



Purposes and types of personal data Comet America processes

Managing customer relationships; online store operations and the Site

Comet America typically collects and processes personal data of the contact persons of Comet America's customers, the Site visitors and the users of the online store. Personal data is collected directly from the customer's contact person in connection with the customer requesting a quotation or placing an order for Comet America's products or services, from the use of the Site or directly from the customer's contact person through the registration process to the online store.

The personal data collected and processed by Comet America may include:

- Contact details (e.g. name, email address, phone number);
- Other relevant information provided by you when you register to the online store, or order a newsletter or other information asset at the Site;
and
- Information collected of you when you use the Comet America online store (e.g. IP-address, web log data).

Personal data is used for the following purposes:

- Providing the products or services (such as shipping the product or making the service available to the customer), and for managing and developing the customer relationship;
- Marketing activities (such as targeted email marketing and personalizing the Site);
- Developing services and enhancing user experience (such as by optimizing and personalizing the Site).

The grounds for processing of personal data are either fulfilment of an agreement concluded between Comet America and the customer, or the legitimate interest of Comet America which consists of managing quotations and receiving orders, as well as developing and managing the customer relationship, business functions, marketing and communications.

Providing online services

For online services, Comet America collects and processes personal data of users, who may be customer's employees, contractors or other individuals to whom customer has created a user account or otherwise provided access to the service, in accordance with terms and conditions of the respective service. Personal data is collected directly from the administrator of the service when creating user accounts and/or from the user when using the service.

The personal data collected and processed by Comet America may include:

- Contact details (e.g. name, email address, phone number); and
- Information collected of you when you use the online services (e.g. IP-address, web log data).

Personal data is used for the following purposes:

- Creating a user account and granting access to the service;
- Providing the online service and for debugging purposes; and

- Modifying, personalizing and improving the service.

The grounds for processing of personal data is either fulfilment of an agreement concluded between Comet America and the customer, or the legitimate interest of Comet America to provide the service to the users.

Marketing

Comet America may receive and collect personal data (including e.g. name and email) from marketing data bases provided to Comet America by third parties or public sources such as Google, LinkedIn, and different business related organizations and events member and participant lists that have relevance to Comet America's business operations.

Personal data is used for the following purposes:

- Contacting the prospective customers; and
- Marketing activities (such as targeted email marketing).

The grounds for processing of personal data is the legitimate interest of Comet America to promote and market services to potential customers.

Suppliers and business partners

Comet America typically collects and processes personal data of suppliers' and business partners' representatives for the purposes of fulfilment of an agreement concluded between Comet America and the company that the data subject represents.

Personal data is used for the fulfilment of the agreement and managing the relationship between Comet America and the supplier/business partner.

The grounds for processing of personal data is either fulfilment of an agreement between Comet America and the supplier/business partner or the legitimate interest of Comet America in managing the supplier/business partner relationship.

Transfers of personal data

Comet America does not transfer or disclose your personal data to a third party without your permission, except when necessary for processing a request for quotation or fulfilling an order, including without limitation, providing necessary information to relevant finance-related companies, logistics and transport service providers and authorized after-sales service providers, as well as responding to your requests or answering your inquiries, or as necessary for protecting Comet America's, its Site users' and/or the public's rights, property and/or safety.

Comet America may share personal data within the Comet America Group of Companies for the purposes described in this Policy. Such sharing may involve transferring data to and from other countries in which Comet America operates, has business activities or is otherwise present. Comet America may use third party service providers in implementing its marketing campaigns. For the purposes of the implementation of such marketing campaigns, Comet America may transfer personal data to third party service providers.

Additionally, Comet America may share your contact details and online behavior data, such as Site visits, with sales channel partners for the purpose of sales and marketing of Comet America's products and services.

Because Comet America is committed to protecting your privacy, Comet America does not sell or transfer personal data to third parties for their promotional purposes.

Comet America may transfer your information both in and out of the European Union. Such transfers will be carried out in compliance with applicable laws and necessary safeguards, such as EU Commission's standard contractual clauses, adequacy decisions, binding corporate rules, or US Privacy Shield framework, in order to ensure adequate level of protection for personal data.

Protecting personal data

Comet America endeavors to take commercially reasonable technical and organizational measures to prevent unauthorized access to and improper use of your personal data. Comet America maintains an Information Security Management System to secure information, including personal data. Information is considered secured only when its integrity can be maintained, its availability ensured and its confidentiality preserved. Comet America's information security policies and procedures ensure the protection of information from unauthorized viewing, modification, dissemination, or destruction and provide the necessary recovery mechanisms from accidental as well as malicious destruction, alteration or loss. Access to the personal data is limited only to those Comet America's employees, directors, officers, contractors, and service providers who need to process the personal data as a part of their duties.

Retention of personal data

Comet America retains personal data for a reasonable period of time, not exceeding any legal requirements or limitations. Personal data will be deleted in accordance with Comet America's data retention procedures.

Disclosures required by law

If Comet America is compelled by law, court order or other judicial process to disclose any personal data to a court or a third party, Comet America will attempt to give you prior notice using the contact information you have provided. You hereby authorize Comet America to disclose any information collected of you for any of the above-mentioned purposes, including without limitation, disclosing information in connection with an investigation of intellectual property infringements or other activity that is illegal or may expose Comet America to legal liability.

Your rights

You may at any time exercise your right to request access to your personal data and/or right to have incomplete, incorrect, unnecessary or outdated personal data deleted or updated by contacting Comet America. You also have the right to request restriction of, or object to, the processing of your personal data, when applicable. Please note that by requesting Comet America to delete your personal data, Comet America may not be able to provide you or your employer company the products, services or information you have inquired or ordered. You are always entitled to lodge a complaint with a competent data protection authority.

Cookies

The Site can be used for informational purposes without revealing your identity to Comet America and without providing Comet America any personal data.

However, Comet America uses “cookies” in order to recognize a returning visitor as a unique user. Cookies are pieces of data stored on your computer's hard drive, and not on the Site. Cookies themselves do not contain any personal data. By showing how and when our visitors use the Site, Comet America can continue improving them. If you do not wish to receive cookies, or want to be notified when they are placed, you may set your web browser to do so, if your browser permits. If you refuse the cookies, Comet America does not gather any information on your visit, but doing so will require you to re-enter certain information at each visit, or prevent Comet America from customizing the Site's features according to your preferences.

Comet America may link the information stored in the cookies to any personal data you submit through online forms while visiting the Site. Further, Comet America tracks aggregate statistics, such as Internet protocol address, your computer's operating system, your browser type and the address of any referring websites, and general information about the Site's traffic patterns and related information. Comet America collects and processes personal data of the Site visitors to create a personalized Site experience.

Policy changes

Comet America may change this Policy, or change, modify or withdraw access to the Site, or the content of the Site at any time with or without notice. The effective date of this version of this Policy has been posted above for your reference. If Comet America changes this Policy resulting in a material, adverse change in the way Comet America collects or processes your personal data, Comet America will post a notice of such change on the Site.

Contact Details

Your personal data is processed by Comet America, LP a company organized and existing under the laws of State of Minnesota. This Policy is governed by the US law, excluding its choice of law provisions.

You may contact Comet America at any time in order to check personal data collected by Comet America. Comet America can be contacted by sending an email to the following address: info@comet-america.com.

Comet America strives to solve any disagreements through negotiations but needs to point out that you have the right to lodge a complaint with a competent supervisory authority.