

Bombas Privacy Policy and Cookie Policy

Effective Date: September 29, 2021

If you are resident in the UK or EEA, please see Section 14 of this Privacy and Cookie Policy to review how we process your personal data and your rights in respect of your personal data.

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1. General Purpose

Bombas has developed this **Bombas Privacy Policy and Cookie Policy** (the "Privacy Policy") to demonstrate its commitment to protecting the privacy of users of the www.bombas.co.uk website and our other digital properties that contain a link to this Privacy Policy (collectively, our "Site"). This Privacy Policy sets forth how we collect information from users of our Site and how we use that information.

This Privacy Policy is intended to summarize and inform you of our general privacy and data protection practices regarding the collection, use, and disclosure of information when you use our Site, and the choices you have with respect to that information.

Please read this Privacy Policy carefully. Please note that, when used in this Privacy Policy, the term "including" (as well as related terms such as "include" and "includes") means "including, but not limited to," and is meant to be inclusive, not exclusive. This Privacy Policy forms part of our **Bombas Terms and Conditions of Use** (our "Terms and Conditions"). To read our Terms and Conditions, [click here](#).

By accessing our Site, you acknowledge the practices described in this Privacy Policy. This Privacy Policy may change from time to time. Each time you use the Site, the current version of the Privacy Policy will apply. Accordingly, when you use our Site, you should check the "Effective Date" at the top of the Privacy Policy and review any changes since the last version.

We may collect information submitted by users, information received on the basis of users' visits to, interactions with, and activities on our Site, and other information provided by third-party vendors. We may use various

technologies (e.g., cookies) on our Site to collect information about your device and about your activities on our Site, including which pages of our Site that you visit.

2. Data Collected through User Submissions

We collect and store information that you submit to us, including via registration or purchase activities. If you identify yourself by sending us an email, we collect and store your email address and any other information you provide in your email. As described in more detail in the “Use of Collected Data” section below, we use this information for our operational and commercial purposes, including to contact and/or identify you and/or send you information, including marketing information, about our products.

While using our Site, we may ask you to provide us with certain information, which we may also use for our operational and commercial purposes, including to contact and/or identify you and/or send you information, including marketing information, about our products. Such information includes:

- Email address
- First name and last name
- Phone number
- Address, City, State, Province, ZIP/Postal code, Country

You are not under any obligation to provide this information. However, if you withhold requested information, we may not be able to provide certain services to you.

We collect and store your information contained in user-generated content that you submit to us, or post about us, via social networks, such as Facebook, Instagram or TikTok, With your consent we may use such user-generated content on our media channels, including but not limited to email, digital or Internet, print, broadcast, out of home and social media. You may withdraw your consent in accordance with your rights outlined below.

3. Data Collected through User Visits, Interactions, and Activities

Use of Cookies and Other Online Tracking Technologies

We use cookies, pixels, and other online tracking technologies to collect information, including to understand visitor activity on our Site and to help improve visitors’ experience while using our Site.

A cookie is a small alphanumeric text file sent by a web server and placed on your computer by your web browser. Cookies can be divided into two different types: session and persistent. Session cookies are typically deleted when you close your browser. Persistent cookies, in contrast, remain stored on your computer after you close your browser until they are deleted either because they expire or you delete them.

The types of cookies we use are:

- **Session Cookies.** We use session cookies to operate our Site, for security purposes, and to customize our users’ experiences.
- **Persistent Cookies.** We use persistent cookies to remember your preferences and other information, including products you may be interested in, and various settings, and to customize our users’ experiences.

Cookies are often used in conjunction with other technologies to understand online behavior. For example, Bombas uses cookies in conjunction with pixels, which are small sections of code that we may place on our Site, to associate particular online activities to a browser or device (e.g., to understand that a browser or device has visited a specific page of our Site and/or to understand the total number of unique users that have visited a specific page of our Site).

We use session cookies in connection with our Site, for security purposes, and to provide you with customizations of your experience, such as highlighting your recently viewed items, to detect and remember your region and language preferences, and track your activities on our Site. We use persistent cookies to ensure that you are directed to the correct regional version of our Site, to remember items you may have put in your “Cart”, in connection with

“Tailored Advertising” (which associates a user’s activity and interest information, demographic information, geographic information, and similar information with a browser cookie or other online identifier in order to provide more useful and relevant advertising), and for other customization purposes. We may use the services of third-party providers in connection with our use of cookies.

