This Privacy Policy describes how Flushmate LLC treats information about you that Flushmate collects and receives through this website, www.flushmate.com, and Flushmate's other websites and online locations, including web applications, mobile applications and social media (collectively, the "**Sites**") and through other interfaces with and aspects of Flushmate's business, including offline. This Privacy Policy together with the Terms of Use governs your use of the Sites and Flushmate's collection, use and disclosure of your information both through the Sites and offline.

This Privacy Policy together with the Terms of Use, governs your use of the Sites and Sloan Marketplace, Flushmate's collection, use, and disclosure of your information both through the Sites and offline.

Please note that while this Privacy Policy also describes how Flushmate collects and treats information about you in connection with the subscription services for Flushmate Internet of Things (IOT) restroom products, the Flushmate Terms of Use (referenced above) are not applicable to and do not govern the use of these subscription services, the associated IOT product software or the use of the Flushmate Application Programming Interface (API)for such products and services, as these products and services are governed by their own respective and independent terms of service, use and purchase, as applicable. The Sites and Sloan Marketplace are referred to together throughout this Privacy Policy as the "Services". Flushmate acts as a Data Controller of the personal data collected and processed regarding customers, trial participants, suppliers, and Site visitors.

1. Acceptance of Privacy Policy

Each time you access, use, register with, or browse the Sites, or provide information to Flushmate online or offline, you signify your acceptance of Flushmate's then-current Privacy Policy. If you do not accept this Privacy Policy, you are not authorized to access, use or browse the Sites, or to provide information to Flushmate and must discontinue use of the Sites immediately. If you provide your information to Flushmate offline, the then-current Privacy Policy applies to Flushmate's collection and use of your information.

Chat, messaging, and live support features are also subject to a separate consent that we obtain from you before your conversation begins, as described in the Chat, Messaging, and Live Support Features section below.

This Privacy Policy is subject to be revised or updated from time to time. Accordingly, you should check the Privacy Policy regularly for updates. Should the Privacy Policy be revised, Flushmate will post the changes on the Sites and the new Privacy Policy will be effective immediately upon posting. If Flushmate makes any material changes to the Privacy Policy, in addition to posting the revised Privacy Policy to the Sites, Flushmate will notify you in the manner and to the extent required by law. You can determine when the Privacy Policy was last revised by referring to the "Effective" date at the top of this page.

Material changes and new purposes: We will not apply a revised Privacy Policy retroactively to information we collected under an earlier version. If we decide to use information we have already collected for a materially different purpose, including to develop, train, fine-tune, or otherwise improve artificial intelligence or machine learning models, we will tell you directly before we do so and will obtain your consent where applicable law requires it. A posted update to this Privacy Policy is not by itself sufficient notice of a change of that kind.

2. Types of Information Collected

We may collect personally identifiable information from you including, without limitation, non-public information about you that helps Flushmate identify you.

If you create an account with Flushmate, or make a purchase from Sloan Marketplace, you will need to provide additional information.

We may permit you to interact with social media platforms (such as LinkedIn, Facebook, and Twitter) and other third party platforms, including by using existing login information from a third-party platform to create or login to your account with us on Sloan Marketplace. When you interact with third party platforms through the Sloan Marketplace, we will receive information about you. The information we collect is subject to this Privacy Policy. The information collected and stored by the third party remains subject to the third party's privacy practices, including, without limitation, whether the third party continues to share information with us, the types of information shared, and your choices with regard to what is visible to others on that third-party website or service. We or the third party may allow you to disable or remove the application or feature, in which case we will no longer collect information about you through the application or feature, but we may retain the information previously collected.

The information we collect on or through our Services may include:

Context	Types of Data	Primary Purpose for Collection and Use of Data
User Information	First and last name, birth date, business title, email address, home telephone number, occupation, preferences, and other information that you provide to Flushmate or that is generated through your use of the Sites or interactions with Flushmate that are not otherwise publicly available.	The processing of this information is necessary for contract fulfillment.
User Account Information	Password, account username, order information.	The processing of this information is necessary for contract fulfillment.
Employer Information	Employer name, employer address, office telephone number, mobile telephone number.	The processing of this information is necessary for contract fulfillment.
Payment and purchasing Information	Credit card, debit card and other payment information, billing and shipping information, purchasing and transaction history.	The processing of this information is necessary for contract fulfillment.
General Product information	Information regarding products you purchase from Flushmate Marketplace or products that you contact customer service about (e.g., serial number, fixture manufacturer, date of installation, place of purchase, etc.), information you provide to us when you	The processing of this information is necessary for contract fulfillment.

