

Privacy Policy

Effective October 14, 2024

The Stow Company (“we,” “us,” “our”) works hard to build and maintain a relationship of trust with you. This Privacy Policy (“Privacy Policy”) governs our collection, use, and disclosure of your Personal Information (as defined below) in connection with your use of our websites on which this Privacy Policy is linked (collectively, “Sites”) and any transactions, interactions, or other engagements you might have with us (collectively, “Services”). We market our Services through our brands Closet Evolution, EasyClosets, EasyGarage, Easy Track, Garage Essentials, Gorgeous Garage, Inspired Closets, ORG Home, ProClosets, Serenity Closes, and SimplyNeu. For clarity, the term “Sites” does not include any sites owned or operated by third parties.

Please read this Privacy Policy carefully before using our Sites and/or engaging with us. If you do not agree with this Privacy Policy, you must refrain from using our Sites and/or engaging with us. By accessing or using our Sites and/or engaging with us, you agree to our use of your information consistent with this Privacy Policy.

Information We Collect

Personal Information

We may collect information that personally identifies, relates to, describes, or is capable of being associated with you (“Personal Information”), including:

- **Personal identifiers and contact information** such as name, mailing address, physical address, email address, phone number, IP address, and account login credentials;
- **Commercial information** such as payment information (account number or credit card number and expiration date), product interest, purchase history and information from your participation in surveys;
- **Audio, electronic, visual, thermal, olfactory, or similar information** such as call and written communication recordings and pictures from consumers;

- **Professional/employment information** such as business name, job title, professional licenses/certifications.
- **Internet & network information** such as browsing/search history, data collected by cookies, pixels, and similar technologies, and device specifications such as device IDs, browser type, and operating system;
- **Inferences** drawn from the above categories of Personal Information that relate to your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes; and
- **Personal information as described in Cal. Civ. Code § 1798.80(e)** solely to the extent collected under another category of Personal Information above.

Some of the Personal Information listed above may further be considered “Sensitive Personal Information” under relevant privacy laws. This includes account login credentials.

The types of Personal Information we collect about you may vary based on how you use our Sites and/or your relationship with us.

Business Information

We also collect information about businesses and their representatives that engage with us such as EIN, TIN, address, phone number, email address, and bank account information (collectively, “Business Information”). This information is generally not considered Personal Information because it relates to a business. If such Business Information relates to a business contact person, we will treat it as Personal Information.

Usage Data and Site Activity

We automatically collect information in connection with the actions you take on our Sites (“Usage Data”). For example, each time you use our Sites, we may automatically collect the type of web browser you use, the type of device you use, your device ID, your operating system and version, your IP address, your internet service provider, the pages you view, referring and exit pages, the date and time of your visit, and the number of clicks to, from, and within our Sites, and the duration of your visits to our Sites. If the data we automatically collect is capable of being associated with you, directly or indirectly, we treat it as Personal Information. If this information is not capable of being individually associated with you, we treat it as anonymous Usage Data.

Communication Recordings

We may record calls and retain the content of written and electronic communications between you and us. By communicating with us, you consent to our recording and retention of communications.

Anonymized Information

From time to time we may collect or create anonymized information. Once we have anonymized Personal Information, we will not attempt to reidentify the individuals associated with such anonymized information. We may collect, use, and disclose anonymized information for any lawful purpose.

How We Collect Information

Voluntary Disclosure

We may ask you to provide us with Personal Information when you communicate with us, including when you schedule a consultation, when you create an account, when you place an order, and when you make a payment. If you choose not to provide the requested information, you may not be able to use some or all of the features of our Sites or Services or we may not be able to fulfill your requested interaction.

Third-Party Data Sources

We may collect Personal Information from third-party data sources such as marketing and sales agencies or partners, analytics firms, social media companies, dealers of our products and Services, and customer management and feedback companies.

