PRIVACY STATEMENT

This Statement has been updated and becomes effective on May 7, 2018.

Summary of our Privacy Statement

Personal Information

- We collect your personal information for various purposes, such as processing your order, corresponding with you or in connection with a job application.
- We may combine the information we collect from you with information obtained from other sources to help us improve its overall accuracy and completeness, and to help us better tailor our interactions with you.
- In addition, we may also collect information relating to your use of our Web site through the use of various technologies, including cookies.

Uses

- To fulfill your requests by us or by others involved in fulfillment.
- To support products or services you have obtained from us.
- To contact you in connection with certain transactions, for market research or customer satisfaction surveys.
- By POLLOCK INDUSTRIES and selected organizations for marketing purposes if you have permitted such use.
- To personalize your experience while you are on our site, make navigation easier, and for Web site usage statistics.

Your Choices

- When we collect information from you, you may tell us that you do not want it used for further marketing contact.
- You may also turn off cookies in your browser.

POLLOCK INDUSTRIES PRIVACY STATEMENT

Your privacy is important to POLLOCK INDUSTRIES; maintaining your trust is paramount to us.

This Statement discloses the information practices for POLLOCK INDUSTRIES and our affiliates' Web sites, from what type of information about our Web sites' users is gathered and tracked, to how the information is used, shared or otherwise processed offline. It also describes how cookies and other technologies may be used.

This Statement applies to POLLOCK INDUSTRIES Web sites that link to this Statement but does not apply to those POLLOCK INDUSTRIES Web sites that have their own Privacy Statement. From time to time, we may supplement this Statement with additional information relating to a particular interaction we have with you.

Collection of Personal Information

You may choose to give us personal information directly in a variety of situations. For example, you may want to give us your name and contact information to communicate with you, to order a product, to process an order, to register for a service or to do business with us if you are a supplier or a business partner. You may also provide your credit card details to buy something from us or may share a description of your education and work experience in connection with a job opening at POLLOCK INDUSTRIES for which you wish to be considered. If you tell us that you do not want us to use your information to make further contact with you beyond fulfilling your request, we will respect your wishes.

We may also collect information relating to your use of our Web site through the use of various technologies. For example, when you visit our Web site offerings, we may log certain information that your browser sends us, such as your IP address, browser type and language, access time, and referring Web site addresses, and we may collect information about the pages you view within our site and other actions you take while visiting us. We may also use such technologies to determine whether you've opened an e-mail or clicked on a link contained in an e-mail. Collecting information in this manner allows us to collect statistics about the usage and effectiveness of our Web site and to personalize your experience and tailor our interactions with you.

From time to time, we may also collect information that pertains to you indirectly through other sources, such as list vendors. When we do so, we ask the vendors to confirm that the information was legally acquired by the third party and that we have the right to obtain it from them and use it.

The information that we collect, either directly or indirectly, may be combined to help us improve its overall accuracy and completeness and to help us better tailor our interactions with you.

Use of Personal Information

The following paragraphs describe in more detail how POLLOCK INDUSTRIES may use your personal information.

Fulfilling your Transaction Request

If you request something from POLLOCK INDUSTRIES, for example, a product or service, a callback, or specific marketing materials, we will use the information you provide to fulfill your request. To help us do this, we may share information with others, for instance, POLLOCK INDUSTRIES' business partners, financial institutions, shipping companies, or postal or government authorities, such as Customs authorities, involved in fulfillment. In connection with a transaction, we may also contact you as part of our customer satisfaction surveys or for market research purposes.

Personalizing your Experience on our Web Site

We may use information we collect about you to provide you with a personalized experience on our Web site, such as providing you with content in which you may be interested and making navigation on our site easier.

Providing Support

We may use your personal information to support products or services you have obtained from us, such as notifying you of a product update or fix.

In the course of providing technical support to you, we may sometimes have incidental access to data that has been provided to us, such as on an application for credit or project history. This data may contain information about you, your organization's employees, customers, partners, or suppliers. This Privacy Statement does not apply to our access to or handling of this information; the conditions regarding the handling and processing of that data is covered by the applicable Confidentiality Agreement, Terms of Sale/Use or other agreements between you and POLLOCK INDUSTRIES.

Marketing

The information you provide to POLLOCK INDUSTRIES, as well as the information we have collected about you indirectly, may be used by POLLOCK

INDUSTRIES for marketing purposes. Before we do so, however, we will offer you the opportunity to choose whether or not to have your information used in this way. You may at any time choose not to receive marketing materials from us by following the unsubscribe instructions included in each e-mail you may receive, by indicating so when we call you, or by contacting us directly (please refer to "Privacy Questions and Access" below).