	register your product online, register in connection with our web or mobile applications.	
Product Usage information	Product settings, adjustments made to products, device usage patterns and frequency data, maintenance and operational status information, environmental data (temperature, humidity, occupancy patterns), device performance and error logs.	The processing of this information is necessary for contract fulfillment.
Cookies and first party tracking	Information regarding your use of the Sites, Sites usage statistics, time stamps, browsing history, information on if you click on Flushmate's ads when you see them.	We have a legitimate interest in processing this information.
Device Information	Unique device identifier of your devices that connect to or access the Sites, type of device, type of computer operating system you use, the type of browser you use, the domain name of your internet service provider.	We have a legitimate interest in processing this information.
Cookies and third party tracking	Information about your browsing and interaction activities on third party social media platforms and other third party platforms, when you use existing login information from a third-party platform to create or login to your account with us on Sloan Marketplace or on sites where our advertisements appear.	We have a legitimate interest in processing this information.
Location Information	Your IP address, general geographic location, information regarding your Internet location when you see Flushmate's ads, location data for installed devices, addresses of the relevant building(s) that you own, lease, manage or service and their restroom facilities (if you are using the subscription services for the remote monitoring and control of Flushmate IOT products).	We have a legitimate interest in processing this information and to use it to improve our products and services.
Website interactions	Certain aggregated or anonymous information regarding users of the Sites such as the age, gender, occupation, zip code, interests, purchase preferences, and language preferences of users of the site, as well as information collected through questionnaires and surveys.	We have a legitimate interest in processing this information.

Non-personally identifiable information	Information collected on our server logs from your browser as well as through other analysis of the Sites.	We have a legitimate interest in processing this information.
Chat and Support Communications	The content of your chat, messaging, and live support conversations, including transcripts, the messages you send and receive, timestamps, the page you were viewing, and any information you enter before or during the conversation.	Processing is based on your consent and our legitimate interest in providing support and keeping records.
Automated Processing, Inferences, and Derived Information	Predictions, scores, segments, and other information that we or our systems generate about you rather than collect from you directly, such as predicted product preferences, audience segments, predicted maintenance needs for connected products, and fraud and security risk indicators.	We have a legitimate interest in processing this information to provide, secure, and improve our products and services. We treat it as personal information under this Privacy Policy. Section 18 describes these activities and the choices available to you.

If you are a current or former employee of Flushmate or an applicant to Flushmate, we may collect information about you in connection with your employment or candidacy. Details of our collection, use and disclosure of such information is available on our Employee and Candidate Privacy Notice which is available on our applicant website and to employees separately.

3. IoT Products and Services

If you make use of any Flushmate IoT products and services, you are subject to additional terms of service that govern device functionality, software licensing, and API usage. IoT-Specific Data Collection. Our connected restroom products may collect additional types of information, including:

- Device usage patterns and frequency data
- Maintenance and operational status information
- Environmental data (temperature, humidity, occupancy patterns)
- Device performance and error logs
- Location data for installed devices.

This information is used to:

- Provide remote monitoring and maintenance services
- Improve product performance and reliability
- Generate usage analytics and reports for facility managers
- Predict maintenance needs and optimize operations

- Ensure compliance with health and safety standards.

IoT Data Sharing: For IoT services, we may share aggregated, anonymized usage data with facility management companies (with customer consent), product development teams for improvement purposes, and third-party maintenance providers (as necessary for service delivery). We do not share personally identifiable information from IoT devices without explicit written consent, except as required by law or for safety purposes. For complete terms governing IoT device functionality and software, please refer to the IoT Terms of Service. In case of conflict between this Privacy Policy and IoT-specific terms regarding data practices, this Privacy Policy governs.

If you are a resident of a US state such as California, Utah, Virginia, Colorado, Connecticut, and others that have enacted laws and regulations that provide additional privacy protections and rights to their resident consumers, you may have additional rights and options with respect to the categories of personally identifiable information that we collect, and those will be noted in Section 13 below. The categories may include identifiers, customer records information, your gender identity, commercial information, internet or other electronic network activity information, geolocation data and information reflecting your preferences and characteristics relevant to your use of our products and services. Except as otherwise indicated, all of this information is collected for the purpose of providing you with the products and services that you wish to receive from us.

We also may collect non-personally identifiable information about you or we may receive certain aggregated or anonymous information regarding users of the Sites. If you sign up to receive our subscription services for Flushmate IOT restroom products, please refer to our Terms of Service applicable to this service for information about what other non-personally identifiable information we collect. "Non-personally identifiable information" refers to information that does not personally identify the individual to whom the information relates, such as information that is aggregated by Flushmate or a third party, or information that is not linked to contact information or other personally identifiable information of an individual.

