

NEWRY LLC
Privacy Policy

LAST UPDATE: September 11, 2025

Newry LLC and its affiliates (“Newry”, “we”, “our”, and “us”) respect your concerns about privacy and personal data protection and value our relationship with you. This Privacy Policy (the “Policy”) applies solely to personal information collected through the Newry Website, online services, any applications, and web pages that post, specifically reference, and incorporate this Policy (all of the foregoing, collectively, the “Site”), whether accessed via computer, mobile device or other device (collectively, “Device”).

This Policy describes the types of personal information we collect through the Site and how that personal information may be used and/or with whom it may be shared. This Policy also describes how you can reach us to update your personal information, access and control the use of the personal information, or get answers to questions you may have about our privacy practices at this Site. Please read this Policy carefully, because by accessing and using this Site you are acknowledging that you understand and agree to the terms of this Policy. In addition, please review our [Terms of Use](#), which governs your use of this Site.

1. CONSENT

Consent to Data Collection and Processing

You hereby agree with and consent to the collection and processing of your personal information as described in this Policy.

Consent to International Data Transfers

Your personal information may be collected, processed and stored by Newry or its services providers in the United States and other countries where our servers reside. Please be aware that the privacy protections and legal requirements, including the rights of authorities to access your personal information, in some of these countries may not be equivalent to those in your country. You hereby agree with and consent to the transfer of your personal data to the United States and other countries where Newry operates.

Withdrawal of Consent

You have the right, at any time, to withdraw your consent to Newry’s collection and processing of your information, or to the transfer of your personal data to the United States and other countries where Newry operates. You may withdraw your consent by emailing Newry at admin@newrycorp.com.

2. COLLECTION AND USE OF PERSONAL INFORMATION

As you interact with Newry, there may be opportunities for you to provide us with your information. Additionally, we may collect certain information about you as further described below.

You may provide us with information about you through a number of sources: the Site and Newry events, surveys, social media platforms, sweepstakes entries, and through our customer contact centers.

The categories of information that Newry collects about you may include, but are not limited to:

- Identifiers/Contact information (such as name, address, city, state and ZIP code, email address, telephone number, unique personal identifier, online identifier, IP address, Social Security number, driver’s license number, passport number, or other similar identifiers)

- Information about your connected devices (such as mobile phone, computer, or tablet) and how you interact with our products, services, apps, and websites (such as IP address, browser type, unique device identifier, cookie data, and associated identifying and usage information)
- Inferences drawn from other personal information (such as personal preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes)

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you as described herein;
- Indirectly from you. For example, through information we collect in the course of providing services and products.
- Directly and indirectly from activity on this Site.
- From third-parties that interact with us in connection with the services and products we provide.

The information Newry collects about you and your devices may be used:

- To provide products and services and maintain customer relationships
- To improve the quality, safety, and security of our products and services
- To operate our Site
- To autofill data fields on our websites or applications to improve your online experience
- To develop new products and services
- To provide customer support and service (such as recall information)
- To provide information and product updates
- For research, evaluation of use, and troubleshooting purposes
- For marketing and analytics purposes
- To customize and improve communication content
- To comply with legal, regulator, or contractual requirements

Communications with you in connection with these uses may be via mail, telephone, e-mail, text message, social media, or other electronic messages, or via our websites and applications.

Personal Information You Provide

The privacy and security of the personal information that Newry collects from you is a priority for Newry. When you visit this Site you may be asked or choose to provide personal information that could reasonably be used to contact you or to identify you personally including, but not limited to: your name, address, telephone number, birth date, and email address.

- You may choose to receive certain communications from Newry via your email address upon interaction with the Site. From time to time Newry may include surveys, information requests, or other features on the Site which ask you to provide personal information such as your name, telephone number, email address or mailing address. Any information you may provide will be used by Newry to allow you to participate in the particular feature being offered. Newry may also retain any information you provide in order to send you information about Newry's products and

services that may be of interest to you. Newry will provide you with the opportunity to opt-out of receiving such communications. We may use one or more service providers to administer these messages, but we do not share your email address with spammers or any other third parties without your permission.