Some of our offerings may be co-branded, that is sponsored by both POLLOCK INDUSTRIES and third parties. If you sign up for these offerings, be aware that your information may also be collected by and shared with those third parties. We encourage you to familiarize yourself with their privacy policies to gain an understanding of the manner in which they will handle information about you. If you choose to "Email This Page" to a friend or colleague, we will ask for their name and e-mail address. We will automatically send a one-time e-mail sharing the page you indicated, but will not use that information for other purposes.

Recruitment

In connection with a job application or inquiry, whether advertised on POLLOCK INDUSTRIES Web site or otherwise, you may provide us with information about yourself, such as a resume. We may use this information throughout POLLOCK INDUSTRIES in order to address your inquiry or consider you for employment purposes. Unless you tell us not to do so, we may keep the information for future consideration.

Monitoring or Recording of Calls, Chats and Other Interactions

Certain online transactions may involve you calling us or us calling you. Please be aware that it is not POLLOCK INDUSTRIES' general practice to monitor or record such interactions. We will notify you in advance if a call will be recorded for staff training or quality assurance purposes or to retain evidence of a particular transaction or interaction.

Protect the Rights and Property of POLLOCK INDUSTRIES and Others

We may also use or share your information to protect the rights or property of POLLOCK INDUSTRIES, our business partners, suppliers, clients, or others when we have reasonable grounds to believe that such rights or property have been or could be affected. In addition, we reserve the right to disclose your personal information as required by law and when we believe that disclosure is necessary to protect our rights, or the rights of others, or to comply with a judicial proceeding, court order, or legal process served on our Web site.

Information for Business Partners

If you represent a POLLOCK INDUSTRIES business partner, we may use information provided on our web site to administer and develop our business relationship with you, the business partner you represent, and POLLOCK INDUSTRIES business partners generally. For instance, this may involve using your information to send you details of POLLOCK INDUSTRIES business partner programs. It may also include sharing certain information with other business partners (subject to any confidentiality obligations that may exist), or POLLOCK INDUSTRIES customers or prospects. In connection with a particular transaction or program, we may also contact you as part of customer satisfaction surveys or for market research purposes.

Information for Suppliers

If you represent a POLLOCK INDUSTRIES supplier, we may use the information provided in connection with entering into or performing a transaction with you. For example, this may include sharing information with other parts of POLLOCK INDUSTRIES, POLLOCK INDUSTRIES' business partners, customers, shipping companies, financial institutions and postal or government authorities involved in fulfillment. It may also be used to administer and develop our relationship with you, the supplier you represent, and other POLLOCK INDUSTRIES suppliers generally.

Sharing of Personal Information and International Transfers

POLLOCK INDUSTRIES operates globally. As such, we may share information about you and transfer it to countries in the world where we do business in connection with the uses identified above and in accordance with this Privacy Statement. Our Privacy Statement and our practices are designed to provide a globally consistent level of protection for personal information all over the world. This means that even in countries whose laws provide for less protection for your information, POLLOCK INDUSTRIES will still handle your information in the manner described here.

In some cases, POLLOCK INDUSTRIES uses suppliers located in various countries to collect, use, analyze, and otherwise process information on its behalf. It is POLLOCK INDUSTRIES' practice to require such suppliers to handle information in a manner consistent with POLLOCK INDUSTRIES' policies.

From time to time, we may disclose information that identifies you at an individual level and which we collected on our Web site to other non-POLLOCK INDUSTRIES entities that are not acting as our suppliers, such as our business partners and consultants. Except as described in this Privacy Statement, we will

only do so with your prior consent. We do not sell or lease such information however.

Circumstances may arise where, whether for strategic or other business reasons, POLLOCK INDUSTRIES decides to sell, buy, merge or otherwise reorganize businesses. Such a transaction may involve the disclosure of personal information to prospective or actual purchasers, or the receipt of such information from sellers. It is POLLOCK INDUSTRIES' practice to seek appropriate protection for information in these types of transactions.

Please be aware that in certain circumstances, personal information may be subject to disclosure to government agencies pursuant to judicial proceeding, court order, or legal process. We may also share your information to protect the rights or property of POLLOCK INDUSTRIES, our business partners, suppliers or clients, and others when we have reasonable grounds to believe that such rights or property have been or could be affected.

