

# Privacy Policy

Updated October 2022

This privacy policy outlines what information (“PERSONAL DATA”) is collected from you (“SUBSCRIBER”) and how that information is handled by XL Engineering, Inc. (the “COMPANY”). All is done in accordance with the recent General Data Protection Regulation (GDPR)

Summary: The COMPANY provides various ways for you to add your personal information to their database. By clicking on “Submit” “Sign-up” “Subscribe” “Buy now” “Purchase” and or any other button (or functionality) that has a similar meaning you are providing your explicit consent to be added to the COMPANY’s communication system. The COMPANY outlines below the methods of communicating with you based on the information you provide. You may opt-out of this at any time by clicking on the “unsubscribe” button included on all email, messenger, and or currently available means communication that the COMPANY has described below it may use to communicate with you.

XL ENGINEERING, INC. (the “COMPANY”) respects the privacy concerns of the users of its website, [www.xl-engineering.com](http://www.xl-engineering.com) and the services and or goods provided there (the “SITE”). The COMPANY provides this privacy statement to explain what information is gathered during a visit to the SITE and how such information may be used.

Please also review the Terms of Use at [www.xl-engineering.com/terms](http://www.xl-engineering.com/terms) which also govern your use of this SITE.

## USE OF INFORMATION

As a general policy, no personally identifiable information (“PERSONAL DATA”), such as your name, address, or e-mail address, is *automatically* collected from your visit to the SITE.

ANY PERSONAL DATA COLLECTED BY THE SITE MUST BE VOLUNTARILY ENTERED BY THE SUBSCRIBER.

PERSONAL DATA is information that specifically identifies you (name, email address, ship to/bill to address, phone number) and can be used to specifically locate you from within the COMPANY’S database and or filing system.

The SITE’S various mailing lists, downloads, special offers, contests, registration forms, and surveys may request that you give the COMPANY contact information such as your

- Name
- Email
- Phone Number
- Address

Information submitted at the time of submission will be used by the COMPANY to:

- Email SUBSCRIBER the requested information from the COMPANY;
- Email SUBSCRIBER a weekly and/or monthly newsletter from the COMPANY; the COMPANY *believes in only sending communications when it has something of importance to send*
- Provide SUBSCRIBER access to the requested content from the COMPANY;

PERSONAL DATA submitted voluntarily by the SUBSCRIBER is held:

- Within the COMPANY’S WordPress SITE and database;

- Until the SUBSCRIBER requests to be unsubscribed. Before removal the COMPANY will ask SUBSCRIBER to confirm that he or she wants to remain within the database.

#### LEGAL BASIS FOR USE OF INFORMATION

The COMPANY is legally processing SUBSCRIBER'S PERSONAL DATA based on the following:

- The SUBSCRIBER has given his or her explicit and voluntary consent to the COMPANY;
- The COMPANY has a legitimate interest to process SUBSCRIBER'S PERSONAL DATA;

#### USE TO THIRD PARTIES

PERSONAL DATA is never sold, leased, or shared with any third parties. *A third party is a COMPANY outside of the SUBSCRIBER – COMPANY relationship.*

#### USE LEGAL OBLIGATIONS

The COMPANY may disclose SUBSCRIBER information in special cases when required by legal and or law enforcement and *only* when required by law.

If the COMPANY has reasonable reason(s) to believe that disclosing PERSONAL DATA held by the COMPANY is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference (either intentionally or unintentionally) with the COMPANY'S rights or property, other users of the SITE, and or anyone else that could be harmed by such activities, then the COMPANY will work with the appropriate and legitimate law enforcement and or legal authorities to make sure that the PERSONAL DATA is handled in accordance with the applicable laws.

#### SUBSCRIBERS RIGHTS

As a subscriber and or user of the SITE, you have the following rights:

- Transparent information from the COMPANY regarding how they communicate and interact with the SUBSCRIBER;
- The right to hear back from the COMPANY regarding any inquiry into SUBSCRIBER'S PERSONAL DATA;
- To request correction of PERSONAL DATA from the COMPANY;
- Access to SUBSCRIBER'S PERSONAL DATA including knowing the purposes that the data is used for;
- To request erasure from the COMPANY'S records provided that there are not overriding legal, public interest, or legitimate interests;
- To a restriction on the processing of the PERSONAL DATA;
- Data portability of PERSONAL DATA (having a record provided to you that is readable and commonly used that outlines the PERSONAL DATA the COMPANY has on you)
- To object to processing of PERSONAL DATA – the COMPANY shall no longer process the SUBSCRIBER'S PERSONAL DATA unless the COMPANY demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the SUBSCRIBER or for the establishment, exercise or defense of legal claims.

- To file a complaint with the supervisory authority;
- The right to unsubscribe at any time (withdraw consent)

#### PROFILING PERSONAL DATA

*Profiling* means any form of automated processing of PERSONAL DATA consisting of the use of PERSONAL DATA to evaluate certain personal aspects relating to a SUBSCRIBER, in particular to analyze or predict aspects concerning that SUBSCRIBER'S performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements;

#### CHILDREN UNDER AGE 13

The COMPANY recognizes the special obligation to protect PERSONAL DATA obtained from children age 13 and under.