None of these cookies is strictly necessary to access our Site. You may set your browser to refuse all cookies or to indicate when a cookie is being set. However, if you do not accept cookies, parts of our Site may function differently and you may not be able to use some portions or features of our Site. For more information about how to manage your cookies and your cookie preferences, please use the “help” menu of your web browser or explore the customer support sections of your web browser. To “opt out” of Tailored Advertising, please see the “Your Choices: Opt-Out/Right to Withdraw/Revoke Consent” section below.

Usage Data

We also collect certain additional passive tracking data concerning your device and how you access and use our Site (“Usage Data”). This Usage Data includes information such as your computer's Internet Protocol (“IP”) address, browser type, and browser version, as well as the pages of our Site that you visit, the times and dates of your visits, the time spent on, and interactions with, those pages, location data, and diagnostic data.

You can enable or disable location services when you use our Site at any time, through your device settings.

Analytics

We may use third-party technology providers to monitor and analyze the use of our Site. This includes Google Analytics - for more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <http://www.google.com/intl/en/policies/privacy/>.

Tailored Advertising

Bombas uses third-party services to advertise our products and services to you after you visit our Site. We and our third-party vendors use cookies and other online tracking technologies on our Site and in third-party services (including in emails and advertisements and on other digital properties) to track your activities across time and services for purposes of associating the different devices you use, and delivering relevant Tailored Advertising and/or other content to you and others on our Site and in third-party services or third-party digital properties after you have left our Site. This may include “retargeting” on social media platforms such as Facebook and Instagram. In addition to the use of such online tracking technologies, we may also upload customer lists (including email addresses) to third-party service providers, such as Facebook and Google, to have customized ads served to people (or people similar to people) who have visited our Site (“Matched Ads”). “Matched Ads” may be considered a kind of Tailored Advertising.

4. Information from Other Third Parties

We may also receive information about you from third parties, and we may use such information, by itself and/or in combination with information we collect from you, for our operational and commercial purposes, including to send you information, including marketing information, about our products.

5. Your Choices

Unsubscribe/Right to Withdraw/Revoke Consent

If you do not want us to contact you or send you information by email, postal mail and/or telephone, or if you would like to change any of the information that you have previously provided to us, please let us know by emailing us at privacy@bombas.com. In addition, you may also unsubscribe (i) from receiving our marketing and promotional emails by following the unsubscribe link in such marketing and promotional emails and/or (ii) from receiving our text message marketing by replying STOP (or CANCEL, UNSUBSCRIBE, END, or QUIT) to any such text message marketing.

Opt-Out/Right to Withdraw/Revoke Consent

You may refuse or remove persistent targeting cookies by:

- “Opting out” of “interest-based advertising”/“online behavioral advertising”/Tailored Advertising via third-party advertising cookies at the following websites:
 - <http://www.aboutads.info/choices/>
 - <http://youradchoices.ca/choices/>
 - youonlinechoices.com (by clicking the “Your ad choices” link after selecting the appropriate country)
- Adjusting your browser settings to refuse or remove cookies.

Please note that you need to configure each browser on each device that you use if you wish to opt-out or block some or all cookies for that browser. If you buy a new device, upgrade or change web browsers or delete your opt-out cookies, you will need to perform the applicable opt-out process again. In order for opt-out processes to work, your browser must be set to accept third-party cookies. Additional information about cookies is available at <https://youradchoices.com/choices-faq> and www.youonlinechoices.com (by clicking the “Frequently Asked Questions”/“FAQs” link after selecting the appropriate country).

You may also “opt out” of “interest-based advertising”/“online behavioral advertising”/Tailored Advertising in mobile application environments via the privacy settings on your mobile device, including by selecting “Limit Ad Tracking” in such privacy settings. Selecting such setting will result in the elimination of Tailored Advertising via the applicable mobile advertising ID (e.g., Apple IDFA or Google Advertising ID) on that mobile device.

In addition, you may opt-out of Matched Ads by emailing us at privacy@bombas.com, and specifying in your email that you wish to opt-out of Matched Ads.