Information Security and Accuracy

We intend to protect your personal information and to maintain its accuracy. POLLOCK INDUSTRIES implements reasonable physical, administrative and technical safeguards to help us protect your personal information from unauthorized access, use and disclosure. For example, we encrypt certain sensitive personal information such as credit card information when we transmit such information over the Internet. We also require that our suppliers protect such information from unauthorized access, use and disclosure.

Retention

We will retain information you provide for as long as your account is active or as needed to provide you services. If you wish to request that we no longer use your information to provide you services contact us at sales@electracool.com. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Cookies and Other Technologies

As mentioned above, we collect information from your visits to our Web site to help us gather statistics about usage and effectiveness, personalize your experience, and tailor our interactions with you. We do so through the use of various technologies, including one called "cookies". A cookie is a piece of data that a Web site can send to your browser, which may then be stored on your computer as a tag that identifies your computer. While cookies are often only used to measure Web site usage (such as number of visitors and duration of visit)

and effectiveness (such as topics visitors are most interested in) and to allow for ease of navigation or use and, as such, are not associated with any personal information, they are also used at times to personalize a known visitor's experience to a Web site by being associated with profile information or user preferences. Over time this information provides valuable insight to help improve the user experience.

Cookies are typically categorized as "session" cookies or "persistent" cookies. Session cookies help you navigate through the Web site efficiently, keeping track of your progression from page to page so that you are not asked for information you have already provided during the current visit. Session cookies are stored in temporary memory and erased when the web browser is closed. Persistent cookies, on the other hand, store user preferences for current and successive visits. They are written on your device's hard disk, and are still valid when you restart your browser. We do not currently use persistent cookies but may do so in the future.

While POLLOCK INDUSTRIES Web site at this time do not recognize all automated browser signals regarding tracking mechanisms, such as "do not track" instructions, you can generally express your privacy preferences regarding the use of most cookies and similar technologies though your web browser. Look under the heading "Tools" (or similar heading) in your particular browser for information about controlling cookies. You can set your browser in most instances to notify you before you receive a cookie, giving you the chance to decide whether to accept it or not. You can also generally set your browser to turn off cookies. Since cookies allow you to take advantage of some of our Web sites' features, we recommend that you leave them turned on. If you block, turn off or otherwise reject our cookies, some Web pages may not display properly or you will not be able, for instance, to add items to your shopping cart, proceed to checkout, or use any Web site services that require you to sign in.

Online Advertising

POLLOCK INDUSTRIES does not deliver third party online advertisements on our Web site but we may advertise our products and services on others' Web sites. Please familiarize yourself with those Web site operators' or network advertisers' privacy policies to understand their practices relating to advertising, including what type of information they may collect about your Internet usage.

Links to Non-POLLOCK INDUSTRIES Web Sites and Third Party Applications

We may provide you with general links to non-POLLOCK INDUSTRIES Web

sites such as technical publications available at amazon.com or suppliers of accessories. Your use of these links and applications is subject to the third parties' privacy policies, and you should become familiar with the third party sites' privacy policies before using the links or applications.

POLLOCK INDUSTRIES is not responsible for the privacy practices or the content of those other Web sites.

Notification of Changes

We will post a notice for 30 days at the top of this page notifying users when this Privacy Statement is updated or modified in a material way. If we are going to use your personal information in a manner different from that stated at the time of collection, we will notify you, and you will have a choice as to whether or not we can use your personal information in such a way.

Privacy Questions and Access

If you have a question about this Privacy Statement or POLLOCK INDUSTRIES' handling of your information, you can send an email to the POLLOCK INDUSTRIES Web site coordinator: sales@electracool.com

You can also contact us at:

POLLOCK INDUSTRIES, Inc. PO Box 1003 White River, VT 05001 U.S.A.

In certain cases, you may have the ability to view or edit your personal information on-line. In the event your information is not accessible on-line, and you wish to obtain a copy of particular information you provided to POLLOCK INDUSTRIES, or if you become aware the information is incorrect and you would like us to correct it, contact us at the address below.

Before POLLOCK INDUSTRIES is able to provide you with any information or correct any inaccuracies, however, we may ask you to verify your identity and to provide other details to help us to respond to your request. We will contact you within 30 days of your request.

If you no longer wish to receive marketing e-mails from POLLOCK INDUSTRIES, please send an e-mail to: sales@electracool.com or follow the unsubscribe instructions included in each marketing email.