

PRIVACY AND E-COMMERCE POLICY STATEMENT

Tel-Tru Manufacturing Company (“Tel-Tru”) is dedicated to developing long-lasting relationships that are built on trust. Tel-Tru is committed to respecting the wishes of its customers when it comes to privacy. We will do everything in our power to ensure your right to privacy.

Tel-Tru has adopted the following privacy policy (“Privacy Policy”) to protect the personally identifiable information (“Personal Data”) you provide online, which is applicable to all information you provide during your use of the website, www.teltru.com (the “Site”). In this Privacy Policy we describe how we collect, use and disclose the Personal Data obtained via the Site.

Please review this policy carefully and contact us with any questions or concerns about our privacy practices. By visiting the Site, you agree that your Personal Data will be handled as described in this Policy. Your use of our Site, and any dispute over privacy, is subject to this Policy and our [Terms of Use](#).

The Privacy Policy may be revised at any time. Tel-Tru will display a notice when the Privacy Policy has been update or revised. Your continued use of the Site after the notice is published constitutes your acceptance of the revised Privacy Policy.

PERSONAL DATA

As of the date of this Privacy Policy, Tel-Tru allows users to willingly input and submit personally identifiable information, and may collect information directly from you in this way (through online forms, ordering online, e-mail correspondence, etc.), as well as automatically through your use of our Site (i.e., see the section “[Cookie Policy Statement](#)” below). You can browse certain areas of our Site without registering with us or providing your name or contact info. However, to access certain content on the Site, Tel-Tru may ask you to register or provide certain information to us. This information is collected by Tel-Tru for the use of contacting you to address your business needs.

In general, we collect information about you as follows:

•**Name, Contact, Log-In Information.** In order to access certain information, we may collect name, company name and/or contact information. Further, registered users may be provided log-in identifications (IDs) through which to access an e-commerce customer account. In order to obtain IDs, we may require that you provide your name, email, contact information, company information and other relevant information. If you submit a question or other communication to us, such as *via* the “Questions/Contact Us” link, we will collect your name, email, company name, phone number, country, and any other information you submit.

•**Usage Information.** In addition, in the course of using our Site we automatically track certain information about you, *via* Cookies and other technologies.

This information (“Personal Data”) includes, for example,

- The Internet Protocol (“IP”) address of your Internet Service Provider (ISP).
- The Web Browser used to access the Site

- The content and/or pages you access on the Site
- The products you order on the Site.
- The date and time of your visit to the Site
- The number of times you visit the Site
- Location information.
- The unique client ID of your device.

Please see the section "[Cookies](#)" below for more information.

PERSONAL DATA TRANSMISSIONS ARE ENCRYPTED

Upon agreement with you, you may submit and Tel-Tru will collect billing information, including your legal name, electronic mail (e-mail) address, home address, business address and telephone number.

Credit card information you provide online is encrypted and is used only within the scope of normal transactions between you, Tel-Tru, and our banking institutions. We use Transport Layer Security 1.2 (TLS 1.2), the industry standard, for encrypting all Personal Data; including name, address and credit card numbers.

Personal Data is accessible only by staff designated to handle online complaints or requests. All Tel-Tru staff members with access to Personal Data obtained on the Tel-Tru web sites are also bound to adhere to this policy.

HOW TEL-TRU USES PERSONAL DATA

Tel-Tru will not use your Personal Data for any purpose other than that for which it is submitted. We use Personal Data to reply to inquiries, handle complaints, provide notices and for record-keeping purposes.

More specifically, your Personal Data might also be used in the following ways:

- **Provision of Services:** To provide orders to you, to communicate with you about use of the Site and/or our products, to respond to your inquiries, and for other customer service purposes.
- **Provision of Info or Product Requests:** To provide you with materials, services, information, products or items you have requested and/or ordered, and to otherwise fulfill your requests/orders.
- **Account Communication:** To provide account-related information specific to your business relationship with Tel-Tru as a customer.
- **To Personalize the Site.** Tel-Tru may use information in order to personalize your user experience and/or inform you about additional products, services or content that may be of interest to you, and for other marketing and promotional purposes. For example, we may send you emails about products, services or other content Tel-Tru believes might interest

you. If you submit your phone number in order to receive more information from us, we may call or email you.

•**To Make Improvements:** Tel-Tru may use Personal Data to better understand how users access and use the Site in order to improve our Site, to improve our business, to address customer service issues, and for other research and analytical purposes. For example, Tel-Tru may use your Personal Data to assess the demographics or preferences of its customers.

Personal Data is actively retained by Tel-Tru as long as the account related to that information is active. If a user's account is cancelled or terminated, Tel-Tru retains the Personal Data on its servers but it will not be accessed by Tel-Tru or a third-party unless and until the account is restored. Tel-Tru's servers are located outside of the EU.

Tel-Tru engages in no profiling or automated decision-making with regard to Personal Data.

E-mail may be sent to inform you of news related to our services or offers by us. You may unsubscribe from our e-mails at any time through the Unsubscribe link provided in the e-mail.

DISCLOSURE TO THIRD PARTIES

As a general rule, Tel-Tru does not and will not share, provide, sell or lease any of your Personal Data with third parties for their marketing use without your express consent. Tel-Tru does not sell any Personal Data to third parties and will not redistribute your Personal Data (except in aggregate form, see below) without your permission.

