

# The Zidian G R O U P



## PRIVACY POLICY

*Last updated August 2023*

### 1. Zidian Manufacturing, Inc. Values Your Privacy

This "Privacy Policy" outlines how your personally identifiable information (your "Visitor Information") may be collected, used, and shared in connection with your access to and/or visitation or use of the following sites (collectively referred to herein as the "Site"):

[www.summergardenfood.com](http://www.summergardenfood.com)  
[www.giarussa.com](http://www.giarussa.com)  
[www.ghughessugarfree.com](http://www.ghughessugarfree.com)  
[www.littleitalybronxsauce.com](http://www.littleitalybronxsauce.com)

Additionally, this Privacy Policy outlines how your Visitor Information may be collected, used, and shared in the event that we may collect information through any third-party application or third-party sites, social networks, or social media sites (such as Facebook, Instagram, etc., collectively "Applications"). This Privacy Policy also describes your choices and rights regarding the use, access, and correction or deletion of your Visitor Information. By visiting our Site, you consent to the use of your Visitor Information in accordance with this Privacy Policy. You may also be asked to provide clear and unequivocal affirmative consent to the collection, processing, and sharing of your Visitor Information via opt-in procedures.

This Site is owned and operated by Zidian Manufacturing, Inc. (herein referred to as "The Zidian Group", "Zidian", "we", "us", or "our"), and this Privacy Policy only applies to Visitor Information obtained by The Zidian Group in connection with or related to your use of the Site. This Privacy Policy does not apply to information collected by us offline or through other means, including on any other website operated by us or any third party (including our affiliates and subsidiaries), including through any Application or content (including advertising) that may link to or be accessible from, or on, our Site. **Please read this Privacy Policy carefully to understand our policies and practices regarding your personal information and how we will treat it. By accessing or using this Site you agree to this Privacy Policy. This Privacy Policy may change from time to time and your continued use of this Site means that you are consenting to be bound by the most recently updated version of this Privacy Policy.**

### 2. Data Collection

## **General Information We Collect and How We Use It**

We collect Visitor Information when you use our Site. Sometimes you may submit it to us yourself, other times it may be collected automatically. Our handling of your Visitor Information is generally limited to client support and handling and resolving general inquiries. You are not required to provide The Zidian Group the personal data that we request, but if you choose not to do so, we may not be able to provide you with our services, or with a high quality of service or respond to any inquiries you may have.

### **Information Collected When You Use Our Site**

Your Visitor Information may be collected, used, and shared. As detailed below, the type of Visitor Information collected may vary based on how it was gathered, but may include, among other things, your name, email address, address, phone number, and other information that you voluntarily submit (e.g., when you complete any contact forms on the Site), information automatically collected about your usage of our Site that does not include personally identifiable information (e.g., the content that you choose to view and how you interact), and information about you that third parties may share with us if such third parties have previously received your consent to do so. In general, your Visitor Information means any information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household or device. It does not include (i) publicly available information from government records; (ii) de-identified or aggregate information; or (iii) certain other personal data protected by other sector-specific state or federal laws.

Moreover, we automatically collect certain information when you visit, use or navigate the Site. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your Internet Protocol (IP) address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our and other technical information. This information is primarily needed to maintain the security and operation of our Site, and for our internal analytics and reporting purposes.

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Policy.

The Zidian Group does not collect or process any data on the Site regarding the following: race or ethnic origin; political opinions; religious or philosophical beliefs; trade union memberships; genetic or biometric data; health or mortality; or sexual orientation.

We collect several categories of information from and about users of our Site, including:

- **Identity and Contact Information** – We collect or use this information, including your first name and last name, phone number, address and email address.
- **Technical Data and Unique Device Identifiers** – We collect IP addresses, operating system information, links clicked, pages visited, browser type, time zone setting, browser plug-in types, and referring websites of visitors to our Site (when possible).
- **Non-Identifying Information** – We collect information that is about you but does not individually identify you, such as aggregate information about pages visited, length of time spent on our Site and its webpages, etc.

On our Site, we collect your Visitor Information through various means, including through:

- Inquiries from any contact forms;
- Employment applications;
- Product location searches;
- Social media plugins; and
- Web-tracking and website analytics technologies, such as cookies and web beacons.