Cookies and Automated Tools

We and third parties use cookies (small text files placed on your computer to identify your computer and browser) and other automated tools such as pixels and clear gifs (collectively, “cookies”) to track your interaction with our Sites and to improve the experience of our Sites and Services, such as saving your preferences from visit to visit to present you with a customized version of the Sites and tracking certain aspects about a user’s visit or engagement with an email or other communications. Many web browsers are initially set up to accept cookies. You can reset your web browser to refuse all cookies or to indicate when a cookie is being sent. However, certain features of our Sites may not work if you delete or disable cookies.

We use the following types of cookies:

- *Strictly Necessary:* These cookies are essential to operate the Sites and provide you with services you have requested.
- *Functional:* These cookies enable certain features or non-essential functionality on our Sites. For example, we might use these cookies to recognize you and remember your preferences or settings when you return to our Sites so we can provide you with a more personalized experience.
- *Advertising Cookies:* These cookies allow us and third parties to learn more about you, including your use of our Sites and other websites, and to advertise products or services that might interest you as further indicated below.
- *Analytics Cookies:* These cookies help us, and third parties understand how our Sites are working and who is visiting our Sites.

User activity information may be associated with additional information about a user's session and Personal Information, if provided by the user.

You can opt-out of certain types of cookies and other tracking tools by clicking the cookie settings icon at the bottom of applicable Sites.

If you arrive at our Sites by “clicking through” from another website, then certain information about you that you provided to that other website, such as the terms you searched that led you to our Sites, may be transmitted to us and we may use it. You should review the Privacy Policy of any website from which you reached our Sites to determine what information the operator collects and how it uses such information. We may retain information about you provided to us by other websites and will use it in accordance with this Privacy Policy. Such information may be associated with other Usage Data or Personal Information.

Google Analytics

One tool we use is Google Analytics. For more information about Google Analytics, including how it collects and processes Personal Information and Usage Data, please review Google's [Safeguarding Your Data](#) disclosure.

Session Replay Technology

We use third-party tools on our Sites that allow us replay or recreate how a visitor interacted with our Sites (e.g., mouse movements, button clicks, hovering, keypresses). By interacting with our Sites, you consent to our use of

these tools and recording of your interaction with our Sites by us and the tool provider on our behalf.

Targeted and Cross-Context Behavioral Advertising

We may work with third-party advertisers, search providers, social media companies, and ad networks (collectively, “Ad Networks”) to learn more about you and show you ads or other content that we believe would be relevant to you. Advertisers may collect and use information about your use of our Sites or Services as well as other websites and services. These companies may use cookies and other online tracking technologies to collect and use your information. We and/or Ad Networks may also append other data to the data collected by Ad Networks to create an interest profile of individual users. Our Privacy Policy does not cover any use of information that an Ad Network may collect from you except when the Ad Network acts as our service provider. Advertisements may be shown via our Sites or on third-party websites. If you do not want to receive interest-based advertising, please visit the Digital Advertising Alliance (DAA) Consumer Choice Page. The DAA website allows you to opt-out of one or more interest-based advertising networks. Opt-outs are device and browser specific; therefore, you must set your opt-out preferences for each device and browser. Deleting browser cookies can remove your opt-out preferences; however, the DAA offers browser extensions that help preserve the opt-out preferences you set on the DAA's Consumer Choice Page. Please note that opt-outs only apply to interest-based advertising from participating Ad Networks. You may still receive other types of online advertising.

Information from Advertisements

If you arrive at the Site via an advertisement (e.g., banner ad), we may collect information regarding the advertisement with which you interacted and your interactions (e.g., item clicked, date and time).

Surveys

From time to time, we may request Personal Information from consumers via surveys. Participation in these surveys is completely voluntary and you have a choice whether or not to disclose Personal Information. The requested information typically includes personal identifiers and contact information.

