

Privacy Policy

LAST UPDATED: December 20, 2019

This Privacy Policy describes the information FPI Fireplace Products International Ltd. and its subsidiaries (“FPI”, “us”, “we”, or “our”) collects about you, how we use and share that information, and the privacy choices we offer. Please read the following to learn more about our Privacy Policy. This Privacy Policy applies only to information we collect through our Website, mobile applications, other online products and services and various off-line sales and marketing events we conduct and/or sponsor (collectively, the “Services”) and does not apply to our collection of information from other sources. FPI is committed to protecting personal information you may provide us through our Services.

INFORMATION YOU PROVIDE AND WE COLLECT

FPI collects both personal information you provide on this website, and automatically-collected information that does not directly identify you.

1. Personal information includes any information that may be used to specifically identify or contact you, such as your name, mailing address, phone number, email, etc. which may have been received by us when requesting information or technical help, or when registering for certain information, warranty, or events both on- and off-line.

2. Non-personal information can include certain personal information that has been de-identified. We obtain non-personal information about you from information that you provide us, either separately or together with your personal information. We also automatically collect certain personal information from you when you access our Services. This information can include, among other things, IP addresses, the type of browser you are using (e.g., Internet Explorer, Safari, Chrome, etc.), the Services from which your visit originated, the operating system you are using (e.g., Windows 7/8, Windows XP, Mac OS, Android, iOS, etc.), the domain name of your Internet service provider (e.g., Shaw, Telus, Verizon, ComCast, etc.), the search terms you use on our Services, data that tracks the specific web pages you visit, and the duration of your visits.

OTHER USES & INFORMATION

1. IP Addresses: An IP address is a number that is automatically assigned to your computer whenever you are surfing the Internet. Web servers (computers that "serve up" web pages) automatically identify your computer by its IP address. When visitors request pages from our Services, our servers typically log their IP addresses. We collect IP addresses for purposes of system administration, to report aggregate information to others, and to track the use of our Services. It is not our practice to link IP addresses to anything personally identifiable; that is, the visitor's session will be logged, but the visitor remains anonymous to us. However, we reserve the right to use IP addresses to identify a visitor when we feel it is necessary to enforce compliance with our Services' rules or to: (a) fulfill a government request; (b) conform with the requirements of the law or legal process; (c) protect or defend our legal rights or property, our Services, or other users; or (d) in an emergency to protect the health and safety of our Services' users or the general public.

2. *Cookies, etc.:* "Cookies" are small text files from a website and/or mobile device that are stored on your hard drive and/or other storage device. These text files make using our Services more convenient by, among other things, saving your passwords and preferences for you. We may analyze the information derived from these cookies and other technological tools we employ (such as clear gifs/web beacons) and match this information with data provided by you or another party. We may provide our analysis and certain non-personal information to third parties (who may in turn use this information to provide advertisements tailored to your interests), but this will not involve disclosing any of your personal information. Please note that advertisers that serve advertisements on our Services may also use their own cookies and other technological tools that are subject to the advertiser's privacy policies, not this Privacy Policy.

3. *Email Communications:* If you send us an email with questions or comments, we may use your personal information to respond to your questions or comments, and we may save your questions or comments for future reference. For security reasons, we do not recommend that you send non-public personal information, such as passwords, social insurance/security numbers, or bank account information, to us by email. However, aside from our reply to such an email, it is not our standard practice to send you email unless i) you request a particular service or sign up for a feature that involves email communications, ii) it relates to purchases you have made with us (e.g., product updates, customer support, etc.), iii) we are sending you information about our other products and services, or iv) you consented to being contacted by email for a particular purpose. In certain instances, we may provide you with the option to set your preferences for receiving email communications from us; that is, agree to some communications but not others.

DISCLOSURE TO OUTSIDE PARTIES

We do not sell, trade, or transfer your personal information to third parties, except in the circumstances described below.