### **Voluntary Submission**

The Zidian Group may collect Visitor Information that is voluntarily provided by you or with your permission. For example, we may ask you for information, such as your name, phone number, address and e-mail address when you contact us. All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information. You always have the option not to provide the information we request. If you choose not to provide the information we request, you can still visit the Site, but you may be required to provide your information by other means if we need such information to provide our services to you.

### **Our Third-Party Vendors**

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the Visitor Information collected to track and examine the use of this Site, to prepare reports on its activities and share them with other Google Services. You can access Google's privacy policy here: <https://policies.google.com/privacy>.

### **Web Beacons**

Our web pages may contain electronic images known as web beacons (invisible images often referred to as pixel tags or clear GIFs) on the Site in order to recognize users, assess traffic patterns, identify preferred content, and measure Site engagement. We may also include web beacons in our e-mail messages in order to count how many e-mail messages have been opened, for example.

Some of these web beacons may also be placed by third-party service providers to help determine the effectiveness of advertising campaigns. These web beacons may be used by third-party service providers to place a persistent cookie on your computer. This allows the service provider to recognize your computer each time you visit certain web pages and compiles anonymous information in relation to those page views, which in turn enables us and our third-party service providers to learn which advertisements bring you to our website and how you use the Site.

### **Log Files**

Our servers log information about your IP address, your browser type, and the current URL you are requesting. This information is always provided by your browser and automatically logged. These log files are stored in a secure location and used in our internal analysis of traffic patterns.

### **Cookies and Similar Tools**

Like many businesses, we also collect information through cookies and similar technologies. A cookie is a small data file that is written to a computer's hard drive by a web browser. A cookie file can contain and/or automatically collect information, such as a user identification code or IP address that a website will use to track

the pages and number of times you have visited. The data read from these cookies may be linked to personally identifying (PII) and non-personally identifying (non-PII) information. We may collect and use non-PII to help us improve our services, customize your experience and analyze use of our services. This Privacy Policy does not limit our use or disclosure of collected non-PII. We reserve the right to collect, use and disclose such non-PII to our partners, advertisers and other third parties at our sole discretion.

We and our partners may use cookies and similar technologies on the Site to personalize and optimize your browsing experience by: providing you tailored content, enabling social media features, safeguarding against spam and malware, analyzing trends, traffic, and user behavior, administering the website, gathering demographic information about our user base as a whole, tracking web and advertising analytics throughout the Site, remembering preferences and voluntarily-submitted information (e.g. name, email), performing location-related functionalities and analytics, participating in market research (e.g., website ratings), and educating The Zidian Group about how the Site can continue to be improved. You may turn off cookies in your browser or have your browser warn you before accepting cookies. If you choose to turn off cookies, you may not be able to experience all of the features on our Site.

Cookies fall into the subcategories below.

**Essential Cookies.** Certain cookies are used for specific purposes that are essential to your secure use and navigation of the Site. Without them, The Zidian Group may not be able to provide core Site functions and features to you, and the Site would not operate as well as you or Zidian would like. These cookies collect and use information such as your server preferences, single-session data and corresponding identifier, web beacons and log files, and other credential-related information. Essential cookies also help inform The Zidian Group whether you require, or have already been served, an affirmative consent request in connection with our data policies. Essential cookies also include analytics cookies, which provide us data that allows The Zidian Group to better understand its users and improve the Site based on what we have learned from that data.

**Preference Cookies.** Other cookies are used to collect and process information about your preferences and similar choices in connection with the Site in order to optimize your browsing experience. Preference cookies include social media cookies, which collect information about your social media usage and other data you may have provided in connection with such usage (if you access the Site through a social media website or mobile application, you may have social media cookies). If you wish to modify or change your social media cookies, please visit the appropriate social media website and review the settings related to your applicable social media account(s).

**Advertising Cookies.** To help support the Site and further tailor your experience, The Zidian Group and certain of our third-party providers may also use cookies on the Site to personalize the content you may be shown. Some advertisements may use advertising cookies to provide targeted advertisements that may be more consistent with your interests than non-targeted advertisements. The Zidian Group does not provide user information to third parties except in connection with the Site or as required by law.

## **Analytics**

Services providing analytic tools (“Analytic Services”), including without limitation Google Analytics®, may be used with the Site which transmit website traffic data to servers in the United States. Analytic Services do not collect personal information, identify individual users, or associate your IP address with any other data. We do not share any personally identifiable information with our Analytic Services in connection with their performing of any services on our Site. We use reports provided by Analytic Services to help us understand website traffic and webpage usage. Each of these services has their own privacy policy that you should refer to.