How We Use and Disclose Information

We may use Personal Information for business purposes, such as to:

| Processing Purpose | Personal Information Used |
|--|---|
| Fulfill or meet the reason you provided the information. For example, if you provide your personal information to purchase our Services, we will use that information to process your payment and facilitate delivery. We may also save your information for these purposes. | <ul style="list-style-type: none"> • Identifiers and contact information • Audio, electronic, visual, thermal, olfactory, or similar information • Commercial information • Professional/employment information • Internet & network information • Inferences |
| Provide, offer, support, personalize, or develop our Sites and Services. | <ul style="list-style-type: none"> • Identifiers and contact information • Audio, electronic, visual, thermal, olfactory, or similar information • Commercial information • Professional/employment information • Internet & network information • Inferences |
| Create and secure your online account with us. | <ul style="list-style-type: none"> • Identifiers and contact information • Commercial information • Internet & network information |
| Process your purchases, transactions, and payments and prevent transactional fraud. | <ul style="list-style-type: none"> • Identifiers and contact information • Audio, electronic, visual, thermal, olfactory, or similar information • Commercial information • Professional/employment information • Internet & network information |
| Provide you with support and respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses. | <ul style="list-style-type: none"> • Identifiers and contact information • Audio, electronic, visual, thermal, olfactory, or similar information • Commercial information • Professional/employment information • Internet & network information |
| Help maintain the safety, security, and integrity of our Sites, Services, | <ul style="list-style-type: none"> • Identifiers and contact information |

| | |
|--|---|
| databases, and other technology assets. | <ul style="list-style-type: none"> • Audio, electronic, visual, thermal, olfactory, or similar information • Commercial information • Professional/employment information • Internet & network information • Inferences |
| Test, research, analyze, and conduct product development to develop and improve our products, Sites, and Services. | <ul style="list-style-type: none"> • Identifiers and contact information • Audio, electronic, visual, thermal, olfactory, or similar information • Commercial information • Professional/employment information • Internet & network information • Inferences |
| Carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection. | <ul style="list-style-type: none"> • Identifiers and contact information • Audio, electronic, visual, thermal, olfactory, or similar information • Commercial information • Professional/employment information • Internet & network information • Inferences |
| Respond to law enforcement requests and as required by applicable law, court order, or governmental regulations. | <ul style="list-style-type: none"> • Identifiers and contact information • Audio, electronic, visual, thermal, olfactory, or similar information • Commercial information • Professional/employment information • Internet & network information • Inferences |
| Evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which | <ul style="list-style-type: none"> • Identifiers and contact information • Audio, electronic, visual, thermal, olfactory, or similar information • Commercial information • Professional/employment information • Internet & network information • Inferences |

| | |
|--|---|
| personal information held by us is among the assets transferred. | |
| Send promotional messages, marketing, advertising, and other information that may be of interest to you based on your preferences. | <ul style="list-style-type: none"> • Identifiers and contact information • Audio, electronic, visual, thermal, olfactory, or similar information • Commercial information • Internet & network information • Inferences |
| Personalize, measure, and improve our advertising to you. | <ul style="list-style-type: none"> • Identifiers and contact information • Audio, electronic, visual, thermal, olfactory, or similar information • Commercial information • Internet & network information • Inferences |
| Fulfill any other use that we describe when you provide the information. | <ul style="list-style-type: none"> • Identifiers and contact information • Audio, electronic, visual, thermal, olfactory, or similar information • Commercial information • Professional/employment information • Internet & network information • Inferences |

We also use Sensitive Personal Information for the following purposes:

- *Account login credentials* – To facilitate the transactions you requested and maintain our customer relationship with you.

We only use Sensitive Personal Information related to California residents for purposes permitted by California Privacy Rights Act regulations (i.e., outside the scope of limitation rights).

Service Providers

We may provide your Personal Information to other businesses that provide services to us or on our behalf (“Service Providers”). Categories of Service Providers we use include:

- ***Fulfillment and account servicing vendors***, which help us provide products, services and information to you, service your account or benefits, and collect past due balances;
- ***Payment processors***, which help us to accept and process payments;
- ***Marketing and Communications vendors***, which help us market our Services to you, conduct, surveys, and communicate about our business, including vendors providing mail, email, telephone, and text message services;
- ***Research and development vendors***, which help us conduct research and develop enhancements to our Sites and Services;
- ***Data and business analytics vendors***, which help us collect, analyze, and improve the accuracy of our data (including Personal Information);
- ***IT and network administration vendors***, which provide services such as data storage and management, website hosting, and data security;
- ***Professional service firms***, which provide accounting, legal, HR and other professional services and software; and
- ***General service providers***, which help us with day-to-day business operations such as office support services, courier services, facilities management, and document destruction.