In the event that any of the non-personally identifiable information that we collect about you is maintained, used or shared in a manner that associates it with your name, contact information or other personally identifiable information, it will be treated as personally identifiable information. If you are logged into your account on the Sites, information such as the content you access, view, click on or search for when on the Sites, the devices from which you access such content and the length of time for which you view same, may become personally identifiable. In such an event, Flushmate will treat such information as personally identifiable information.

4. How We Collect Information

We may collect personally identifiable and/or non-personally identifiable information from you when you:

- Access, use or browse the Sites;
- Purchase products and/or services from the Sites
- Register for an account on the Sites;
- Sign up to receive announcements, emails or newsletters;
- Contact, communicate with or otherwise interact with Flushmate or its personnel via email, the Sites, fax, telephone, or by other means whether online or offline;

- Order or request products, literature, services or other information during your visit to the Sites, via email, fax or other online or offline means;
- Register your product with us;
- Access, use or adjust any product settings or functional parameters;
- Make a product warranty claim;
- Register, enroll or participate in any surveys, questionnaires, promotions, or any other services, events or activities online or offline sponsored by Flushmate or third parties, or offered in connection with the Sites of Flushmate's products or services ("**Activities**").

By using the Sites, or by submitting your personally identifiable information to Flushmate online or offline, you expressly consent to the storage and processing of your personally identifiable information in the United States in accordance with the laws of the United States, or in other jurisdictions.

We may obtain personally identifiable and/or non-personally identifiable information from third parties such as the owners or operators of the websites or applications where our advertisements appear (some of which may partner with Flushmate or with an advertisement network used by Flushmate), our service providers, affiliates, suppliers, vendors, distributors, Activities partners and sponsors, and other sources (e.g., offline records or publicly available information). We may combine personally identifiable information we collect with information that we obtain from these sources. We will treat any such combined information as personally identifiable information.

Flushmate automatically receives and records non-personally identifiable information on our server logs from your browser as well as through other analysis of the Sites. We also may collect information using cookies, web beacons, pixels, gifs, tags or similar technologies ("**Collection Technology**"), or through third parties using similar technologies. Collection Technology may operate as a piece of data stored on your browser or device, or may identify, compile, aggregate and/or collect information through other means. When you visit the Sites, your web browser may use Collection Technology to better enable you to navigate the Sites during your visit and upon your return. You may use the Sites even if you choose to reject or delete certain Collection Technology. Collection Technology also may be used by some of the other websites for which a link is placed on the Sites.

The Sites may use Google Analytics. Google Analytics uses Collection Technology to collect and store anonymous information about you, which may include the non-personally identifiable information described above. You can read Google Analytics' privacy policy at http://www.google.com/intl/en/policies/privacy and Google Analytics' Terms of Use at http://www.google.com/analytics/tos.html. You can opt-out from being tracked by Google Analytics in the future by downloading and installing Google Analytics' Opt-out Browser Add-on for your current web browser at http://tools.google.com/dlpage/gaoptout?hl=en. The Sites may use certain features of Google Analytics based on Display Advertising, such as:

"Demographics and Interest Reporting" to analyze information regarding the interests and demographics of users of the Sites. We use such non-personally identifiable information in the same manner as we use other non-personally identifiable information as described below.

"Remarketing with Google Analytics" to place ads on other sites directed to people who have visited the Sites.

“Google Display Network Impression Reporting” to report how people's interactions with our ads relate to their visits to the Sites.

You can opt-out of Google Analytics for Display Advertising and customize Google Display Network ads by changing the ad settings at: https://www.google.com/settings/ads.

Applications on mobile devices may transmit information to Flushmate about your location when you request information from the Sites. We may use that information to improve the products and services we provide to you.

When you use a Flushmate mobile application (“**Mobile App**”), we collect and use information about you in the same way and for the same purposes as we do when you use our Sites. In addition to this, we also use some other information that we collect automatically when you use our Mobile Apps. We collect information about Mobile App functionality that you access and use, which allows us to identify those areas of the Mobile App that are of interest to our users so that we can continuously improve our Mobile App, and to identify the products with which you interact, the locations thereof and the settings, adjustments and changes that you make thereto. The information we collect for this purpose enables us to indirectly identify you.

Each Mobile App also sends us the device’s Unique Device Identifier (or “**UDI**”), a sequence of numbers or characters that are unique to your mobile device and may be your mobile telephone number. We use this UDI in connection with every action you take when operating and using the Mobile App. When you use a Mobile App, you can choose to allow access to your current location – provided by your mobile device using GPS or similar technologies – in order to identify nearby events or places of interest. If you choose to allow access, this location data may be collected anonymously and logged by our servers. You can disable the Mobile App’s access to your location at any time through your phone settings menu.