## **Third-Party Websites**

The Site may contain links to websites not owned or controlled by The Zidian Group. We do not have any control over these third-party websites and do not endorse them. We encourage you to be aware of third-party websites and their privacy policies, as we are not responsible for privacy policies or practices of third-party websites. Please review the privacy policy of each website you visit before you submit any personal information to any of these websites.

### **3. Data Usage**

#### ***Use of Your Information***

We collect, process and disclose your Visitor Information only for specific and limited purposes. For example, to respond to inquiries received from the use of any contact forms on the Site and to develop and improve our services, communication methods and the functionality of our Site.

Our primary goal in collecting, using, and sharing Visitor Information is to enhance your experience on the Site, support the Site, and improve its features, performance, and other elements. We will not use your Visitor Information without a valid legal basis to do so, and we will only process your Visitor Information in a way that is compatible with and relevant to the purpose for which it was collected and authorized.

Your Visitor Information may be used for the purposes outlined below.

#### **To Facilitate and Improve Our Services**

To respond to general inquiries and to provide customer support when needed, we collect and/or use Visitor Information, including your first and last name, phone number, address and email address. Additionally, your Visitor Information may be used to present the Site and its content to you, request feedback, and for any other purpose with your consent.

#### **To Provide Communications to You**

From time to time, we may provide e-mails highlighting new features, promotions, or content on the Site to those users who have expressly provided us with their permission to send such communications. For instance, we may communicate with you by email in response to your inquiries or send you service-related announcements based on Visitor Information you provide to us. We may also use your Visitor Information to send you updates and other promotional communications with your consent. If you no longer wish to receive email updates, you may opt-out at any time by following the instructions included in each communication (usually in the form of an “unsubscribe” link), or email us at [ConsumerRelations@TheZidianGroup.com](mailto:ConsumerRelations@TheZidianGroup.com) to update your personal contact preferences. Note that unsubscribing from our emails will not prevent you from receiving transactional emails relating to support or service requests.

#### **As Necessary to Provide Information or Services**

We may occasionally hire other companies to provide limited services on our behalf, such as handling the processing of information submitted on any contact form on the Site, the delivery of any mailings or correspondence, or performing statistical analysis of our services (the “Provided Services”). We provide those companies the information they need to deliver the service. In some instances, these companies may collect information directly from you and you will be notified of the involvement of the external service provider. Such companies are subject to agreements that require them to maintain the confidentiality of your information and they are prohibited from using that information for any other purpose. We reserve the right to not track how you interact with any of the Provided Services.

#### **Sharing of Information**

You may be requested to voluntarily provide certain Visitor Information during your use of our Site. If you choose to do so, that Visitor Information may be shared across and with The Zidian Group and its affiliates as well as business partners and vendors providing hosting and other web-based services for Zidian.

The Zidian Group may use third parties to provide e-mail messaging, text messaging, account management and hosting services for the Site. When you sign up for services, we will share your Visitor Information as necessary for the third party to provide that service. These third parties are prohibited from using your Visitor Information for any other purpose. If you do not want your information to be shared, you can choose not to allow the transfer of your information by not using that particular service.

### **In the Event of Change in Ownership or Control**

The ownership or control of the Site may change at some point in the future. Should that occur, we want this Site and/or The Zidian Group to be able to maintain a relationship with you. In the event of a change in ownership, merger, bankruptcy or change in control of The Zidian Group, your information may be shared with the person or business that owns or controls this Site. You will be notified as described below in "Changes to Privacy Policy." Opting out of receiving information from third parties will not affect our right to transfer your information to a new owner, but your choices will continue to be respected regarding the use of your information.

### **As Required By Law**

The Zidian Group may disclose your personal information if required to do so by law, such as to comply with a subpoena or in the good faith belief that such action is necessary to conform to the edicts of the law, investigate fraud or comply with a judicial proceeding, court order, or legal process served on Zidian, or to protect and defend the rights or property of The Zidian Group.