By submitting personal information to Newry at this Site, you hereby consent to Newry's collection, use and disclosure of such personal information.

We may combine the personal information you submit directly through this Site with other personal information we have collected from you, whether on- or offline. We may also combine it with information we receive about you from other sources, such as other companies, publicly available information sources (including information from your publicly available social media profiles), and other third parties.

The information that you provide in each case will vary. In some cases, you may be able to provide personal information via email or free text boxes, such as contacting Newry to request further information. When providing your personal information, please provide only relevant information and do not provide unnecessary sensitive information, such as Social Security numbers, credit card information or other sensitive personal data, unless required for our services.

Passive Information Collection and Use

We may partner with trusted third-party vendors to analyze performance and traffic of our Site. This may include things like buttons you click, mouse movements and other behavior on the Site, date and time of access, pages visited, web beacons, and cookie or pixel tag information. We also partner with a trusted third-party vendor to provide you with chat features to better assist you. When using the chat features, please only provide necessary information and do not provide sensitive information, unless required. *For recordkeeping, training, and quality assurance purposes, we or our third-party vendor may record and maintain a transcript of any communications in the chat.*

For the Site to function properly, we use cookies as further described below. To obtain your valid consent for the use and storage of cookies in the browser you use to access the Site and to properly document this we use a consent management platform: CookieFirst. This technology is provided by Digital Data Solutions BV, Plantage Middenlaan 42a, 1018 DH, Amsterdam, The Netherlands. Website: <https://cookiefirst.com> referred to as CookieFirst.

As you navigate around this Site, certain information can be passively collected (that is, gathered without you actively providing the information), using various technologies. We passively collect and use information in a variety of ways, including:

- **Through your browser and Device:** Certain information is collected by most browsers, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system version, and Internet browser type and version. We collect Device-specific information (such as your hardware model, operating system version, unique device identifiers, and mobile network information including phone number).
- **Cookies:** Cookies are pieces of information stored directly on the computer you are using. Cookies allow us to collect information such as browser type, time spent on this Site, pages visited, and language preferences. We and our service providers use the information for security purposes, to facilitate navigation, and display information more effectively. In addition, we use cookies to gather statistical information about Site usage in order to continually improve its design and functionality, understand how individuals use it, and to assist us with resolving questions regarding it.

You can choose to accept or decline cookies. You may use our Cookie Settings (linked in the footer of our Site) to control what cookies are used on the Site. Additionally, most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. If you would prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) to disable existing cookies; or (iii) to set your browser to automatically reject any cookies. If you set your browser to reject cookies, part of the Site may not work for you.

- Pixel tags, web beacons, clear GIFs, or other similar technologies: These may be used in connection with some Site pages to, among other things, track the actions of Site users and compile statistics about Site usage and response rates.
- IP Address: Your IP Address is a number that is automatically assigned to the computer that you are using by your Internet Service Provider. An IP Address is identified and logged automatically in our server log files whenever a user visits this Site, along with the time of the visit and the page(s) that were visited. Collecting IP Addresses is standard practice on the Internet and is done automatically by many web sites. We use IP Addresses for purposes such as calculating Site usage levels, helping diagnose server problems, and administering this Site.
- Do Not Track Requests: Your selection of the “Do Not Track” option provided by your browser may not have any effect on our collection of cookie information for analytic and internal purposes. We currently do not process Do Not Track signals. The only way to completely opt out of the collection of any information through cookies or other tracking technology is to actively manage the settings on your browser or Device to delete and disable cookies and other tracking/recording tools. Please note, depending on your type of Device or browser, it may not be possible to delete or disable all tracking mechanisms on your Device.