IF YOU ARE 13 YEARS OLD OR YOUNGER, THE COMPANY REQUESTS THAT YOU NOT SUBMIT ANY PERSONAL INFORMATION TO THE SITE OR TO THE COMPANY.

If the COMPANY discovers that a child age 13 or younger has signed up on the SITE and or provided the COMPANY with PERSONAL DATA, the COMPANY will delete that child's PERSONAL DATA from our records.

The COMPANY nonetheless encourages parents to go online with their kids. Here are a few tips to help make a child's online experience safer:

1. Teach kids never to give personal information, unless supervised by a parent or responsible adult.

Includes name, address, phone, school, etc.

2. Know the sites your kids are visiting and which sites are appropriate.
3. Look for Website privacy policies. Know how your child's information is treated.
4. Check out the Federal Trade Commission's (FTC) site for more tips on protecting children's privacy online.

#### USE OF COOKIES

Cookies are pieces of information that a website transfers to an individual's computer hard drive for record keeping purposes. *Cookies make using the COMPANY'S SITE easier by saving your passwords and preferences for you.*

These cookies are restricted for use only on COMPANY'S SITE, and do not transfer any PERSONAL DATA to any other party. Most browsers are initially set up to accept cookies. You can, however, reset your browser to refuse all cookies or indicate when a cookie is being sent. Please consult the technical information relevant to your browser for instructions.

If you choose to disable your cookies setting or refuse to accept a cookie, some parts of the SITE may not function properly or may be considerably slower.

#### MALWARE/SPYWARE/VIRUSES

Neither the COMPANY nor the SITE knowingly permit the use of malware, spyware, viruses, and/or other similar types of software.

#### LINKS TO EXTERNAL SITES

The COMPANY is not responsible for the content or practices of third-party websites that may be linked to the SITE.

The COMPANY is also not responsible for any information that you might share with such linked websites.

You should refer to each website's respective privacy policy and practices prior to disclosing any information.

#### BULLETIN BOARDS AND CHAT AREAS

Guests of the SITE are solely responsible for the content of messages they post on the COMPANY'S forums, such as chat rooms and bulletin boards. Users should be aware that when they voluntarily disclose personal information (e.g., user name, e-mail address, phone number) on the bulletin boards or in the chat areas, that information can be collected and used by others and may result in unsolicited messages from other people. You are responsible for the personal information you choose to submit in these instances. Please take care when using these features.

#### OPT OUT OR REMOVAL OF YOUR INFORMATION

The SITE provides the SUBSCRIBER the opportunity to opt-in to receive communications from the COMPANY at the point(s) where PERSONAL DATA information is required to be voluntarily entered by the SUBSCRIBER.

The SUBSCRIBER *always has the option of removing their PERSONAL DATA from any communications list in order to discontinue any such future communications.*

In order to ensure immediate removal from any list, please follow the specific instructions set forth within the communications you receive from the COMPANY, which you no longer wish to receive.

If you are unsuccessful in completing the instructions specified in any such communication, please email the COMPANY at sales@xl-engineering.com and simply request to unsubscribe.

- Unsubscribe from all communications from the COMPANY
  
- Unsubscribe from a specific set of communications from the COMPANY

#### CONTACT INFORMATION

If you have any complaints or concerns about the COMPANY or about this privacy statement, please contact:

Via email: sales@xl-engineering.com

or

Via regular mail:

6960 Hammond Ave SE Dutton, MI 49316

Information provided by you via general email inquiries to the COMPANY such as your email address is used only to respond to your inquiries in the ordinary course of business and is never shared with third parties.

#### SECURITY

Security for all PERSONAL DATA is extremely important to the COMPANY.

Unfortunately, no data transmission over the internet can be guaranteed to be 100% secure.

As a result, while the COMPANY strives to protect SUBSCRIBER'S PERSONAL DATA, the COMPANY cannot ensure or warrant the security of any PERSONAL DATA the SUBSCRIBER transmits via the internet. By transmitting any such information to the COMPANY, SUBSCRIBER accepts that he or she does so at their own risk.

#### TRANSFER OF CUSTOMER INFORMATION

Customer lists and information are properly considered assets of a business. If COMPANY merges with another entity, or if it sells its assets to another entity, the COMPANY'S customer list and information would be included among the assets transferred.

- SUBSCRIBER would be given the opportunity to unsubscribe both before and after the sale.

#### YOUR ACCEPTANCE OF THESE TERMS

By using the SITE, the SUBSCRIBER accepts the policies and restrictions set forth in this Online Privacy Policy. If you do not agree to this policy, please do not use the SITE. This Online Privacy Policy may be revised from time to time by updating this posting. You are bound by any such revisions and should therefore periodically visit this page to review the then current Online Privacy Policy to which you are bound.