### **Legal Bases for Data Usage/Disclosure**

The Zidian Group will not process your Visitor Information without a lawful basis to do so. In general, Zidian will process your Visitor Information on any of the following legal bases:

- **Consent** – We may process your data if you have given us specific consent to use your personal information for a specific purpose.
- **Legitimate Interests** – We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- **Performance of a Contract** – Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.
- **Legal Obligations** – We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests** – We may disclose your information where we believe the processing is necessary in order to protect your vital interests or those vital interests of another natural person.

More specifically, we may need to process your data or share your personal information in the following situations:

- **Business Transfers** – We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

When we collect and use your personal data for the purposes mentioned above or for other purposes, we will inform you before or at the time of collection. Where appropriate, we will ask for your consent to process your Visitor Information. Where you have given consent for processing activities, you have the right to withdraw your consent at any time.

#### **4. Data Protection**

##### ***How We Protect Your Information***

The Zidian Group takes the security of your Visitor Information very seriously. We take every effort to protect your personal information from misuse, interference, loss, unauthorized access, modification or disclosure. Our measures include implementing appropriate access controls, investing in the latest information security capabilities to protect the IT environments we leverage, and ensuring we encrypt and anonymize personal data wherever possible. Access to your Visitor Information is only permitted among our employees and agents on a need-to-know basis and subject to strict contractual confidentiality obligations when processed by third parties.

Your information may be stored on servers owned and operated by The Zidian Group and its affiliates or by cloud/software service providers (“SaaS Services”) located in the United States. Our SaaS Services are committed to: (i) using industry-standard physical, electronic, and organizational safeguards to protect information against loss or theft as well as unauthorized access and disclosure; (ii) protecting individuals’ privacy; and (iii) employing security techniques to protect such data from unauthorized access. We follow generally accepted industry standards to protect the Visitor Information submitted to us, both during transmission and once we receive it. When entering Visitor Information on the Site, look for the secure icon (typically an image of a lock) and ‘https’ designation in the address box of your browser window that indicates you are on a secure page.

However, it must be noted that “perfect security” does not exist today. If you are concerned that your privacy may have been breached, please contact us using the contact information provided at the bottom of this Privacy Policy.

#### **5. Data Retention**

##### ***How Long We Keep Your Information***

We will only keep your Visitor Information for as long as it is necessary for the purposes set out in this Privacy Policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this policy will require us to keep your personal information for longer than reasonably necessary.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible. We will actively review the personal data we hold and delete it securely, or in some cases, anonymize it when there is no longer a legal, business, or consumer need for it to be retained.

#### **6. Privacy Rights and Considerations**

##### **Third-Party Policies**

You should review the privacy policies of any third parties before you provide any personal information or complete any transaction with such parties. Please contact each third-party provider directly if you have any questions about their privacy policies or the information they require for you to complete any transaction.

## **Children's Online Privacy Information**

### **CHILDREN'S ONLINE PRIVACY PROTECTION ACT ("COPPA") NOTIFICATION**

Our Site is not designed for persons under the age of thirteen ("13"). We are not responsible for any access or use of the Site by children or minors under the age of 13. No one under age 13 may provide any personal information to or on our Site. 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 Site or through any of their features, use any of the interactive features of our Site, or provide any information about yourself to us, including your name, address, telephone number or email 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 the age of 13, please contact us as outlined below.

By using the Site, you represent that you are at least 18 years of age.

### **Residents of the European Union**

The Zidian Group does not actively target or market to any EU member state and does not, to its knowledge, process or control any EU citizen personally identifiable information. Despite this fact, this Privacy Policy and its enumerated policies are intended to comply with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (the "General Data Protection Regulation" or "GDPR") and provide appropriate protection and care with respect to the treatment of all of our visitor's information in accordance with the GDPR.

If you are a resident of the EU, you have specific rights concerning your Visitor Information under the GDPR as outlined in more detail below. Further information and advice about your rights can be obtained from the data protection regulator in your country.

If you are a resident of the EU, under GDPR, you have the right to:

- Request Zidian allow you to access the personal data belonging to you that it processes;
- Request Zidian change or modify the data it processes about you when you believe the data is inaccurate;
- Request Zidian erase any personal information about you that it has collected;
- Request Zidian restrict the processing of your personal information under certain conditions;
- Request Zidian deliver the personal data it holds about you in a commonly used format and request that such data be transmitted to another controller;
- Request Zidian cease processing your personal data through an objection; and
- Request Zidian not subject you to a decision based solely on automated processing.