Each Mobile App will also send us error-reporting information in the event that it crashes or hangs or the product with which the Mobile App facilitates connection is faulty, reports errors or is adjusted outside its allowable parameters, which enables us to investigate the error and to improve the stability of the Mobile App and the products for future releases. As part of these error reports, the Mobile App sends us information about the mobile device and product type and version, the UDI, the time the error or adjustment occurred, the feature being used, and the state of the application and product when the error or adjustment occurred.

You cannot control all the information that a Mobile App sends to us, but to the extent available you may change the available settings of the Mobile App under its “settings” menu, or changing the available settings of your mobile device. Alternatively, you can remove the Mobile App from your mobile device entirely.

5. How We Use Your Information

We may use the information we collect:

- To monitor and analyze information regarding your browsing and viewing preferences and to diagnose problems with the Sites;
- To analyze our users' demographics, interests, and purchasing practices;
- Fulfill orders, ship and confirm orders, and manage payment collection;
- To plan, improve and administer Activities;

- To process and respond to your product warranty claims, inquiries and other communications;
- For Sites administration, support and improvement;
- To alert you to new features, terms, Activities, special events, stores, products or services, and other useful information regarding any of the foregoing or Flushmate via email, direct mail telephone or other means;
- To market or promote other Flushmate products and/or services to you;
- To promote and improve the products and services we offer;
- To send announcements and newsletters, and to provide you with personalized content in connection with same;
- For the purposes for which you provided the information;
- To operate the automated and AI-assisted features, including our chat, support, and configurator tools, and to generate the analytics, predictions, and inferences described in this Privacy Policy;
- To test, monitor, evaluate, and improve the accuracy, safety, and security of those automated features, using de-identified or aggregated information wherever practicable;
- For fraud prevention, internal operations, legal compliance, and other public purposes; and
- To enforce the Terms of Use.

In addition to the uses discussed above, Flushmate may use non-personally identifiable information in any manner so long as Flushmate uses such information in its de-identified or aggregated form. These uses may include, without limitation, analysis of trends and how the Sites are used; improving navigation of the Sites; analysis of the performance of the Sites and diagnosis of problems; analysis and developing advertisements and advertising campaigns; and providing you with special offers and promotions and determining the effectiveness of same.

Flushmate also may use your non-personally identifiable information and email address to present you with targeted content and advertisements (including on third party websites and applications). Such targeted content and advertisements may include marketing for the Sites, and the products or services of Flushmate or its business and advertising partners. Your non-personally identifiable information also may be used to optimize and determine the effectiveness of content and advertisements, and to analyze interactions with content and advertisements.

Some of our third party advertisers or display networks may participate in the Digital Advertising Alliance's Self-Regulatory Program for Online Behavioral Advertising and allow consumers the ability to opt-out of targeted advertising based on web activity tracking. For more information regarding the foregoing, please visit http://www.aboutads.info/choices/. Please note that after clicking the link and following the instructions provided therein, even if our third party advertisers or display networks participate in the Digital Advertising Alliance's Self-Regulatory Program for Online Behavioral Advertising and you opt out of targeted advertising based on web activity tracking, you still may receive standard advertisements from us and targeted advertisements from third parties. You may need to re-click the link and follow the instructions provided therein if you delete cookies or other Collection Technology or use a different computer, device or browser.

6. How We Respond To "Do Not Track" Signals

Flushmate does not respond to or alter its practices detailed herein based upon your selection of the “Do Not Track” setting or other “opt out” setting or feature that may be offered by your browser; however, Flushmate reserves the right to do so in the future.

7. Communications with You

You authorize Flushmate to transmit email or postal mail to you or to telephone you, to respond to your communications, promote our services and administer and provide information to you about Activities. If we send any emails to promote our services, unsubscribe instructions will be included in each such promotional email from Flushmate. Please note that such requests may take up to ten (10) business days to become effective. You may not opt out of receiving communications regarding your dealings with Flushmate, the Sites or technical information about the Sites.

