

Privacy Policy

Overview and Scope

We at CL Sales & Management Ltd. (the “Company,” “we,” “our,” or “us”) recognize the importance of protecting the privacy of personally identifiable information (“Personal Information” or “PII”) collected about you and other visitors (collectively, “Users”) to our website(s) and mobile application(s) (collectively, the “Site”). We are committed to ensuring that your privacy is protected. To that end, this Privacy Policy (“Policy”) discloses our practices regarding the collection, use, and disclosure of the PII we receive through Users’ use of the Site. By using the Site, you accept the terms of this Policy.

This Policy applies to the Site, which includes webtoprintq.com, webtopackq.com, and their respective subdomains, and all of the websites, mobile applications, and internet properties owned or operated by us, regardless of the medium by which the Site is accessed by Users (e.g., via a web or mobile browser).

Information We Collect

We are the sole owner of information collected on the Site. We collect several types of information from and about Users of the Site, including:

Personal Information: We may collect PII from you when you complete forms, navigate web pages, and in connection with other activities, services, features, or resources we make available on the Site. PII means any information that is linked or reasonably linkable to an identified or identifiable natural person. PII does not include publicly available information from government records, deidentified or aggregate information, or information excluded from the scope of applicable laws.

The type of PII we may collect, use, store, and disclose include the following categories of information:

Contact Information and Identifiers: Name, Company, Postal Address, Email Address, and Phone Number

Internet Identifiers and Activities: IP Address and other data automatically collected by cookies (see below)

Deidentified Information: We may collect deidentified information from you that may not by itself reasonably identify you as the source when you navigate the Site (“Deidentified Information”). Deidentified Information may include: (i) device type, (ii) device operating system, (iii) internet browser type, (iv) internet service provider, (v) referring/exit pages, (vi) date/time stamp, and (vii) clickstream information. We will take reasonable measures to ensure that Deidentified Information we collect is not personally identifiable and may not later be easily used to identify you as required by applicable law.

Children's Information: We do not offer our services or promote the Site to, nor do we intentionally collect or retain PII from, children who are younger than 18 years of age. If we discover that we have inadvertently collected information from a child under 18 years of age, we will promptly take all reasonable measures to delete such information from our systems.

How We Collect Information

The information we collect depends on what Users do when they visit or utilize the Site. We collect PII and Deidentified Information in various ways, including:

Directly from You: We collect PII when you voluntarily submit PII to us while completing forms on the Site and in connection with other activities, services, features, or resources we make available on the Site. The PII we collect depends on what you do when you visit or utilize the Site or how you choose to communicate with us.

Through Your Use of the Site: We may collect PII and Deidentified Information that your browser transmits when you visit the Site. We may also collect Deidentified Information about how you access and interact with the Site through the use of automated tracking technologies, such as session cookies, persistent cookies, and web beacons.

A cookie is a small data file that is transferred to an internet browser, which enables the Site to remember and customize your subsequent visits. We may use session cookies to make it easier for you to navigate the Site. Session cookies expire when you close your browser. We may also use persistent cookies to track and target your interests to enhance your experience on the Site. Persistent cookies remain on your device for an extended period of time.

Most internet browsers automatically accept cookies. However, you can instruct your internet browser to block cookies or to provide you with a warning prompt before you accept cookies from the Site. Please refer to your internet browser's instructions to learn more about these functions. If you reject cookies, the functionality of the Site may be limited and you may not be able to participate in several of the Site's features.

Additionally, we may use web beacons, which are single-pixel, electronic images embedded in the Site that allow us to gather information about your browsing activities on the Site. We use Google Analytics to help us understand how Users use the Site--you can read more about how Google uses your PII here: <https://www.google.com/intl/en/policies/privacy/> . You can also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout> .

From Third Party Services: We may collect PII about you from third parties whose privacy practices may differ from the practices described in this Policy. We do not make any representations or warranties concerning, and will not in any way be liable for, any informational content, products,

services, software, or other materials available through third parties. Your use of third parties' services and/or third party websites is governed by and subject to the terms and conditions of those third parties and/or third party websites. We encourage you to carefully review the privacy policies and statements of such third parties and/or third party websites.

How We Use Information

We may use Users' PII for lawful business purposes to help enhance Users' experience. These purposes include:

Direct Marketing: We may use your PII to send you promotional materials. You have the right to opt-out of receiving direct marketing.

Customer Service and User Communications: We may use your PII to help us respond to your inquiries, questions, requests, and support needs more efficiently.

User Experience Personalization: We may use your information to personalize the Service to your interests and preferences. We may also use Users' PII and/or Deidentified Information in the aggregate to analyze Users' browsing and usage activities and patterns in order to understand Users' interests and preferences with respect to the Site and our services. This will help us optimize your experience on the Site.

Business Optimization: We may use your PII and/or Deidentified Information to improve the content on our web pages, to customize the content and layout of our web pages, and in managing our everyday business needs. We may also use your feedback to improve the Site and our services. All of this is done with the intention of making the Site more useful for you.

Safety and Security: We may use your PII and/or Deidentified Information to promote the safety and security of the Service, our users, and other parties. For example, we may use the information to authenticate users, protect against fraud and abuse, respond to a legal request or claim, conduct audits, and enforce our terms and policies.