If you are a resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en#member-pl](https://edpb.europa.eu/about-edpb/about-edpb/members_en#member-pl).

If you are a resident in Switzerland, the contact details for the data protection authorities are available here: <https://www.edoeb.admin.ch/edoeb/en/home.html>.

If you would like to exercise your rights under GDPR, you may contact The Zidian Group as outlined below under the section for "Contacting Data Controller."

### **Residents of California**



If you are a resident of California, under the California Consumer Privacy Act and California Privacy Rights Act (collectively, "CCPA"), you have the right to:

- Request Zidian to disclose the categories and specific information that it has collected about you;
- Request Zidian to delete any personal information about you that it has collected;
- Request Zidian not to share your personal information at any time (the "right to opt-out");
- Request Zidian to correct any inaccurate personal information it maintains about you; and
- Request Zidian to restrict its use and disclosure of your sensitive personal information.

If you would like to exercise your rights under the CCPA, you may contact The Zidian Group as outlined further below. Zidian may not discriminate against you if you exercise any of your rights under the CCPA.

### **Residents of Colorado**

If you are a resident of Colorado, under the Colorado Privacy Act ("CPA"), you have the right to:

- Request Zidian to allow you to opt-out of data processing for targeting advertising, sale or profiling using your personal data;
- Request Zidian to grant you access to any data that we have collected about you;
- Request Zidian to correct any data that we have collected about you that is incorrect or outdated;
- Request Zidian to delete any data collected about you that we hold; and
- Request Zidian to provide your data in a format that allows it to be transferred to another entity.

If you would like to exercise your rights under the CPA, you may contact The Zidian Group as outlined further below.

### **Residents of Connecticut**

If you are a resident of Connecticut, under the Connecticut Data Privacy Act ("CTDPA"), you have the right to:

- Request Zidian to confirm whether we are processing your personal data, and to provide access to any such data we may process about you;
- Request Zidian to provide you with a copy of your personal information in a portable and readily usable format;
- Request Zidian to correct any inaccuracies in any personal data we hold about you;
- Request Zidian to delete personal data that is provided by, or obtained about, you; and
- Request Zidian to allow you to opt-out of the processing of your personal data for purposes of targeted advertising, the sale of your personal data, and profiling in furtherance of solely automated decisions that produce significant effects.

If you would like to exercise your rights under the CTDPA, you may contact The Zidian Group as outlined further below.

### **Residents of Utah**

If you are a resident of Utah, under the Utah Consumer Privacy Act (“UCPA”), you have the right to:

- Request Zidian to grant you with access to the personal data we hold about you;
- Request Zidian to delete your personal data that you have provided to us;
- Request Zidian to provide you with a copy of your personal data that you have provided to us in a format that is portable, readily usable and transferable;
- Request Zidian to allow you to opt-out of the processing of your personal data for the purposes of targeted advertising, or the sale of your personal data.

If you would like to exercise your rights under the UCPA, you may contact The Zidian Group as outlined further below.

### **Residents of Virginia**

If you are a resident of Virginia, under the Virginia Consumer Data Privacy Act (“VCDPA”), you have the right to:

- Request Zidian to confirm whether we process your personal data, and to allow you with access to any such data;
- Request Zidian to delete any of your personal data that we hold;
- Request Zidian to correct any inaccuracies in the personal data we hold about you;
- Request Zidian to provide the data we hold about you in an easy, portable form for transferability;
- Request Zidian to allow you to opt-out of the processing of your personal data for targeted advertising;
- Request Zidian to allow you to opt-out of the sale of your personal data; and
- Request Zidian to allow you to opt-out of profiling based upon your personal data.

If you would like to exercise your rights under the VCDPA, you may contact The Zidian Group as outlined further below. Zidian may not discriminate against you if you exercise any of your rights under the VCDPA.

### **Residents of Texas**

If you are a resident of Texas, under the Texas Data Privacy and Security Act (“TDPSA”), you have the right to:

- Request Zidian to confirm whether we process your personal data, and to allow you with access to any such data;
- Request Zidian to correct any inaccuracies in the personal data we hold about you;
- Request Zidian to delete any of your personal data that we hold;
- Request Zidian to provide the data we hold about you in a readily usable, portable form for transferability;
- Request Zidian to allow you to opt-out of the processing of your personal data for targeted advertising;
- Request Zidian to allow you to opt-out of the sale of your personal data; and
- Request Zidian to allow you to opt-out of profiling based upon your personal data.