Each Service Provider is expected to use reasonable security measures appropriate to the nature of the information involved to protect your Personal Information from unauthorized access, use, or disclosure.

Third-Party Disclosures

We may also sell or share (for targeted or cross-context behavioral advertising), and have sold or shared in the past twelve months, Personal Information with third parties who are not our Service Providers (“Third Parties”) as follows:

| Category of Third Party | Sale or Sharing | Purpose of Sale or Sharing | Categories of Personal Information |
|---------------------------------------|-----------------|---|--|
| Ad networks & ad technology providers | Sharing | To facilitate our advertising of goods and services | <ul style="list-style-type: none"> • Identifiers and contact information (we do not share text message opt-ins with ad networks and ad technology providers for their own marketing purposes) • Audio, electronic, visual, thermal, olfactory, or similar information • Commercial information • Professional/employment information • Internet & network information • Inferences |

Other Third-Party Disclosures

We may occasionally disclose your Personal Information to Third Parties for purposes such as:

- To dealers of our products and services to facilitate transactions or interactions (e.g., marketing) requested by you.
- To comply with the law.
- To respond to legal requests (including court orders, investigative demands and subpoenas) if, in our discretion, we believe it is necessary or appropriate.
- To prevent or stop any illegal, unethical, or legally actionable activity.
- To protect the safety, property, or rights of ourselves, consumers, or any other third party.
- If we are merged, acquired, or sold, or in the event of a divestiture, restructuring, reorganization, or transfer of some or all of our assets and the disclosure is necessary to complete the transaction.
- To businesses controlling, controlled by, or under common control with us as permitted by law.
- For additional purposes with your consent where such consent is required by law.

Except as stated above, we have not disclosed Personal Information to Third Parties for a business purpose in the prior twelve months.

Other Important Privacy Provisions

Security

We recognize the importance of safeguarding the confidentiality of Personal Information from loss, misuse, or alteration. Accordingly, we employ commercially reasonable administrative, technical, and physical safeguards to protect Personal Information from unauthorized access, disclosure, and use. Even with these safeguards, no data transmission over the Internet or other network can be guaranteed 100% secure. As a result, while we strive to protect information transmitted on or through our Sites or Services, you do so at your own risk.

Links and Other Websites

Our Sites may contain links to third party websites. Please be aware that if you access these links, you will be leaving our Site. We encourage users to read the privacy policies of those sites, as we are not responsible for their content, links, or privacy procedures.

Updates

We may update this Privacy Policy in the future and will post any updates on our Sites. Updates are effective immediately upon posting. By continuing to use our Sites or Services after the update, you agree to the updated Privacy Policy.

Children's Privacy

Our Sites and Services are not intended for children under the age of 18 and we do not knowingly collect Personal Information from children under the age of 18. If we become aware that we have inadvertently received Personal Information from a child under the age of 18, we will delete such information from our records.

Additional State Consumer Rights

If you are a resident of California, Colorado, Connecticut, Delaware, Iowa, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Texas, Utah, or Virginia, you have additional rights to access and control your Personal

Information as described more fully below. We will retain a record of your request for at least two years and in compliance with applicable laws.

Right to Know

You have the right to request twice per 12-month period that we provide you (i) the categories or specific pieces of Personal Information we collected about you; (ii) the categories of sources from which we collected your Personal Information; (iii) the business or commercial purpose for which we collected your Personal Information; and (iv) the categories of Third Parties with whom we shared or sold your Personal Information. We are not permitted to provide access to specific pieces of Personal Information if the Personal Information is sensitive or creates a high risk of potential harm from disclosure to an unauthorized person.

If you are an Oregon resident, you have the right to request once per 12-month period that we provide you with a list of specific Third Parties to whom we disclosed (a) your Personal Information or (b) any Personal Information. We have the discretion to determine which list to provide.

