on how we use your personal information, see section 2. *Use of Personal Information Which We Collect*, above.

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

Exercising Access and Deletion Rights

To exercise the access and deletion rights described above, please submit a verifiable consumer request to us by either:

• Completing the appropriate webform in the link below:

- o If you contacted us using the Contact Us feature on our website, <u>fill out this</u> webform.
- o If you submitted your email to receive notifications from BIC, <u>fill out this</u> <u>webform</u>.
- Emailing us at PIIRequest@bicworld.com

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or deletion twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. In order to verify your identity, we may request that you provide us with your name, address, email address and/or order number. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

Contact Information

If you have any questions or comments about this notice, our Privacy Statement, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at: PIIRequest@bicworld.com.

This Privacy Policy is subject to change at our discretion. You should periodically check this Site for changes to this Privacy Policy. All changes will be posted as soon as they go into effect.

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