If you would like to exercise your rights under the TDPSA, you may contact The Zidian Group as outlined further below. Zidian may not discriminate against you if you exercise any of your rights under the TDPSA.

### **Residents of Iowa**

If you are a resident of Iowa, under the Iowa Consumer Data Protection Act (“IACDPA”), you have the right to:

- Request Zidian to confirm whether we process your personal data, and to allow you with access to any such data;
- Request Zidian to delete any of your personal data that we hold;
- Request Zidian to provide the data we hold about you in a readily usable, portable form for transferability; and
- Request Zidian to allow you to opt-out of the sale of your personal data.

If you would like to exercise your rights under the IACDPA, you may contact The Zidian Group as outlined further below. Zidian may not discriminate against you if you exercise any of your rights under the IACDPA.

### **Residents of Indiana**

If you are a resident of Indiana, under the Indiana Consumer Data Protection Act (“INCDPA”), you have the right to:

- Request Zidian to confirm whether we process your personal data, and to allow you with access to any such data;
- Request Zidian to delete any of your personal data that we hold;
- Request Zidian to correct any inaccuracies in the personal data we hold about you;
- Request Zidian to provide the data we hold about you in a readily usable, portable form for transferability;
- Request Zidian to allow you to opt-out of the processing of your personal data for targeted advertising;
- Request Zidian to allow you to opt-out of the sale of your personal data; and
- Request Zidian to allow you to opt-out of profiling based upon your personal data.

If you would like to exercise your rights under the INCDPA, you may contact The Zidian Group as outlined further below. Zidian may not discriminate against you if you exercise any of your rights under the INCDPA.

### **Residents of Oregon**

If you are a resident of Oregon, under the Oregon Consumer Privacy Act (“OCPA”), you have the right to:

- Request Zidian to confirm whether we process your personal data and the categories of any data and to allow you with access to any such data;
- Request Zidian to delete any of your personal data that we hold;
- Request Zidian to inform you of any specific third parties to which we have disclosed your personal data;
- Request Zidian to correct any inaccuracies in the personal data we hold about you;
- Request Zidian to provide the data we hold about you in a readily usable, portable form for transferability;
- Request Zidian to allow you to opt-out of the processing of your personal data for targeted advertising;
- Request Zidian to allow you to opt-out of the sale of your personal data; and
- Request Zidian to allow you to opt-out of profiling based upon your personal data.

If you would like to exercise your rights under the OCPA, you may contact The Zidian Group as outlined further below. Zidian may not discriminate against you if you exercise any of your rights under the OCPA.

### **Residents of Montana**

If you are a resident of Montana, under the Montana Consumer Data Privacy Act (“MCDPA”), you have the right to:

- Request Zidian to confirm whether we process your personal data, and to allow you with access to any such data;
- Request Zidian to delete any of your personal data that we hold;
- Request Zidian to correct any inaccuracies in the personal data we hold about you;
- Request Zidian to provide the data we hold about you in a readily usable, portable form for transferability;
- Request Zidian to allow you to opt-out of the processing of your personal data for targeted advertising;
- Request Zidian to allow you to opt-out of the sale of your personal data; and
- Request Zidian to allow you to opt-out of profiling based upon your personal data.

If you would like to exercise your rights under the MCDPA, you may contact The Zidian Group as outlined further below. Zidian may not discriminate against you if you exercise any of your rights under the MCDPA.

### **Residents of Tennessee**

If you are a resident of Tennessee, under the Tennessee Information Protection Act (“TIPA”), you have the right to:

- Request Zidian to confirm whether we process your personal data, and to allow you with access to any such data;
- Request Zidian to delete any of your personal data that we hold;
- Request Zidian to correct any inaccuracies in the personal data we hold about you;
- Request Zidian to provide the data we hold about you in a readily usable, portable form for transferability;
- Request Zidian to allow you to opt-out of the processing of your personal data for targeted advertising;
- Request Zidian to allow you to opt-out of the sale of your personal data; and
- Request Zidian to allow you to opt-out of profiling based upon your personal data.

If you would like to exercise your rights under the TIPA, you may contact The Zidian Group as outlined further below. Zidian may not discriminate against you if you exercise any of your rights under the TIPA.