We permit third-party advertising partners to use the foregoing tracking technologies to collect information about your browsing activities over time and across different websites when you use the Site. For example, we use advertising services provided by third-party ad partners, such as Google, to market our service to you on other websites and online services. Through a process called “retargeting,” each service places a cookie on your browser when you visit the Site so that they can identify you and serve you ads on other sites around the web based on your browsing activity. To avoid use of this information for advertising by these third-party ad partners, you can change your browser settings to reject cookies or to notify you when cookies are set and you could select the Do Not Track option on your browser, though we have no control over and cannot confirm whether these third-party ad partners honor the Do Not Track browser signal. Additionally, many advertising companies are members of the NAI or DAA and/or provide opt-outs on those industry pages at networkadvertising.org/choices or aboutads.info/choices.

We utilize Google Analytics on the Site. Google Analytics is a website analysis service provided by Google, Inc. (“Google”). Google utilizes the data collected to track and examine the use of this Site, to prepare reports on its activities and share them with other Google services. Google may use the data collected to contextualize and personalize the ads of its own advertising network. For more information on Google’s Privacy Policy go to <https://www.google.com/intl/en/policies/privacy/>. Users can opt-out of Google Analytics tracking at <https://tools.google.com/dlpage/gaoptout/>.

We, along with third-party vendors such as Google use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to compile data regarding user interactions with ad impressions and other ad service functions as they relate to our website. Users can set preferences for how Google advertises to you using the Google Ad Settings page. Alternatively, you can opt out by visiting the Network Advertising Initiative Opt Out page or by using the Google Analytics Opt Out Browser add on.

Integrated Accounts and Social Media Information

We may implement applications or “widgets” from third party providers (e.g., Facebook, Twitter, Instagram, LinkedIn, etc.) that allow interaction, integration or content sharing with third party services. These widgets or applications may be visible on a page you visit on our Site or may require log-in through the third party provider’s service. The third party providing the widget or integration may offer controls for you to manage your interactions. Any interaction with a third party widget or application typically allows the third party to collect some information about you (whether through cookies, registration information or otherwise). These third parties may even track you when you do not interact with the widget. If you have engaged any of these third party service providers, their respective privacy policies will govern their tracking and collection of information. You should review these third party policies to understand these practices.

How We Use and Disclose Information

We do not sell or lease your personal information to any third party. We may disclose personal information that we collect or that you provide as described in this Policy. The information may be disclosed for a business purpose to the following categories of third parties:

- To contractors, service providers and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them. We also provide personal information to such third party service providers who provide services such as website hosting and moderating, mobile application hosting, data analysis, infrastructure provision, IT services, e-mail services, marketing services, auditing services, and other services, in order to enable them to provide our services and Site to you;
- To third parties to market their products or services to you if you have consented to these disclosures. We contractually require these third parties to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To our affiliates for related business purposes.

We use and disclose personal information you provide to us as described to you at the point of collection, such as when you (1) submit your name and email address to receive product updates and marketing information, (2) complete a survey or other fillable forms on the Site, (3) contact us for more information, and (4) send e-mail messages or feedback, or transmit other information by e-mail. When you elect to engage in such activities, we may ask that you provide us personal information, such as your first and last name, mailing address (including zip code), e-mail address, and mobile telephone numbers.

We also use and transfer personal information from or about you:

- to respond to your inquiries and fulfill your requests, such as to send you documents you request or e-mail;
- to send you important information regarding our relationship with you or regarding this Site, changes to our terms, conditions, and policies and/or other administrative information;
- for our business purposes, such as marketing new products and services, data analysis, audits, developing new products or services, enhancing our Site, improving our products and services, identifying Site usage trends, and determining the effectiveness of our Site;
- to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings); and
- when we otherwise have your consent. For example, if you sign up for programs offered by our partners, we may share certain information with the partner. This could include, but is not limited to, enrollment information and the activation status of your device. Your consent is required to allow these exchanges on your behalf and you can change your mind at any time.

In addition, we use and disclose personal information collected through this Site as we believe to be necessary or appropriate: (a) as permitted by applicable law, including laws outside your country of residence; (b) to comply with any legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our [Terms of Use](#); (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain. We may also use and disclose personal information collected through this Site in other ways, with your prior consent.

