

## **MMI Textiles Inc – Privacy Notice**

### **I. Background**

This privacy notice lets you know what happens to any personal data that you give to us, or any that we may collect from or about you. It applies to all products or services and instances where we collect your personal data.

This privacy notice applies to personal information processed by or on behalf of MMI Textiles Inc.

### **Changes to this privacy notice**

We may change this privacy notice from time to time by updating this page in order to reflect changes in the law and/or our privacy practices. We encourage you to check this privacy notice for changes whenever you visit our website – [www.mmitextiles.com](http://www.mmitextiles.com).

We have a dedicated data protection officer (“DPO”). You can contact the DPO using the details below or by writing to 29260 Clemens Road Building II, Suite B, Westlake, Ohio 44145, attn: DPO, or by going to the Contact Us tab on our webpage.

### **2. What kinds of personal information about you do we process?**

Personal information that we will process in connection with all of our products and services, if relevant, includes:

- a. Personal and contact details, such as title, full name, email address, company name, company address, contact details, and contact details history.
- b. Your date of birth, gender and/or age.
- c. Your nationality, if needed for the product or service
- d. Records of your contact with us if you contact us via the telephone, email, or online services.
- e. Products and services you have purchased from us, as well as those products and services which you are interested in.
- f. The usage of our products and services.
- g. Marketing to you and analyzing data, including the history of those communications, whether you open them or click on links, and information about products or services we think you may be interested in, and analyzing data to help target offers to you that we think are of interest or relevance to you.
- h. Product and service information, such as the make, model, and/or style of the products or services purchased.
- i. Information about products and services that you have purchased and/or are interested in.
- j. Details about all of your existing purchases.
- k. The location of the business office that you work out of.

- i. Information we buy or rent from third-parties, including demographic information, publicly available information, and information to help improve our products and services.

### **3. What is the source of your personal information?**

We will collect personal information from the following general sources:

- a. From you directly.
- b. From information generated about you when you purchase our products or services.

### **4. What do we use your personal data for?**

We use your personal data, including any of the personal data listed in Section 2, above, for the following purposes:

- a. Assessing an application or request to purchase a product or service, including considering whether or not to offer you the product or service, the price, the risk of doing so, and the method and terms of payment.
- b. Updating your records.
- c. To improve the operation of our business and that of our business partners.
- d. To follow guidance and best practices under any rules of any governmental and/or regulatory bodies.
- e. For management and auditing of our business operations.
- f. To monitor and to keep records of our communications with you and our staff.
- g. To administer our good governance requirements, such as internal reporting and compliance obligations.
- h. For market research and analysis and the development of statistics.
- i. For direct marketing communications and related profiling to help us develop relevant products and services for our customers, including deciding whether or not we will offer you certain products and services. We will send marketing information to you by SMS, email, phone, post, social media, and digital channels (for example, Facebook).
- j. To provide personal content to you, such as tailoring our products and services, our digital customer experience and offerings, and deciding which (if any) offers to show you on our digital channels.
- k. To develop new products and services and to review and improve current products and services.
- l. To provide insight and analysis of our customers both for ourselves and for the benefit of our business partners either as part of providing product or services, helping us improve products and services, or to assess or improve the operating of our business.
- m. To share information, as needed, with our business partners or as part of providing and administering our products and services or the operation of our business.
- n. To facilitate the sale of one or more parts of our business.

**5. What are the legal grounds for our processing of your personal information (including when we share it with others)?**

We rely on the following legal bases to use your personal data:

- a. Where it is needed to provide you with our products or services, such as:
  - i. Managing products and services you have purchased from us.
  - ii. Updating your records.
  - iii. All stages and activities relevant to managing the product or service including inquiry, application, administration, and management of your account.
  
- b. Where it is in our legitimate interests to do so, such as:
  - i. Managing your products and services.
  - ii. To perform and/or test the performance of our products, services, and internal processes.
  - iii. To follow guidance and recommended best practice of government and regulatory bodies.
  - iv. For the management and audit of our business operations.
  - v. To administer our good governance requirements, such as internal reporting and compliance obligations.
  - vi. For market research and analysis and developing statistics.
  - vii. For direct marketing communications and related profiling to help us to offer you relevant products and services, including deciding whether or not to offer you certain products and services. We will send marketing to you by SMS, email, phone, post, social media, and digital channels (for example, Facebook).
  - viii. Subject to the appropriate controls, to provide insight and analysis of our customers to business partners either as part of providing products or services, helping us improve products or services, or to assess or to improve the operating of our business.
  - ix. For some of our profiling and other automated decision making.
  - x. Where we need to share your personal information with people or organizations in order to run our business or comply with any legal and/or regulatory obligations.
  
