## PRIVACY POLICY & TYPES OF PERSONAL INFORMATION TOTOUSAPARTS.COM COLLECTS

#### Right to Know about Personal Information Collected, Disclosed or Sold

<u>Business and Commercial Purposes for which Personal Information is Collected</u>: We collect personal information for our own business purposes, including product sales, internal research, internal operations, auditing, detecting security incidents, improving our services, quality control, and legal compliance as described in the table below.

Categories of Personal Information Collected	<ul> <li>Personal identifiers (e.g., name, alias, postal address, IP address, email address, phone numbers</li> <li>Internet Activity (interest based on web site type, source URL)</li> <li>Geo Location</li> <li>TOTO products owned or used</li> </ul>
Categories of Sources from Which Personal Information May Be Collected	Telephone Companies Surveys and Questionnaires (with appropriate notice) Consumer-Provided Contact Information
Categories of Third Parties with Which Personal Information is Sold	None
Categories of Service Providers with Whom Personal Information is Disclosed for a Business Purpose	Cloud computing and storage vendors; security contractors; consultants; analysis providers; marketing analytics platforms; programmatic advertising marketplaces/platforms; premium social publishers; plumbing manufacturer (TOTO USA); measurement platforms; onboarding partners

Please also note that TOTOUSAparts.com does not collect biometric information from consumers who are not employees affiliated with TOTOUSAparts.com. Lastly, TOTOUSAparts.com does not collect sensory information such as voice, visual, thermal, olfactory, or similar sensory information.

#### **DISCLOSURE AND SALE OF PERSONAL INFORMATION**

During the last year, TOTOUSAparts.com has *not* sold personal information it has collected to anyone.

During the last year, TOTOUSAparts.com has **not** disclosed any personal information to service providers (e.g., cloud computing and storage vendors; security contractors, consultants and analysis providers), for TOTOUSAparts.com's own operational business purposes.

TOTOUSAparts.com does not sell or collect personal information about consumers younger than 18 for the purpose of marketing or advertising directly to the minor.

#### **RIGHT TO DELETE PERSONAL INFORMATION**

Pursuant to the CCPA, California consumers have a right to request deletion of personal information about them that TOTOUSAparts.com has collected or maintained.

To take advantage of your right to delete, you need to submit a request by mail or telephone. Our telephone number is 1-888-232-8916. Our mailing address is:

TOTOUSAparts.com Consumer Care Advocate Attention: CCPA Requests P.O. Box 368 Stillwater, MN 55082-0368

To respond to your right to delete request, the CCPA permits TOTOUSAparts.com to verify your identity. We will do this by matching the personal information you supply us to the personal information we maintain about you. Given the sensitivity of some of the fraud detection and prevention data we have, we need to have a reasonably high degree of certainty you are the person you claim to be. This will require that you satisfactorily answer a series of authentication questions based on data we have about you. This may also require that you submit certain personal information for us to compare and match to data we have about you. If you call or mail us and request deletion of personal information, a TOTOUSAparts.com associate will call you to administer an authentication test in which you will be required to answer certain questions to verify your identity. TOTOUSAparts.com will delete the new information collected as part of the identity verification process as soon as practical after fulfilling your request.

If we are unable to satisfactorily verify your identity, we will either request additional information as permitted by the CCPA or provide a limited response (for example, by providing a report with categories of personal information rather than specific pieces of information). Even assuming a verifiable request, TOTOUSAparts.com will retain certain personal information in our databases as necessary to comply with a legal obligation (including ensuring the deletion request is honored and CCPA record-keeping obligations), detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for the activity. In such cases, TOTOUSAparts.com will retain only the minimum amount of information that does not qualify for a statutory or regulatory exception, and only use the remaining data for the purposes provided by the statutory or regulatory exception.

### **RIGHT TO OPT OUT**

TOTOUSAparts.com offers you the opportunity to opt out of receiving promotional e-mail, calls or mail from TOTOUSAparts.com or TOTO USA about our products and services.

For e-mail, individuals may opt out at any time by using the unsubscribe mechanism within the e-mail or sending us an email which allows individuals to manage their subscription preferences regarding TOTOUSAparts.com and TOTO USA newsletters, e-mail alerts and special offers. **Note:** This mechanism does not allow a user to opt out of receiving transactional e-mail, such as product purchases, registration confirmation, product updates and responses to direct requests.

To opt out of calls or direct mail or to submit a deletion request, individuals may submit a request by emailing us at <u>consumerprivacy@TOTOUSAparts.com</u>.

California consumers have a right to opt out from TOTOUSAparts.com using their personal information for marketing purposes by TOTOUSAparts.com and TOTO USA.

To take advantage of your right to opt out, you need to submit a request by mail or telephone. Our telephone number is 1-888-232-8916. Our mailing address is: TOTOUSAparts.com Consumer Care Advocate Attention: CCPA Requests P.O. Box 368 Stillwater, MN 55082-0368

### **RIGHT TO NON-DISCRIMINATION**

The CCPA protects California consumers who exercise their rights from discrimination. TOTOUSAparts.com will not discriminate against consumers who request access to personal information about them, request deletion, or request that TOTOUSAparts.com opt them out of future contact.

#### **RIGHT TO USE AUTHORIZED AGENTS TO EXERCISE RIGHTS**

The CCPA allows California consumers to use authorized agents to submit requests to TOTOUSAparts.com on their behalf. TOTOUSAparts.com requires that the authorized agent verify his/hers/its identity and provide written authorization from the consumer to act on the consumer's behalf. If the agent is a business, it must also be registered with the secretary of state of the authorized agent's state of incorporation and provide proof of such registration.

In the case of an authorized agent's request for access to personal information, the resulting report will be delivered to the consumer directly. Prior to any release of the report to the consumer, TOTOUSAparts.com will require the consumer to complete the identity verification process described above to minimize the risk of unauthorized access to personal information and potential resulting harm.

#### HOW TO CONTACT US FOR MORE INFORMATION

If you have questions regarding your rights under CCPA or TOTOUSAparts.com data collection, use and disclosure practices, you may contact us by phone, mail, or email.

Our telephone number is 1-888-232-8916. Our email address is <u>consumerprivacy@TOTOUSAparts.com</u>.

Our mailing address is:

TOTOUSAparts.com Consumer Care Advocate Attention: CCPA Requests P.O. Box 368 Stillwater, MN 55082-0368

You may also contact the California attorney general. Please visit <u>https://www.oag.ca.gov/</u>, for more information.

### Questions

To ask questions about the TOTOUSAparts.com privacy policy, e-mail us at <u>consumerprivacy@TOTOUSAparts.com</u> or call us at 888-232-8916 between the hours of 8:00 am and 5:00 pm CST Monday through Friday.

# Other Important Information Security

TOTOUSAparts.com takes security seriously. We take reasonable precautions to keep our site and systems secure and to prevent unauthorized access or use.

## **Notification of Changes**

If we decide to change our privacy policy in a material way, we will post a notification highlighting those changes on our home page.

If we decide to use personally identifiable information in a manner different from that stated at the time it was collected, we will notify affected individuals by e-mail, if available. Individuals can choose whether or not to allow TOTOUSAparts.com to use information related to them in this new manner. If we do not receive permission, we will use the information in accordance with the privacy policy under which the information was collected.

In the event TOTOUSAparts.com is purchased, data collected on this site will be one of the transferred assets.

Policy Posting Date: 12/1/21