Our Dealers

We share your personal information with our Dealer network in order to better serve your specific needs, requests, inquiries, and other customer service communications. We consider this information private and make every attempt to protect and limit how it is used and disclosed. If you do not wish to have this information shared, or if you want to inform us that you do not wish to receive additional information from FPI, please contact FPI's Privacy Compliance Officer at privacy@regency-fire.com

Third Party Service Providers

We share your personal information with our vendors and other third-party service providers that help us provide our Services, support features on our website, or otherwise market our Services to consumers. These service providers are responsible for their own compliance with data protection laws.

Legal Requirements and Business Transfers

We may disclose personal information (i) if we are required to do so by law, legal process, statute, rule, regulation, or professional standard, or to respond to a subpoena, search warrant, or other government official requests, (ii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, (iii) in connection with an

investigation of a complaint, security threat, or suspected or actual illegal activity; (iv) in connection with an internal audit; or (v) in the event that FPI is subject to mergers, acquisitions, joint ventures, sales of assets, reorganizations, divestitures, dissolutions, bankruptcies, liquidations, or other types of business transactions. In these types of transactions, personal information may be shared, sold, or transferred, and it may be used subsequently by a third party.

THIRD-PARTY ADVERTISING AND ANALYTICS

We may allow third parties to serve advertisements in connection with the use of our Services and to provide analytics services. We have implemented Display Advertising and Remarketing with Google Analytics to advertise online. We and third-party vendors, including Google, use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick cookie), web beacons, and other technologies to collect information, such as your IP addresses, identifiers associated with your mobile device or applications on the device, the browsers you use to visit our website, pages viewed, time spent on pages, links clicked, and conversion information. Together, this information may be used by FPI and other companies to inform, optimize, and serve ads based on someone's past visits to our website, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests, and better understand your usage. This Privacy Policy does not apply to, and we are not responsible for, third-party cookies, web beacons, or other tracking technologies, and we encourage you to check the privacy policies of these third parties to learn more about their privacy practices. For more information about targeted advertising specifically, or to opt out of having your browser information used for these purposes, please visit:

- Google Analytics opt-out browser add-on (<https://tools.google.com/dlpage/gaoptout/>);
- <http://www.aboutads.info/choices>
- http://www.networkadvertising.org/managing/opt_out.asp

YOUR CHOICES ABOUT YOUR PERSONAL INFORMATION

Cookies

Most web browsers automatically accept cookies, but you can change your browser's settings to disable all or certain cookies if you wish. Please note that by disabling or deleting cookies, you may not be able to access the full functionality of our Services. Disabling or clearing cookies also may affect cookie-based opt-outs by either preventing you from using such cookie-based opt-outs or clearing opt-outs that you previously set.

Email

You may "opt out" of receiving future commercial email communications from us by clicking the "unsubscribe" link included at the bottom of any commercial emails we send; provided, however, we reserve the right to send you transactional emails such as customer service communications.



Do Not Track

Because there currently is not an industry or legal standard for recognizing or honoring Do Not Track (“DNT”) signals, we do not respond to them at this time.

LOCATION OF OUR SITE

Our website is hosted in Canada and operated in the United States. We and our service providers may store information about individuals in the United States, or we may transfer it to, and store it within, other countries.

Visitors from jurisdictions outside the United States visit us at their own choice and risk.

If you are not a resident of the United States, you acknowledge and agree that we may collect and use your personal information outside your home jurisdiction, and that we may store your personal information in the United States or elsewhere. Please note that the level of legal protection provided in the United States from which you may access our Sites may not be as stringent as that under privacy standards or the privacy laws of other countries, possibly including your home jurisdiction.

RETENTION OF YOUR PERSONAL INFORMATION

We will keep your personal information for the period necessary to fulfil the purposes described in this Privacy Policy, unless a longer retention period is permitted or required by law.

SECURITY OF YOUR PERSONAL INFORMATION

We have implemented reasonable physical, technical, and administrative security standards to protect personal information from loss, misuse, alteration, or destruction. We strive to protect your personal information against unauthorized access, use or disclosure, using security technologies and procedures, such as encryption and limited access.

CHILDREN

Our Services are not intended for children under 13 years of age. No one under age 13 may provide any information to or on our website. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on our website or on or through any of its features, including your name, address, telephone number, or e-mail address. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at privacy@regency-fire.com.