We will not collect additional categories of PII or use PII we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Location: We will transfer your PII to, and process your PII within, the United States and Germany.

How We Disclose Information

We may disclose Users' PII to third parties for a business purpose as described below. Otherwise, we do not sell or rent PII and will not disclose Users' PII to third parties without your permission.

To Our Affiliates: We may disclose your PII to affiliates.

To Service Providers: We may disclose your PII to third party service providers that assist us in providing user support, communicating with Users, and promoting our services, as well as third party service providers that provide other services to us relating to our services and/or the Site.

Law Enforcement, Safety, and Legal Processes: We may disclose your PII to law enforcement or other government officials if it relates to a criminal investigation or alleged criminal activity. We may also disclose your PII: (i) if required or permitted to do so by law; (ii) for fraud protection and credit risk reduction purposes; (iii) in the good-faith belief that such action is necessary to protect our rights, interests, or property; (iv) in the good-faith belief that such action is necessary to protect your safety or the safety of others; or (v) to comply with a judicial proceeding, court order, subpoena, or other similar legal or administrative process.

Sale or Acquisition of Assets: If we become involved in a transaction involving the sale of our assets, such as a merger or acquisition, or if we are transferred to another company, we may disclose and/or transfer your PII as part of the transaction. If the surviving entity in that transaction is not us, the surviving company may use your PII pursuant to its own privacy policies, and those policies may be different from this Policy.

Security

The security and confidentiality of your PII is very important to us. We use commercially reasonable security measures to protect your PII on the Site. However, no data transmitted over or accessible through the internet can be guaranteed to be 100% secure. As a result, while we attempt to protect your PII, we cannot guarantee or warrant that your PII will be completely secure (i) from misappropriation by hackers or from other nefarious or criminal activities, or (ii) in the event of a failure of computer hardware, software, or a telecommunications networks.

California Privacy Rights

California's "Shine the Light" law permits Users of the Site that are California residents to request certain information regarding our disclosure of PII to third parties for their direct marketing purposes. To make such a request, please contact us at the Contact Information provided below.

Data Retention

We will retain Users' PII while they maintain an account with us or to the extent necessary to provide the services through the Site. Thereafter, we will keep PII for as long as necessary: (i) to respond to any queries from Users; (ii) to demonstrate we treated Users fairly; (iii) for ordinary

business continuity procedures; or (iv) to comply with any applicable laws. We delete PII within a reasonable period after we no longer need the information for the purposes set out in this Policy.

Do Not Track Disclosure

Some internet browsers may transmit “do-not-track” signals to websites with which the browser communicates. The Site does not currently respond to these “do-not-track” signals.

SPAM

We do not participate in bulk email solicitations that you have not consented to receiving (i.e., “Spam”). We do not sell or disclose customer lists or email address lists to unrelated third parties. Except as otherwise provided herein, we do not share PII with any third party advertisers.

Third Party Links and Collection

The Site may contain links to other websites or applications that are not owned by us (“Linked Sites”). Further, the Site contains cookies, web beacons, or other technologies through which your information may be directly collected by certain third parties, including webflow, Hotjar, and Calendly (“Third Party Collectors”). We do not control the collection or use of any information, including PII, which occurs through Third Party Collector technology or while you visit Linked Sites. Therefore, we make no representations or warranties for—and will not in any way be liable for—any content, products, services, software, or other materials available on Linked Sites, even if one or more pages of the Linked Sites are framed within a page of the Site.

We make no representations or warranties about the privacy policies or practices of the Linked Sites or any Third Party Collectors, and we are not responsible for the privacy practices of those Linked Sites or Third Party Collectors. We encourage you to be aware of when you leave the Site and read the privacy policies of Linked Sites and Third Party Collectors.

Modifications

We reserve the right to update this Policy from time-to-time in our sole discretion. If our privacy practices change materially in the future, we will post an updated version of the privacy policy to the Site. It is your responsibility to review this Policy for any changes each time you use the Site. We will not lessen your rights under this Policy without your explicit consent. If you do not agree with the changes made, we will honor any opt-out requests made after the Effective Date of a new privacy policy.

Accessing, Updating, and Controlling Information

If you ever wish to access, update, change, delete, or otherwise control your PII, you may do so by contacting us at the Contact Information provided below. To help us process your request, please

provide sufficient information to allow us to identify you in our records. We reserve the right to ask for additional information verifying your identity prior to disclosing any PII to you. Should we ask for verification, the information you provide will be used only for verification purposes, and all copies of the information will be destroyed when the process is complete.

If you do not wish to receive update messages and/or direct marketing communications from us, you may opt-out by (i) following any instructions included in the communication or (ii) contacting us at the Contact Information provided below. Please be aware that although you may opt-out of update messages and/or direct marketing communications, we reserve the right to email you administrative notices regarding the Site, as permitted under the CAN-SPAM Act.

We will make commercially reasonable efforts to respond to opt-out requests, and handle requests to access, update, change, delete, or otherwise control your PII as quickly as possible.

Contact Information

If you have questions about this Policy or wish to contact us with questions or comments, please contact us.

Effective Date 12/01/2021

This Policy was last modified as of the effective date printed above. This version of the privacy policy replaces and supersedes any prior privacy policies applicable to the Site.