Right to Deletion

You have the right to request that we delete any Personal Information we collected about you. Please understand that we are not required to honor a deletion request if a legal exemption applies such as if we need the information to complete a requested or reasonably anticipated transaction, prevent security incidents or fraud, enable internal uses that are reasonably aligned with your expectations, or comply with legal obligations.

Right to Correction

You have the right to request that we correct any Personal Information that we have on file about you that you believe to be erroneous. When you make your request, please be sure to provide us with the specific information that you believe is inaccurate and the correct information. You should also provide us with any documentation you believe supports your proposed correction, and we will take that documentation into consideration. We will only correct the information if we determine, based on the totality of the circumstances, that your correction is more likely than not accurate. We may also choose to delete the allegedly inaccurate information instead of correcting it.

Right to Opt-Out of Sales or Sharing

You have the right to direct us not to sell or share (for cross-context behavioral advertising purposes) your Personal Information to Third Parties.

We will recognize browser-based opt-out signals as required by law, specifically Global Privacy Control. If we receive an opt-out signal and are able to identify the consumer to whom the signal relates, we will treat the signal as a request to opt out of the sale or sharing of all Personal Information we have on file for the consumer and disable cookies and other tracking tools placed by Third Parties. If we receive an opt-out signal and are not able to identify the consumer to whom the signal relates, we will treat the signal as a request to opt out limited to the Personal Information we collect from the consumer during the online session during which the signal is present and to disable cookies and other tracking tools placed by Third Parties.

Right to Appeal

If we deny your privacy request, in full or in part, you may appeal our decision. If we deny your appeal, you may also contact your state Attorney General to lodge a complaint and we will provide you with an online mechanism to do so.

Submitting a Request

If you are a resident of a state that provides privacy rights and you would like to exercise your rights, you may submit a request by telephone at 800-562-4257. Please note that requests to opt out of sales/sharing will not impact the cookies and other tracking tools used on our Sites. To manage the use of cookies and other tracking tools on our Sites, you should access the relevant Site's cookie management tool by clicking "cookie preferences" in the footer of the Site. Cookie preferences are Site, device, and browser specific meaning you will need to individually set your cookie preferences for each Site you visit on each device and from each browser you use to visit the Site.

After you submit your request, we may contact you to obtain additional information necessary to verify your identity. For example, we may require you to verify certain information in our files or submit a signed declaration under penalty of perjury verifying your identity. We will not be able to process certain requests without verifying your identity, so please respond promptly to our request.

We will respond to verified requests to know, correct, delete, and appeal within 45 days, and verified requests to opt-out of sales/sharing within 15 business days, subject to any applicable exceptions and extensions permitted by law. You do not need to create an account with us to make a verifiable consumer request. We will deliver our written response by mail or electronically, at your option.

Authorized Agent

If you are an authorized agent submitting a request on behalf of a California resident, you must provide a copy of a lawful power of attorney or a written signed authorization from the consumer along with proof of your identity. You may provide this documentation via email to info@thestowcompany.com after submitting the request. We may contact you and the consumer on whose behalf you claim to act to verify your identity, the consumer's identity, and your authorization to act on the consumer's behalf.

Non-Discrimination Notice

We will not discriminate against any consumer for exercising their privacy rights under law or this Privacy Policy.

California "Do Not Track" Disclosure

Do Not Track is a web browser privacy preference that causes the web browser to broadcast a signal to websites requesting that a user's activity not be tracked. Currently, our Sites and Services do not respond to "do not track" signals.

Nevada Resident Sale Opt-Out Right

If you are a resident of Nevada, you have the right to direct us not to sell your Personal Information to Third Parties. You may exercise this right by telephone at 800-562-4257. We will process your request within 60 days of receipt, subject to exceptions or extensions permitted by law. We may request additional information in order to verify your identity or residency prior to acting on your request.

Contact Us

If you have any questions about this Privacy Policy, please contact us:

Toll-Free Number: 800-562-4257

Email: info@thestowcompany.com

Address: 130 Central Ave., Holland, MI 49423