For the purposes of any applicable law regarding notification of persons whose personal information was, or is reasonably believed to have been, acquired by an unauthorized person, any required notification may, where permitted by law, be made by the use of e-mail, telephone, fax or mail (including a notice printed in an available area of a bill or statement) or by posting a notice on the Sites. The specific means used is up to us, and we will use our best judgment based on the circumstances. Where any notice is to be sent to a specific address or number (such as an e-mail address, physical address, telephone number, etc.), we will use the latest available address in our records. **YOU AGREE TO THIS MEANS OF NOTIFICATION.**

8. Information Sharing with Third Parties

Flushmate may disclose personal information to third parties only in the following limited circumstances and with appropriate safeguards:

(i) Service Providers: To service providers who perform functions on our behalf (such as payment processing, shipping, customer service, and website hosting) under contractual obligations to protect your information and use it only for the specified purposes;

This includes the third-party providers that host and operate our chat, messaging, and live support features. Under our agreements, those providers process the conversations and related data only to provide the chat service to us and are not permitted to use, sell, share, or retain it for their own purposes, including to develop or train their own products or models.

The same restrictions apply to the third-party providers of artificial intelligence and machine learning services that support automated features on our Sites. When you use one of those features, the information you submit may be transmitted to the provider so that it can generate a response or other output for us. Under our agreements those providers act only as our service providers or processors, may use the information only to deliver the service to Flushmate, and are not permitted to use it to develop, train, or improve their own models, or to sell, share, or retain it for their own purposes. Section 18 describes these features in more detail.

(ii) Business Partners: To business partners for joint marketing activities or co-sponsored events, but only with your explicit consent and with the ability to opt out;

(iii) Legal Requirements: When required by law, court order, or government request, or to protect our legal rights and safety;

(iv) Business Transfers: In connection with a merger, acquisition, or sale of assets, where the recipient agrees to honor this Privacy Policy;

(v) Affiliates: To our corporate affiliates for internal business purposes, subject to the same privacy protections as this Policy;

(vi) With Your Consent: As otherwise authorized by you for specific purposes;

(vii) Verification: To confirm or update information that you have provided to us; and

(viii) Analytics: To provide analytics for advertising and other purposes.

All third parties who receive personal information from us are contractually required to use the information only for the specified purpose, implement appropriate security measures, not further disclose the information without authorization, and delete the information when no longer needed for the specified purpose.

We do not sell personal information to data brokers or for general marketing purposes by unrelated third parties. We do not share any personally identifiable information for any such purposes in connection with the subscription services for Flushmate IOT restroom products unless we first obtain your express signed written consent.

We also may share your information in response to a subpoena, legal order or official request, when we believe you have acted in violation of the Terms of Use, to investigate, prevent or take action regarding suspected illegal activities, fraud or potential threats, or to exercise legal rights or defend against claims, when we believe that doing so may protect your safety or the safety of Flushmate or others, or as otherwise permitted or required by law.

We also may use and share non-personally identifiable information with other third parties. Additionally, we may take personally identifiable information and de-identify it and share it in a de-identified, anonymized or aggregated form with advertisers, business partners, and/or other third parties in order to analyze the Sites usage, demographics, or interests, improve the Sites or Flushmate's products or services, perform services on the Sites, improve the user experience, or for similar purposes. We will not re-identify such data and we will ask our contracting parties to agree to keep the data in its de-identified or anonymized form.

9. Children

The Sites are not directed toward children under 18 years of age nor does Flushmate knowingly collect information from children under 18 on the Sites or offline. If you are under 18, you are not permitted to register for an account on the Sites or to otherwise submit any personally identifiable information to Flushmate. If you provide information to Flushmate through the Sites or offline, you represent that you are 18 years of age or older.

10. Protection of Personal Information

Flushmate uses reasonable administrative, physical and electronic security measures to protect against the loss, misuse and alteration of personally identifiable information.

While we strive to protect personally identifiable information, neither Flushmate nor our service providers can ensure or warrant the security of any information you transmit to us over the internet. Any such transmission is at your own risk. We encourage you to take steps to protect your personal information, such as using strong passwords and keeping your login credentials confidential. In the event of a data breach that may affect your personal information, we will notify you and relevant authorities as required by applicable law.

11. Updating Your Information

You are responsible for keeping your information current. You may update your information by contacting us at dpo@sloan.com. We will use reasonable efforts to process any change you make; provided, however, that requests to delete information are subject to Flushmate's internal reporting, processing and retention policies and all applicable legal obligations.

12. Data Retention

We retain personal information for different periods depending on the purpose for which it was collected and applicable legal requirements:

Type of Information	Retention Period
Account Information	We retain account information for as long as your account remains active, plus 7 years after account closure for business records purposes.
Transaction Records	Purchase and transaction data is retained for 7 years to comply with financial recordkeeping requirements.
Marketing Communications	Contact information for marketing purposes is retained until you opt out or for 3 years of inactivity, whichever comes first.
Website Analytics	Aggregated and anonymized website usage data may be retained indefinitely for business analysis purposes.
Customer Service Records	Support interactions are retained for 3 years to improve service quality and resolve disputes.
IoT Device Data	Data from connected restroom products is retained according to the specific terms of service for those products, typically 2 years unless longer retention is required for warranty or safety purposes.
Legal Hold	We may retain information longer when required by law, regulation, litigation, or government request.
Automatic Deletion	We have implemented automated systems to delete personal information when retention periods expire, except where longer retention is legally required.
Chat and Support Communications	Chat transcripts and related records are retained for the period needed to provide support and to establish consent, and no longer than required by applicable law and our records policy.