Please note that there may be a slight delay between your unsubscribe and/or Matched Ads email opt-out elections and the processing of such elections. Please also note that we are not responsible for third parties’ failure to comply with opt-out instructions.

6. Use of Data

We use the information we collect and/or receive for our operational and commercial purposes, which may include:

- Product, Service, and Contract Fulfillment (including to manage, perform, and administer our contracts)
- Customer Support (including to manage and administer our relationships with our customers and potential customers, and to maintain and improve the experiences of our customers and potential customers)
- Quality Assurance and Supply Chain Management (including to assist in buying decisions)
- Site Performance and Administration (including to measure and analyze the number of visitors to different sections and pages of our Site, to determine how best to enhance the usability and performance of our Site, and to detect and prevent fraud)
- Marketing and Advertising (to send marketing information about our products and services to consumers, and to engage in advertising, including Tailored Advertising)
- Other Communications with Customers
- Internal Financial, Employment, and Administrative Purposes
- Compliance with Legal/Regulatory Obligations

7. Retention of Personal Information

Bombas will retain your personal information only for as long as is reasonably necessary for the purposes set out in this Privacy Policy. The criteria used to determine the retention periods include: (i) how long the personal information is needed to provide the services (including in connection with our guarantees) and operate the business; (ii) the type of personal information collected; and (iii) whether we are subject to a legal, contractual or

similar obligation to retain the data (e.g., mandatory data retention laws, government orders to preserve data relevant to an investigation, or data that must be retained for the purposes of litigation or disputes).

Bombas will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Site, or we are legally obligated to retain this data for longer time periods.

8. Transfer of Data

Your information, including personal data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction, in jurisdictions where the data protection laws may differ than those from your jurisdiction.

If you are located outside of the United States and provide information to us, please note that such information, including personal data, may be sent to, and processed in, the United States and/or other countries. By providing us with your personal data, **you consent to such transfers to and subsequent processing in such countries (including the United States), and if you are resident in the UK or EEA we will implement appropriate safeguards (namely, standard contractual clauses) for the transfer of your personal data to such countries, which your country may not consider to provide for adequate privacy protections.** Where transfers are reliant on consent, you may withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

9. Sharing and Disclosure of Data

Sharing

We may share your information with our authorized service providers that perform certain services on our behalf. These services may include fulfilling orders, processing payments, providing customer service and marketing assistance, performing business and sales analysis, supporting our Site functionality and supporting other features offered through our Site, and providing advertising and marketing services (including delivering Tailored Advertising and email marketing campaigns, and analyzing and improving the effectiveness of our advertising and marketing). These service providers may have access to personal information needed to perform their functions and are generally not permitted to share or use non-aggregated personal information for any other purposes. We may also share your personal information with Bombas affiliates. We may also share your personal information via our social network channels, such as Facebook and TikTok, where you have consented to our doing so. In addition, we may share your personal information with third-party advertising, marketing, and data service companies in connection with our use of their commercial data cooperative and data enrichment, verification, analytics, marketing and advertising products and services, which sharing may constitute a “sale” under the California Consumer Privacy Act (CCPA).

Disclosure for Law Enforcement or Legal Requirements

Under certain circumstances, Bombas may be required to disclose your information if required to do so by law or in response to valid requests by public authorities (e.g., a court or a government agency).

Bombas will disclose your information in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Bombas
- To prevent or investigate possible wrongdoing in connection with our Site
- To protect the personal safety of users of our Site or the public
- To protect against legal liability

10. Security of Data

Data security is important to us, but please keep in mind that no method of transmission over the Internet or method of electronic storage or transmission is 100% secure. While we strive to use reasonable and appropriate means to protect information, we cannot guarantee its absolute security. We do and will take reasonable and appropriate steps designed to ensure that your data is treated securely and in accordance with this Privacy Policy, and we will not transfer your personal data to an organization or a country unless there are adequate controls in place, including with respect to the security of your personal data.

In particular, we maintain technical and organizational measures appropriate to ensure a level of security appropriate to the risk, including strict procedures and security features to try to prevent unauthorized access.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. Bombas recommends referring to the UK National Cyber Security Centre published guidance for staying safe online.