We also use and disclose information we collect passively as described above, under "Passive Information Collection and Use," and for any other purpose, except where we are required to do otherwise under applicable law (for example, if we are required to treat such information as personal information). In addition, we may use and disclose information that is not in personally identifiable form (such as anonymized, masked or de-identified information) for any purpose. If we combine information that is not in personally identifiable form with information that is (such as combining your

name with your geographical location), we will treat the combined information as personal information as long as it is combined.

Use of Information for Marketing Purposes

Newry and our affiliates may send you regular promotional communications about our products, services, events and promotions. In order to provide you with the best personalized experience, sometimes these communications may be tailored to your preferences (for example, as you indicate these to us, as we may have inferred from your Site visits, or based on the links you click in our emails). When required by applicable law, we will obtain your consent before starting these activities. In addition, you may withdraw your consent (opt-out) at any time.

In particular, you can opt-out from receiving marketing-related emails by following the unsubscribe instructions provided in each email. You can also contact us using the contact details provided below to opt-out from receiving marketing-related communications.

Please note that even if you opt-out from receiving marketing communications, you might still receive administrative communications from us, such as technical updates of our products, order confirmations, notifications about your activities, and other important notices.

3. GENERAL PRINCIPLES FOR THE PROCESSING OF PERSONAL INFORMATION

Personal information will be collected, stored, processed and transmitted in accordance with Newry's established policies and applicable federal, state, local and foreign laws, rules and regulations.

The principles of Newry with respect to the processing of personal information are as follows: (1) personal information will be processed fairly and lawfully, (2) personal information will be collected for specified, explicit, and legitimate purposes and not further processed for incompatible purposes, (3) personal information collected by Newry will be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are collected and processed, (4) personal information collected by Newry will be accurate and, where necessary, kept up to date to the best of our ability, and (5) personal information collected by Newry will be retained as identifiable data for no longer than necessary to serve the purposes for which the personal information was collected.

If Newry engages in the processing of personal information for purposes other than those specified in this Policy, Newry will provide notice of these changes, the purposes for which the personal information will be used, and the recipients of personal information.

4. THIRD PARTY SITES AND SERVICES

This Policy does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third party operating any site or web property (including, without limitation, any application) that is available through this Site or to which this Site contains a link. The availability of, or inclusion of a link to, any such site or property on this Site does not imply endorsement of it by us or by our affiliates.

Third parties may offer products and services on the Sites and collect information about you by requesting certain information necessary to provide a particular product or service (including, for example, insurance coverage for your Newry products or reports of insurance claims). Newry may also obtain certain information about its users from third party customer research groups (e.g., demographic information) which Newry uses to learn more about its customers. Newry does not control the policies and practices of third parties in relation to the use and disclosure of any information about users collected by third parties on the Site or in market research programs conducted by such third parties and any use or disclosure of such information by third parties is not governed by this Policy.

5. CHOICES AND ACCESS

We give you choices regarding our use and disclosure of your personal information. Newry provides you with the opportunity to receive information by email, regular mail or telephone calls from Newry, or third parties which may be of interest to you, including information relating to new products and services offered on the Site by Newry, or other third parties. If you do not want to receive any information by email, regular mail or telephone calls, you may

opt-out of further communications provided by Newry at any time by: (i) sending Newry an email at admin@newrycorp.com; or (ii) writing to Newry at 20116 Chagrin Blvd, Shaker Heights, OH 44122, Attention: Webmaster. Please note that Newry can only comply with requests relating to email, regular mail or telephone communications provided by Newry. If you no longer wish to receive further information by email, regular mail or telephone from any third party, you will need to contact such third party directly to opt-out of further communications being provided to you. We will seek to comply with your request(s) as soon as reasonably practicable.