Automated and AI-Assisted Feature Records	Inputs, outputs, and logs generated by the automated and AI-assisted features described in Section 18 are retained for the period needed to provide and support the feature, to maintain security and prevent misuse, and to meet our legal obligations. De-identified and aggregated information derived from those features, which no longer identifies you, may be retained for longer for analysis and quality purposes.

13. Notice of Your State Privacy Rights

Depending on your state of residency, you may have certain rights related to your personal data, including:

Access and Data Portability: You may confirm whether we process your personal data and access a copy of the personal data we process. To the extent feasible and required by state law, depending on your state, data will be provided in a portable format.

Correction: You may request that we correct inaccuracies in your personal data that we maintain, taking into account the information's nature and processing purpose.

Deletion*:* You may request that we delete personal data about you that we maintain, subject to certain exceptions under applicable law.

Opt Out of Using Personal Data for Targeted Advertising, Profiling, and Sales: You may request that we do not use your personal data for these purposes.

Opt Out of Profiling and Automated Decision-Making: Where your state or other law provides this right, you may opt out of profiling carried out in furtherance of decisions that produce legal or similarly significant effects concerning you. Section 18 explains where we use automated processing, the information it uses, the role of human involvement, and how to ask us to explain or review an outcome.

Important: The exact scope of these rights varies by state. There are also several exceptions where we may not have an obligation to fulfill your request. To appeal a decision regarding a consumer rights request please submit notice of your appeal to dpo@sloan.com citing specifically the reason for your appeal and, if desired, contact your State's Attorney General to lodge a complaint.

Some browsers and browser extensions support the Global Privacy Control ("**GPC**") that can send a signal to process your request to opt out from certain types of data processing, including data "sales" as defined under certain laws. When we detect such a signal, we will make reasonable efforts to respect your choices indicated by a GPC setting as required by applicable law.

To exercise your right to limit the use of your sensitive personal information, you can click on the "Limit The Use Of My Sensitive Personal Information" link on the Site home page. However, please know we do not currently sell data triggering that statute's opt-out requirements.

14. Notice of Privacy Rights of California Residents

Flushmate has adopted a policy of not sharing your personally identifiable information with third parties for their direct marketing purposes if you request that we do not do so ("**Opt-Out Policy**"). You may make such a request by

sending us an email at dpo@sloan.com. When contacting us, please indicate your name, address, email address, and what personally identifiable information you do not want us to share with third parties for their direct marketing purposes. Please note that there is no charge for controlling the sharing of your personally identifiable information or for processing this request.

If you are a California resident and have provided personal information to a business without an Opt-Out Policy, you may be entitled by law to request certain information regarding disclosures of personally-identifiable information made by such business to third parties for the third parties' direct marketing purposes during the immediately preceding calendar year ("**Disclosure Request**"). Such business is not required to respond to more than one Disclosure Request per customer each year, or to respond to requests made by means other than through the contact information designated by the business for such purposes. However, please note that due to Flushmate's Opt-Out Policy described in the preceding paragraph, we are not obligated by law to provide you with the requested information.

If you are still interested in making a Disclosure Request, please contact us at dpo@sloan.com. In the Disclosure Request, specify that you seek your “California Customer Choice Privacy Notice.” Please allow thirty (30) days for a response, but note that Flushmate is entitled by law to respond to your Disclosure Request by notifying you of your right to prevent the disclosure of personal information pursuant to our Opt-Out Policy.

Opt Out of Profiling and Automated Decision-Making: Where your state or other law provides this right, you may opt out of profiling carried out in furtherance of decisions that produce legal or similarly significant effects concerning you. Section 15 explains where we use automated processing, the information it uses, the role of human involvement, and how to ask us to explain or review an outcome.

If you are a California resident consumer, effective January 1, 2020, you are now afforded additional rights under the California Consumer Privacy Act (**CCPA**). Under the CCPA, California resident consumers are afforded the right to contact us and submit to us a request to know any or all of the following:

1. Specific pieces of personal information that we have about you
2. The categories of personal information we have collected about you
3. The categories of sources from which personal information about you was collected
4. The categories of personal information about you that we sold or disclosed for a business purpose
5. The categories of third parties to whom the personal information about you were sold or disclosed for a business purpose; and
6. The business or commercial purpose for collecting or selling personal information about you

As a California resident consumer, you are also afforded

1. the right to have your personal information deleted or transferred to a designated third party;
2. the right to opt-out of any sale of your personal information to a third party; and
3. the right not to be discriminated against should you exercise any of your CCPA rights.