11. "Do Not Track" Signals

We do not support browser "Do Not Track" (DNT) signals, and do not change any of our data collection or use practices when we receive such signals. Do Not Track is a preference you can set in your web browser. We will continue to evaluate potential responses to "Do Not Track" signals in light of industry developments or legal changes.

We are committed to honoring your privacy choices. For more information, please see the "Your Choices" section above.

12. Your California Privacy Rights under the California Consumer Privacy Act (CCPA)

If you are an individual who is a resident of California (a California "consumer"), you have the following rights under the California Consumer Privacy Act, which went into effect on January 1, 2020, with respect to your "personal information" (as defined by CCPA):

- **Right to Know.** You have the right to request that we disclose to you, following your "verifiable consumer request":
 - The categories of personal information we have collected (as defined by CCPA) about you
 - The categories of sources from which the personal information is collected
 - The business or commercial purpose for collecting personal information
 - The categories of third parties with which we share personal information
 - The specific pieces of personal information we have collected about you
 - The categories of personal information about you that we disclosed for a business purpose
 - If we sell your personal information:
 - The categories of personal information that we sold about you
 - The categories of third parties to which your personal information was sold, by category or categories of personal information for each category of third parties to which the personal information was sold
 - The business or commercial purpose for selling personal information
- **Right to Delete.** You have the right to request that we delete, following your "verifiable consumer request", the specific pieces of personal information we have collected about you.

- Categories of personal information we collect
- Specific pieces of personal information we have collected about you
- Categories of sources from which we collect personal information
- **Right to Opt-Out.** You have the right, at any time, to direct us not to sell your personal information. This right is different from the right to “opt out” of “interest-based advertising”/“online behavioral advertising”/Tailored Advertising described above in this Privacy Policy under the header “User Choice – Opt-Out/Right to Withdraw Consent”. (If you would like to opt-out of our Tailored Advertising, please refer to that section of this Privacy Policy.)
- **Right to Non-Discrimination.** We may not discriminate against you because you exercise any of your rights under CCPA, including by:
 - Denying goods or services to you
 - Charging you different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties
 - Providing a different level or quality of goods or services to you
 - Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services

The process we currently use to verify “requests to know” and “requests to delete” requires you to provide your email address, your postal address, and information about your Bombas purchase history.

Methods of Submitting Requests

If you are a California consumer, you may submit requests under CCPA to exercise your “right to know” or your “right to delete”, or to direct us not to sell your personal information by exercising your “right to opt-out”, via any of the following methods:

- **By web form**, available by clicking [HERE](#)
- **By email**, to: CAprivacy@bombas.com
- **By toll-free telephone**, to: 1-888-914-9661, PIN: 688703

We will maintain records of consumer requests made under CCPA and how we responded to those requests in accordance with CCPA.

Authorized Agents

If you are a California consumer, you may use an “authorized agent” (as defined by CCPA) to submit requests to exercise your “right to know”, your “right to delete” and/or your “right to opt-out” on your behalf under CCPA. Your authorized agent will need to provide us with a copy of a written permission that is signed by you and indicates that you have provided such authorization.

CCPA Personal Information

We collect (and during the last 12 months have collected) the following categories of personal information, from the following categories of sources, and for the following business or commercial purposes:

- **Category of Personal Information: Identifiers** (such as a real name, postal address, email address, an online identifier, or an internet protocol address)
 - **Categories of Sources:** We receive such information directly from consumers (such as when they complete a purchase on our Site) and/or from third-party vendors (such as vendors that use cookies and other online tracking technologies on our Site and in third-party services (including in emails and advertisements) and third-party data providers)