6. ACCURACY

It is your responsibility to provide Newry with accurate personal information. Except as otherwise set forth in this Policy, Newry shall only use personal information in ways that are compatible with the purposes for which it was collected or subsequently authorized by you. To the extent necessary for these purposes, Newry shall take reasonable steps to ensure that personal information is accurate, complete, current and relevant to its intended use.

7. YOUR RIGHTS OVER YOUR INFORMATION

Under the (i) General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, or “GDPR”), (ii) Data Protection Act 2018, (iii) the GDPR as it forms part of the law of England and Wales, Scotland and Northern Ireland (i.e., “UK GDPR”) as provided in the Data Protection Act 2018, and (iv) any other applicable data protection legislation of any country or other jurisdiction (collectively “International Data Protection Laws”) individuals have specific rights with respect to their personal information, or “personal data” as defined under the International Data Protection Laws. For the purposes of this Policy, Newry operates as a data controller. Any personal data we collect from you is processed in the United States and under the terms of this Policy.

Any personal data we collect from you is processed in the legitimate interest of our business and providing our services to you as the lawful means of such processing. You may always withdraw your consent to our use of your personal data as described below. We will only retain your personal data for the time necessary to provide you the information and services to which you have consented, to comply with the law and in accordance with your rights below.

The Data Controller is:

NAME: Newry LLC
ADDRESS: 20116 Chagrin Blvd
Shaker Heights, OH 44122
Attention: Legal Department
EMAIL ADDRESS: admin@newrycorp.com

You can exercise any of the following rights, subject to verification of your identity, by notifying us as described below:

- Access. You may request access to your personal data that you provided or that we collected on the Site.
- Automated Processing and Decision-Making. You may request that we stop using your personal data for automated processing, such as profiling. When contacting Newry, please explain how you wish us to restrict automated processing of your personal data. When such restrictions are not possible, we will advise you accordingly. You can then choose to exercise any other rights under this Policy, to include withdrawing your consent to the processing of your personal data.
- Correction or Rectification. You can correct what personal data our Site database currently contains by emailing us (as provided below) to request that we correct or rectify any personal data that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause information to be incorrect.
- Restrict Processing. When applicable, you may restrict the processing of your personal data by submitting a request via email (to the email provided below). In your email, please explain how you wish us to restrict processing of your personal data. When such restrictions are not possible, we will advise you accordingly.

You can then choose to exercise any other rights under this Policy, to include withdrawing your consent to the processing of your personal data.

- *Object to Processing.* When applicable, you have the right to object to the processing of your personal data by submitting a request via email to (to the email provided below). When such objections are not possible, we will advise you accordingly. You can then choose to exercise any other rights under this Policy, to include withdrawing your consent to the processing of your personal data.
- *Portability.* Upon request and when possible, we can provide you with copies of your personal data. When such a request cannot be honored, we will advise you accordingly. You can then choose to exercise any other rights under this Policy, to include withdrawing your consent.
- *Withdraw Consent.* At any time, you may withdraw your consent to our processing of your personal data through this Site by notifying us via email (to the email provided below). Simply type the words “WITHDRAW CONSENT” in the subject line of your email. Upon receipt of such a withdrawal of consent, we will confirm receipt and proceed to stop processing your personal data.
- *Erasure.* If you should wish to cease use of our Site and have your personal data deleted from our Site, then you may submit a request by emailing us at the email provided below. Upon receipt of such a request for erasure, we will confirm receipt and will confirm once your personal data has been deleted.

Exercising your rights. If you are a data subject that has rights under the International Data Protection Laws, who chooses to exercise the rights listed above, you can submit a request via email at admin@newrycorp.com.

Submit Complaints or Questions. If you wish to raise a complaint on how we have handled your personal data, you can contact us as described below. If you reside in a European Union member state or the United Kingdom, you may also lodge a complaint with the supervisory authority in your country.