Please note that under California law, as applicable to California resident consumers, your personal information includes any information that can be reasonably linked directly or indirectly to a particular consumer or particular household.

If you are a California resident consumer, you or your legally authorized agent acting on your behalf may submit your personal information requests by emailing us at dpo@sloan.com or by calling us at the following toll free number: 888-756-2612. Please note that when receiving your requests we have the obligation and right to use reasonable means to verify your identity when processing your request. We perform this verification procedure at no cost to you or your legally authorized agent. Upon receiving your verified request, we will confirm receipt of the request within 10 business days and we will provide a substantive response within 45 calendar days.

Selling Your Personal Information

We do not sell any of your personal information to a third party, i.e. for monetary compensation or in consideration for something of value to be received from the recipient of your information. If we do, you are afforded the right to opt-out of any sale or sharing of your personal information for value and you may opt-out by emailing us at dpo@sloan.com or by calling us at the following toll free number: 888-756-2612. Except as otherwise indicated, the information sharing that we do is so that we can provide you with the products and services that you have requested we provide you.

Responding to California Consumer Privacy Requests

We also reserve the right not to respond to or to deny a request to know or a request to allow access to or deletion of your information or to limit your rights under certain circumstances (e.g. if the request poses an unreasonable risk, we are lawfully entitled to do so, we are lawfully entitled to maintain an archive copy of your information despite a request to delete, if it is necessary to detect security incidents or if the rights of another individual might be violated, or if the request requires that we or our vendor, user or partner undertake a search or provide an accessible format when the information that is the subject of the request does not lend itself to a search or does not lend itself to the format being requested by the individual making the request). In some instances, this may mean that we and our vendor(s), other(s) and business partners are able to retain your personal information even if you withdraw your consent or if a California resident consumer, we and our vendor(s), other user(s) and business partner(s) can maintain an archive copy of your personal information on a backup system notwithstanding a request to delete your personal information. Moreover, we have the legal obligation not to transmit to you or others certain information deemed highly sensitive (assuming that we even have such information) but we should always be able to provide you with information about whether we have such highly sensitive information about you.

Unless we are designated as the Service Provider under the CCPA, please do not submit personal information requests to any of our vendors, users or business partners as they may not necessarily be required to respond to personal information requests that they may receive directly from our customer or clients. On the other hand, if we are the designated Service Provider for any product or service that is being offered to you, please direct your personal information requests directly to the company or other organization that has retained us as its/their Service Provider.

15. Links

You may have the opportunity to follow links on the Sites to other sites that may be of interest to you. Flushmate endeavors to only link to reputable organizations. Because other sites may not be hosted or controlled by Flushmate, we are not responsible for the privacy practices of those sites or the content provided thereon. Therefore, the privacy policies with respect to other sites may differ from those applicable to the Sites. We encourage you to review the privacy policies of each other site. This Privacy Policy only applies to information collected and maintained by Flushmate.

16. International Visitors

The Sites are hosted in the United States and are intended only for United States visitors. We do not solicit any personal data transmitted to us from others who are located in countries outside of the United States. If you are located in an EU member country, the United Kingdom, Iceland, Liechtenstein, Norway or Switzerland and you have sent us your personal data unsolicited, after we complete our review of your communication, we will appropriately delete it, including any personal data contained therein.

We may share, as described in this Privacy Policy, information with our affiliates and subsidiaries, and third parties. We may disclose information in response to legal process and lawful requests by public authorities in the United States and other countries, for the purposes of law enforcement and national security.

European Union and United Kingdom Data Protection: When we process personal data of EU or UK residents, we comply with the General Data Protection Regulation (GDPR) and UK GDPR respectively. We may process personal data based on consent, contract, legitimate interests, or legal obligation. If you are an EU or UK resident, you have rights including access, rectification, erasure, restriction of processing, data portability, objection to processing, and rights related to automated decision-making. You also have the right to lodge a complaint with your local data protection authority. When we transfer personal data outside the EU/UK, we ensure appropriate safeguards are in place, including Standard Contractual Clauses or adequacy decisions.

Automated decision-making and artificial intelligence: If we rely on legitimate interests to process your personal data using automated or AI-assisted tools, you may object to that processing. Where the EU Artificial Intelligence Act applies to a Flushmate interface, we will tell you that you are interacting with an artificial intelligence system unless that is already obvious in the circumstances, and we will mark artificially generated or manipulated content in the manner that Act requires.