- *Business/Commercial Purposes*: For our operational and commercial purposes, including (i) managing, performing, and administering our contracts and relationships with consumers, (ii) sending information (including marketing information about our products) to consumers, (iii) engaging in Tailored Advertising, and (iv) selling such personal information to advertising, marketing, and data service companies (in connection with our use of their commercial data cooperative and data provision, enrichment, verification, analytics, marketing and advertising products and services)
- **Category of Personal Information: Characteristics of protected classifications under California or federal law** (such as gender and age)
 - *Categories of Sources*: We receive such information from third-party vendors, including vendors that perform analytics and Tailored Advertising services for us and third-party data providers
 - *Business/Commercial Purposes*: For our operational and commercial purposes, including engaging in Tailored Advertising and selling such personal information to advertising, marketing, and data service companies (in connection with our use of their commercial data cooperative and data provision, enrichment, verification, analytics, marketing and advertising products and services)
- **Category of Personal Information: Commercial information** (such as records of the products a consumer purchased)
 - *Categories of Sources*: We receive such information directly from consumers (based on the purchase activities of those consumers on our Site) and/or from third-party vendors (such as third-party data providers)
 - *Business/Commercial Purposes*: For our operational and commercial purposes, including
 - (i) managing our supply chain (including with respect to buying decisions),
 - (ii) managing, performing, and administering our contracts and relationships with consumers,
 - (iii) engage in Tailored Advertising, and
 - (iv) selling such personal information to advertising, marketing, and data service companies (in connection with our use of their commercial data cooperative and data provision, enrichment, verification, analytics, marketing and advertising products and services)
- **Category of Personal Information: Internet or other electronic network activity information** (such as browsing history, search history, and information regarding interactions with our Site and our advertising)
 - *Categories of Sources*: We receive such information from third-party vendors, including ad platforms and vendors that use cookies and other online tracking technologies on our Site and in third-party services (including in emails and advertisements)
 - *Business/Commercial Purposes*: For our operational and commercial purposes, including (i) managing our supply chain (including with respect to buying decisions), (ii) engaging in Tailored Advertising, and (iii) selling such personal information to advertising, marketing, and data service companies (in connection with our use of their commercial data cooperative and data provision, enrichment, verification, analytics, marketing and advertising products and services)
- **Category of Personal Information: Geolocation data**
 - *Categories of Sources*: We receive such information directly from consumers (such as when they complete a purchase on our Site) or from third-party vendors (such as third-party data providers)
 - *Business/Commercial Purposes*: For our operational and commercial purposes, including (i) managing, performing, and administering our contracts and relationships with consumers, (ii) sending information (including marketing information about our products) to consumers, and (iii) selling such personal information to advertising, marketing, and data service companies (in connection with our use of their commercial data cooperative and data provision, enrichment, verification, analytics, marketing and advertising products and services)
- **Category of Personal Information: Inferences** (drawn from any of the other categories of personal information of the information to create a profile about a consumer reflecting, for example, a consumer's product preferences)

- *Categories of Sources*: We receive such information from third-party vendors, including vendors that perform analytics and remarketing services for us
- *Business/Commercial Purposes*: For our operational and commercial purposes, including to engage in Tailored Advertising

Disclosure of Personal Information

- **“Disclosures for a Business Purpose”** We disclose (and during the last 12 months have disclosed) each of the above categories of personal information for a business purpose with our authorized service providers that perform certain services on our behalf, including fulfillment, shipping, and handling providers, payment service providers, data analytics providers, technology service providers, and advertising and marketing service providers and platforms. These services may include fulfilling orders, processing credit card payments, providing customer service and marketing assistance, performing business and sales analysis, supporting our Site functionality and supporting other features offered through our Site, and providing advertising and marketing services (including delivering Tailored Advertising and email marketing campaigns, and analyzing and improving the effectiveness of our advertising and marketing); and
- **“Sales”**: We “sell” (as defined by CCPA) (and during the last 12 months have sold) each of the above categories of personal information (other than “Inferences”) to advertising, marketing, and data service companies in connection with our, their, and their respective customers’ marketing, advertising, and other business and commercial activities (in connection with our use and/or their provision of their data cooperative and data provision, enrichment, verification, and analytics products and services). As of September 1, 2020, we resumed our sharing of personal information of California consumers with third-party data cooperative companies in connection with our use of their products and services; we previously shared such personal information with those companies prior to January 1, 2020, but ceased such sharing between January 1, 2020 and August 31, 2020. However, we do not knowingly sell the personal information of California consumers under the age of 16 without required affirmative authorization. If you are a California consumer, you have the right, at any time, to direct us not to sell your personal information; you may exercise such “Right to Opt-Out” under CCPA by clicking the link below, which takes you to the web form listed above under the header “Your California Privacy Rights under the California Consumer Privacy Act (CCPA) – Methods of Submitting Requests” (and available by clicking [HERE](#)), or by email to CAprivacy@bombas.com.