However, certain Personal Data may be disclosed or shared as follows:

•**Business Transactions:** Tel-Tru may share your Personal Data with contractors, service providers, and other third parties used to support its business, including without limitation, hosting providers and payment processors.

•**Aggregate and De-Identified Information.** Tel-Tru may aggregate information collected from you with information from other customers and/or users of the Site for analysis, for example, to determine user and performance trends (: i.e. "50% of visitors to our website..."). Tel-Tru may de-identify this information to create aggregate anonymous data, and share such data with third parties for analytical, research, marketing, advertising, or similar purposes.

• **To Protect Us and Others and/or in Response to Legal Process.** Tel-Tru may disclose Personal Data where an abuse arises or we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our [Terms of Use](#) or this Policy, or as evidence in litigation in which Tel-Tru is involved.

Tel-Tru may also disclose Personal Data in compliance with a legal process, such as in response to a valid court order or subpoena. Such legal authority or reporting requirement may be within or outside the EU.

LAWFUL BASES (FOR GDPR COMPLIANCE)

Tel-Tru's collection of Personal Data is necessary for the purposes of fulfilling our contractual obligations with our clients in providing our services. Our use of Personal Data will not expand beyond any purpose other than that for which it is submitted.

In addition, Tel-Tru's collection of Personal Data is necessary for the purposes of the legitimate interests pursued by the consumer in using Tel-Tru services. We will not use your Personal Data for any purpose beyond what is reasonably necessary to provide our services to you.

CUSTOMER'S RIGHTS

All customers of Tel-Tru have the right to:

- Any and all information about the processing of your Personal Data;
- Obtain access to the Personal Data held about you at any time;
- Ask for incorrect, inaccurate or incomplete Personal Data to be corrected;
- Request that Personal Data be erased when it is no longer needed or if processing it is unlawful;
- Object to the processing of your Personal Data for marketing purposes or on grounds relating to your particular situation;
- Request a restriction of the processing of your Personal Data;
- Receive your Personal Data in a machine-readable format;
- Lodge a complaint about our use of Personal Data with an independent Data Protection Authority

We will respond to any request related to our data collection within one (1) month after we have received such request.

COOKIE POLICY STATEMENT

Cookies are pieces of information generated by a Web server and stored in the user's computer, ready for future access. Cookies are embedded in the HTML information flowing back and forth between the user's computer and the servers. Cookies are implemented to allow user-side customization of Web information. Tel-Tru understands that some users are concerned about cookies. Tel-Tru uses cookies to help us improve our website and provide our existing customers with the opportunity for continued savings and increased convenience. Tel-Tru uses cookies to inform us of a repeat visit. The cookie does not tell us who you are.

Most web browsers automatically accept cookies. You may, however, configure your browser to refuse all cookies or notify you when a cookie is being placed on the hard drive. You may also delete cookie files from your hard drive. Enabling, disabling, or deleting cookies can be completed by following the instructions provided by your browser.

By disabling, blocking and/or deleting non-essential cookies, you will be able to browse certain areas of the Site, but some features may not function. By disabling, blocking and/or deleting essential cookies, you may not be able to access our Site at all. **Please Note: To add products to your cart, cookies must be enabled in your browser.**

By using the Site you are deemed to accept the use of cookies in accordance with this Privacy Policy. Tel-Tru may update this section of our Privacy Policy in order to reflect, for example, changes to the cookies we use or for other operational, legal or regulatory reasons.

OPT-IN E-MAIL MARKETING

Opt-in e-mail marketing is 100% permission based. That means that subscribers to that list have stated that they want to receive promotional messages from designated sites or on selected categories.

Tel-Tru's online forms provide the opportunity for the user to (opt-in) check a box to receive, via e-mail, new product and/or company information when it is released. Your information may be combined with other Personal Data such as demographic data and past purchase information to make our future marketing efforts more effective. We never share Personal Data about our customers' or our subscription list with third parties. You can 'unsubscribe' at any time. All opt-in e-mail correspondence we send you will include a description of how to stop receiving future opt-in e-mails. Should you choose to 'unsubscribe' to the Tel-Tru e-mail program, you will only receive communications from us via mail, telephone, or e-mail as it pertains to your online order/correspondence.

CUSTOMER'S RESPONSIBILITY

All communications between Tel-Tru and the end party is deemed copyrighted material and is the property of Tel-Tru. It may not be reproduced, copied or printed out and distributed without the written consent of Tel-Tru. This includes, but is not limited to communications disclosed to us through email, online forms, ordering online.

CONTACT INFORMATION

Tel-Tru may be reached by mail at the following address:

Tel-Tru Manufacturing Company
408 St. Paul Street
Rochester, New York 14605 USA

Tel-Tru may also be reached by phone between 8am and 5pm EST at 1-800-232-5335, or by fax at 585-232-3857. We may be reached for any abuse issues at TTprivacy@teltru.com.

CHANGES TO THIS SITE

Tel-Tru reserves the right to change our policies at any time and the information on this site may change at any time. We will notify our users of any pending changes, via email and our webpage, prior to any change.

To ensure that you are receiving the most accurate information--**please frequently visit our website!** Users can cancel their account and terminate their use of our services at any time.