LINKS TO OTHER SITES

These Services may contain links to other sites such as our Dealer network, which are not owned or controlled by us. Please be aware that we, FPI, are not responsible for the privacy practices of such other sites. This privacy statement applies only to information collected by our Services.

YOUR CALIFORNIA PRIVACY RIGHTS

California law permits residents of California to request certain details about information we disclose to third parties for direct marketing purposes. If you are a California resident and would like to request this information, please contact us at the address listed below. Please note you are limited to one request per calendar year. In your request, please attest to the fact that you are a California resident and provide a current California address for our response. This request may be made no more than once per calendar year.

Pursuant to applicable California law, including the California Consumer Privacy Act (CCPA), FPI makes the following disclosures regarding the personal information FPI has collected within the last 12 months:

<u>Category of Personal Information</u>	<u>Category of Source from Which Data is Collected</u>	<u>Purpose of Collection</u>	<u>Category of Third Parties to Whom Data is Disclosed</u>
Contact information such as name, e-mail address, zip code	Directly from consumers	To provide to our dealers in order to market and provide our Services; to process warranties and rebates; to contact our end user customers	Our dealer network and other Service Providers
Lead information such as fuel type, timeline for purchase, fireplaces and accessories preferences	Directly from consumers	To provide to our dealer network in order to market and sell our products	Our dealer network and other Service Providers
Automatically collected information such as IP address, browser type, and device type	Cookies and other tracking technologies	To analyze and track usage data; to determine the popularity of certain content; to deliver advertising and content targeted to user interests	Service Providers

FPI has not sold consumers’ personal information in the twelve (12) months preceding the Effective Date of this Privacy Policy.

If you are a California resident, pursuant to the California Consumer Protection Act (CCPA), you have the right to request:

- the categories of personal information FPI has collected about you;

- the categories of sources from which your personal information is collected;
- the business or commercial purpose of collecting or selling your personal information;
- the categories of third parties with whom FPI shares your personal information;
- the specific pieces of personal information FPI has collected about you;
- the categories of personal information that FPI has sold about you and the categories of third parties to whom the personal information was sold, if applicable;
- deletion of your personal information; and
- an opt out of having your personal information disclosed or sold to third parties.

To submit a request, or designate an authorized agent to make a request under the CCPA on your behalf, please contact us at privacy@regency-fire.com, 866-867-4328, or complete the web form located at [INSERT LINK]. To verify your identity when you submit a request, we will match the identifying information you provide us to the personal information we have about you. If you have an account with us, we will also verify your identity through our existing authentication practices for your account.

FPI will not be required to comply with your request to delete your personal information if it is necessary for FPI to maintain your personal information in order to:

- complete the transaction for which the personal information was collected, provide a good or service requested by you, or reasonably anticipated within the context of FPI's ongoing business relationship with you, or otherwise perform a contract between you and FPI;
- detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;
- debug to identify and repair errors that impair existing intended functionality;
- exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;
- comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code;
- engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when FPI's deletion of the information is likely to render impossible or seriously impair the achievement of such research, if you have provided informed consent;
- to enable solely internal uses that are reasonably aligned with your expectations based on your relationship with FPI;

- comply with a legal obligation; or
- otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

FPI will not discriminate against you in the event you exercise any of the aforementioned rights under CCPA, including, but not limited to, by:

- denying goods or services to you;
- charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
- providing a different level or quality of goods or services to you; or
- suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

This Policy is available to consumers with disabilities. To access this Policy in an alternative downloadable format, please click [[HERE](#)].

CHANGES IN THIS PRIVACY STATEMENT

By using our Services, you signify your agreement with this Privacy Statement. FPI reserves the right, in its sole discretion, to change, modify, add, or remove portions of this policy at any time. Your continued use of our Services following changes to these terms signifies your acceptance of such changes.

If you have any questions regarding our privacy policy, please contact us.

FPI Fireplace Products International Ltd.

Attn: Privacy Department

Email: privacy@regency-fire.com