### **Residents of Florida**

If you are a resident of Florida, under the Florida Digital Bill of Rights (“FDBR”), you have the right to:

- Request Zidian to confirm whether we process your personal data, and to allow you with access to any such data;
- Request Zidian to delete any of your personal data that we hold;
- Request Zidian to correct any inaccuracies in the personal data we hold about you;
- Request Zidian to provide the data we hold about you in a readily usable, portable form for transferability;
- Request Zidian to allow you to opt-out of the processing of your personal data for targeted advertising;
- Request Zidian to allow you to opt-out of the sale of your personal data;
- Request Zidian to allow you to opt-out of profiling based upon your personal data; and
- Request Zidian to allow you to opt- out of the collection of personal data collected through voice or facial recognition;
- Request Zidian to opt-out of the collection of sensitive personal data.

If you would like to exercise your rights under the FDBR, you may contact The Zidian Group as outlined further below. Zidian may not discriminate against you if you exercise any of your rights under the FDBR.

### **Residents of Nevada**

Nevada residents who wish to exercise their sale opt-out rights under Nevada Revised Statutes Chapter 603A may submit a request by emailing us at [ConsumerRelations@TheZidianGroup.com](mailto:ConsumerRelations@TheZidianGroup.com). However, please know we do not currently sell data triggering that statute's opt-out requirements.

### **Residents of Canada**

If you are a resident of Canada, under the Personal Information Protection and Electronic Documents Act ("PIPEDA"), you have the right to:

- Request Zidian to provide you with access to the personal information we hold about you;
- Request Zidian to correct any inaccurate or outdated personal information we hold about you;
- Request Zidian to delete any inaccurate personal information we hold about you; and
- Request Zidian to withdraw your consent to any activities for which you have previously consented.

When we collect information from you, you may inform us if you do not wish to be contacted for marketing/market research purposes in accordance with Canadian Anti-Spam Legislation. If you do not want to receive promotional information from us or our representatives, please use the unsubscribe option in your user account or the email you received, or email us at [ConsumerRelations@TheZidianGroup.com](mailto:ConsumerRelations@TheZidianGroup.com) to update your personal contact preferences.

If you would like to exercise your rights under the PIPEDA, you may contact The Zidian Group as outlined further below.

### **Residents of Mexico**

If you are a resident of Mexico, under the Federal Law on the Protection of Personal Data Held by Private Parties ("FDPL") and the Regulations of the Federal Data Protection Law ("FDPL Regulations"), you have the right to:

- Request Zidian allow you to access the personal data belonging to you that it processes;
- Request Zidian change or modify the data it processes about you when you believe the data is inaccurate;
- Request Zidian erase any personal information about you that it has collected;
- Request Zidian restrict the use and disclosure of your personal information;
- Request Zidian cease processing your personal data through an objection; and
- Request Zidian to withdraw your consent to process personal data.

If you would like to exercise your rights under the FDPL Regulations, you may contact The Zidian Group as outlined further below.

## **7. Revisions and Updates**

### ***Changes to Privacy Policy***

We may update this privacy notice from time to time as necessary to reflect customer feedback, changes in our services, and changes in the law. The updated version will be indicated by a revised "Last updated" date and the updated version will be effective as soon as it is accessible.

If we make any material changes to this Privacy Policy, we will notify you by means of a notice on this Site prior to the change becoming effective. We reserve the right to amend this Privacy Policy at our discretion and at any time. We encourage you to periodically review this page for the latest information on our privacy practices and to review our most current Privacy Policy. Your continued use of our Site following the posting of changes constitutes your acceptance of such changes.

## **8. Contact**

### ***Contacting Data Controller***

To request to review, update, delete your personal information, or exercise any of your rights in accordance with this Privacy Policy, or if you have any additional questions regarding this Privacy Policy or how to remove or modify your user information or related consents, please feel free to contact us by the e-mail or the mailing address below:

ZIDIAN MANUFACTURING, INC.  
500 MCCLURG RD  
BOARDMAN, OH, 44512, UNITED STATES  
By Email: [ConsumerRelations@TheZidianGroup.com](mailto:ConsumerRelations@TheZidianGroup.com)

The Zidian Group will use commercially reasonable efforts to promptly respond and resolve any problem or question.

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