California

If you are a California resident, you have the right to request information from Newry regarding the manner in which Newry shares certain categories of your personal information with third parties, for the third parties’ direct marketing purposes. California law provides that you have the right to submit a request to Newry at its designated address and receive the following information:

- The categories of information Newry disclosed to third parties for the third parties’ direct marketing purposes during the preceding calendar year; and
- The names and address of third parties that received such information, or if the nature of their business cannot be determined from the name, then examples of the products or services marketed.

You are entitled to receive a copy of this information in a standardized format and the information will not be specific to you individually. You may make such a request by emailing us at admin@newrycorp.com.

8. RETENTION PERIOD

We retain your personal information for the period necessary to fulfill the purposes outlined in this Policy, unless a longer retention period is required or allowed by law or to otherwise fulfill a legal obligation.

9. SECURITY

Newry has implemented security measures designed to protect personal information provided by you against unauthorized access and use. Please be aware, however, that no data transmission over the Internet is 100% secure and any information disclosed online can potentially be collected and used by parties other than the intended recipient. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us of the problem by contacting us in accordance with the CONTACTING US section below.

10. USE OF SITE BY MINORS

We do not intentionally collect information from individuals under the age of 13. The Site is not directed to individuals under the age of 13 and we request that these individuals not provide personal information through this Site. We encourage parents and guardians to provide adequate protection measures to prevent minors from providing information unwillingly on the internet. If we are aware of any personal information that we have collected about minors, we will take steps to securely remove it from our systems.

11. FEEDBACK

We welcome inquiries or feedback on the Site, services or products you might use or like to use. Any inquiries, feedback, suggestions, or ideas you provide to us (collectively, “Feedback”) will be treated as non-proprietary and non-confidential. Your Feedback on or through this Site may be available to others who visit this Site. In addition, we may use your Feedback in advertising campaigns and other promotions. We may or may not use your name in connection with such use, and we may or may not seek your consent before using the Feedback for such purposes. Therefore, you should have no expectation of privacy with respect to your Feedback on or through this Site. You should not submit any content you do not wish to make available to the general public, and you must take special care to make sure your Feedback comply with our Terms of Use or other applicable agreements. All terms and conditions of our Terms of Use apply to Feedback on or through this Site. In particular, your Feedback must not violate the privacy or other rights of others. You may not use false identifying information or contact information, impersonate any person or entity, or otherwise mislead us as to the origin of any Feedback.

12. UPDATES TO THIS PRIVACY POLICY

We may change this Policy. Please review the LAST UPDATE legend at the top of this page to see when this Policy was last revised. Any changes to this Policy will become effective when we post the revised Policy on this Site. Your use of this Site following these changes means that you accept the revised Policy.

13. YOUR RIGHT TO COMPLAIN

If you have a complaint as to our use of your information, you may file a complaint with us.

A complaint may be submitted directly to Newry:

- In writing by filling out the *Complaint Form*;
- In writing by sending an email to admin@newrycorp.com
- In writing by sending a letter to 20116 Chagrin Blvd, Shaker Heights, OH 44122; or Orally by directly contacting 440.808.3839

15. CONTACTING US

If you have any questions about this Policy, please contact Newry directly. Our contact information is as follows:

Newry LLC
20116 Chagrin Blvd
Shaker Heights, OH 44122
Attention: Legal Department
440.808.3839
(Monday to Friday, 8am – 5pm EST)
admin@newrycorp.com

Complaint Form

Reporting a complaint to Newry

All individuals whose personal data has been collected or processed by Newry are encouraged to inform Newry of material privacy issues that can be perceived as violations of their rights.

Any complaint can be reported as follows:

By email: admin@newrycorp.com

By phone: 440.808.3839

By mail: 20116 Chagrin Blvd, Shaker Heights, OH 44122

1. Your Identity

Date	
First and Last Name	
Preferred contact address	
Email Address	
Other relevant identification you wish to provide	

2. Your Complaint

Object of your complaint. Please identify as much information as possible. Identify any specific individuals or operational groups.	
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Please submit this form through email to: admin@newrycorp.com or
by mail to: 20116 Chagrin Blvd., Shaker Heights, OH 44122