17. Chat, Messaging, and Live Support Features

Sloan offers chat, messaging, and live support features, including any automated or AI-assisted chat and the Sink Configurator chat on our Sites, so that you can reach us and get product help quickly. This section explains how those features work and how we handle what you share in them. It supplements the rest of this Privacy Policy.

Some of these features may be operated by an automated assistant rather than by a member of our team. Where that is the case we will tell you, that disclosure remains available to you and you may ask to be transferred to a Flushmate representative.

Some these features rely on artificial intelligence services provided by third parties. When you use one of them, the content of your conversation may be shared with the provider so that it can generate a response for us, subject to

the contractual restrictions described in Section 7. We obtain your consent before your content is transmitted to a third-party provider.

Recording and monitoring: When you use a chat, messaging, or live support feature, Sloan and the service providers that operate these features for us record, monitor, store, and transcribe the conversation. This includes the messages you send and receive, the date and time of the conversation, the page or screen you were viewing, and the information you enter before or during the conversation, such as your name, your contact details, and the reason for your inquiry.

Consent: Before you make use of these features, you must agree to the recording and monitoring. By starting or continuing a chat after that notice, you, and any other person who takes part in the conversation, consent to the interception, recording, monitoring, storage, and transcription described here. If you do not agree, please do not use the chat feature.

How we use chat information: We use information from chats to respond to your questions, to provide and improve our products and services, to keep records of our communications with you, to train and evaluate our support personnel and to test and improve the automated features described in Section 18, to maintain quality and security, and to meet our legal obligations. We handle this information in the same way as the other personal information described in this Privacy Policy.

Please do not share sensitive information: Please do not enter payment card numbers, financial account numbers, or other personal or sensitive information into the chat.

18. Artificial Intelligence and Automated Processing

This section describes how Flushmate uses artificial intelligence, machine learning, and other automated processing, and the choices available to you. It supplements the rest of this Privacy Policy and does not replace it. Where a Flushmate product or service is governed by its own terms, including the subscription services for Flushmate IoT restroom products and any Flushmate Application Programming Interface, those terms also apply.

Where we use automated processing: We use automated processing in a limited number of places: in the chat, messaging, support, and configurator features described in Section 17; in the connected restroom products described in Section 3, to generate usage analytics and to predict maintenance needs; in fraud prevention, security monitoring, and abuse detection; in analytics relating to use of the Sites; and to personalize content, product recommendations, and advertising. Section 2 describes the categories of information used for these purposes.

We do not use your personal information to train general-purpose AI models: We do not use the personal information we collect through the Sites, Sloan Marketplace, the subscription services for Sloan IoT restroom products, or any Flushmate Application Programming Interface to develop, train, or fine-tune general-purpose artificial intelligence models, and we do not permit our service providers to use it for that purpose. We do use de-identified and aggregated information, which no longer identifies you, to test and improve our products, services, and automated features. If we decide to change this practice, we will treat that as a material change and follow the process described in Section 1.

Inferences and derived information: Our automated systems generate information about you that you did not provide to us directly, such as predicted product preferences, audience segments, predicted maintenance needs for

connected products, and fraud and security risk indicators. We treat that information as personal information, which means it carries the same protections, and the same access, correction, and deletion rights, as the information you give us directly.

Decisions about you: We do not use automated processing alone to make decisions about you that produce legal effects or that otherwise significantly affect you, such as decisions about employment or access to services. Where automated processing informs a decision of that kind, a member of our team reviews the outcome before it takes effect. If you believe an automated process has affected you, you may ask us to explain the decision, to correct the information it used, or to have the decision reviewed by a person, by contacting us as detailed in in the section Questions above.

Accuracy and limitations: Automated features can produce results that are incomplete or incorrect. Information provided through an automated feature is for general convenience only and is not a substitute for the specifications, installation instructions, warranty terms, or other documentation that accompany our products, or for advice from qualified professional. Please notify us if information you receive through one of these features appears to be wrong.

Your choices and contacting us: You may decline to use our automated features, ask to be transferred to a member of our team in any chat or support interaction, and exercise the rights that may be available to you under applicable law by contacting us.

QUESTIONS? If you have any questions or concerns regarding this Privacy Policy, please contact us at dpo@sloan.com. Please note that email communications may not be secure. Accordingly, you should not include personal or other sensitive information in your email correspondence to the Sites or Flushmate.

**The effective date appearing in the header of this page is the effective date of these Terms or Policies. In the event prior version is required to be visited, please use the version control feature mentioned at the top of the page.*