- c. To comply with our legal obligations.
  - i. With your consent or explicit consent:
    - 1. For some direct marketing communications.
    - 2. For some of our profiling and other automated decision making.

**6. When do we share your personal information with other organizations?**

We may share information with various vendors or third-parties but only to the extent to allow us to operate our business.

**7. How and when can you withdraw your consent?**

When we are relying upon your consent to process personal data, you can withdraw this at any time by contacting us using the details below or by writing to 29260 Clemens Road Building II, Suite B, Westlake, Ohio 44145, attn: DPO, or by going to the Contact Us tab on our webpage.

**8. Is your personal information transferred outside of the USA?**

We are based in the United States of America but sometimes your personal information may be transferred outside of the United States of America. If we do so we will make sure that suitable safeguards are in place, for example by using approved contractual agreements, unless certain exceptions apply.

**9. What should you do if your personal information changes?**

You should tell us so that we can update our records using the details in the Contact Us section of our website. We will then update your records if we can.

**10. Do you have to provide your personal information to us?**

We may be unable to provide you with our products and services if you do not provide certain information to us. In cases where providing some personal information is optional, we will make this clear.

**11. Do we do any monitoring involving processing of your personal information?**

In this section, monitoring means any: listening to, recording of, viewing of, intercepting of, or taking and keeping records (as the case may be) of calls, emails, text messages, social media messages, in person (face to face) meetings, and other communications.

We may monitor where permitted by law and we will do this where the law requires it, or to comply with regulatory rules, to prevent or detect crime, in the interests of protecting the security of our communications systems and procedures and for quality control and staff training purposes. This information may be shared for the purposes described above.

**12. For how long is your personal information retained by us?**

Unless we explain otherwise to you, we will hold your personal information based on the following criteria:

- a. For as long as we have reasonable business needs, such as managing our relationship with you and managing our operations.
- b. For as long as we provide goods and/or services to you and then for as long as someone could bring a claim against us.
- c. Retention periods in line with legal and regulatory requirements or guidance.

### **13. What are your rights under data protection laws?**

Here is a list of the rights that all individuals have under data protection laws. They do not apply in all circumstances. If you wish to use any of them, we will explain at that time if they do or do not apply. The right of data portability is only relevant from May 2018.

- a. The right to be informed about the processing of your personal information.
- b. The right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed.
- c. The right to object to processing of your personal information.
- d. The right to restrict processing of your personal information.
- e. The right to have your personal information erased (the “right to be forgotten”).
- f. The right to request access to your personal information and to obtain information about how we process it.
- g. The right to move, copy, or transfer your personal information (“data portability”).
- h. Rights in relation to automated decision making which has a legal effect or otherwise significantly affects you.

### **14. Your right to object**

You have the right to object to certain collection and processing of your personal information, in particular to data processed for direct marketing purposes and to data processed for certain reasons based on our legitimate interests. You can contact us by going to the Contact Us section of our website to exercise these rights.

### **15. What are your marketing preferences and what do they mean?**

We may use your home address, business address, phone numbers, email addresses, and social media or digital channels (for example, Facebook, Google and message facilities in other platforms) to contact you according to your marketing preferences.

You can Opt Out of any email or text marketing by following the unsubscribe links. If you receive a marketing call from us, you can ask the person who called you to opt you out. You can also write to us at 29260 Clemens Road Building II, Suite B, Westlake, Ohio 44145, attn: DPO, or by going to the Contact Us tab on our webpage.

### **Contact Us**

If you have any questions about this privacy notice, or if you wish to exercise your rights or contact the DPO, you can contact us by going to the Contact Us section of our website. Alternatively, you can write to MMI Textiles Inc, 29260 Clemens Road Building II, Suite B, Westlake, Ohio 44145, attn: DPO.