[DO NOT SELL MY PERSONAL INFORMATION](#)

13. Your California Privacy Rights under “Shine the Light”

California’s “Shine The Light” law permits certain individuals who are California residents to annually request and obtain information free of charge about what personal information is disclosed to third parties for direct marketing purposes in the preceding calendar year. We do not distribute your personal information to outside parties for their direct marketing without your consent, except as provided for in this Privacy Policy.

For more information, please email us at CAprivacy@bombas.com, with “California Shine the Light Privacy Request” in the subject line, and your full name, email address, postal address and specific services you have used in the body of your email.

14. Legal Bases (GDPR and LGPD)

The EU General Data Protection Regulation (GDPR) requires a “legal basis” for processing “personal data” (as defined by GDPR) of European Economic Area (which includes, for purposes of this Privacy Policy, Switzerland and the United Kingdom) (“EEA”) data subjects, and the Brazilian General Data Protection Law (LGPD) requires a “legal basis” for processing “personal data” (as defined by LGPD) of Brazil data subjects. If you are an EEA or Brazil data subject, Bombas’s legal basis for collecting, using, and disclosing the “personal data” described in this Privacy Policy will depend on the personal data we collect, the specific context in which we collect it, and the specific purposes for which we collect and use it, including as follows:

- **Purpose:** To respond to requests and questions, including about our products
 - *Legal Basis(es), if and to the extent applicable in the EEA or Brazil (with respect to “personal data” of EEA or Brazil data subjects, respectively):* Such responses may be necessary to manage and perform our contracts (including our Terms and Conditions) with the applicable data subject or to take steps at the request of the data subject prior to entering into a contract. In addition, we have a legitimate interest in managing our relationships with our customers and potential customers and to ensure that we are effective and efficient as we can be and that we optimize the experience and satisfaction of our customers.
- **Purpose:** To provide customer support
 - *Legal Basis(es), if and to the extent applicable in the EEA or Brazil (with respect to “personal data” of EEA or Brazil data subjects, respectively):* Such support may be necessary to manage and perform our contracts (including our Terms and Conditions) with the applicable data subject or to take steps at the request of the data subject prior to entering into a contract. In addition, we have a legitimate interest in providing customer support and in optimizing the experience and satisfaction of our customers.
- **Purpose:** To provide goods and services to our customers, and otherwise to perform our contracts with our customers
 - *Legal Basis(es), if and to the extent applicable in the EEA or Brazil (with respect to “personal data” of EEA or Brazil data subjects, respectively):* To manage and perform our contracts (including our Terms and Conditions) with the applicable data subject
- **Purpose:** To maintain, administer, improve, and customize our Site, products, and services
 - *Legal Basis(es), if and to the extent applicable in the EEA or Brazil (with respect to “personal data” of EEA or Brazil data subjects, respectively):* We have a legitimate interest in maintaining and improving the quality and efficiency of the products and services offered to our customers and potential customers, and in optimizing the experience and satisfaction of our customers. With your consent, if required by applicable law
- **Purpose:** The day-to-day running and management of our business and the products and services offered to customers
 - *Legal Basis(es), if and to the extent applicable in the EEA or Brazil (with respect to “personal data” of EEA or Brazil data subjects, respectively):* We have a legitimate interest in managing our business, including for operational purposes, such as supply chain management (including with respect to buying decisions) and financial, employment, and administrative decision-making.
- **Purpose:** For fraud prevention and detection and other security purposes
 - *Legal Basis(es), if and to the extent applicable in the EEA or Brazil (with respect to “personal data” of EEA or Brazil data subjects, respectively):* We have a legitimate interest in preventing and detecting fraud, especially in connection with our Site and our products and services.
- **Purpose:** In response to diligence investigation inquiries by third parties that are evaluating the prospect of acquiring all or part of our business, assets, or shares, or that succeed us in carrying on our business
 - *Legal Basis(es), if and to the extent applicable in the EEA or Brazil (with respect to “personal data” of EEA or Brazil data subjects, respectively):* We have a legitimate interest in managing our business, including for operational, financial, employment, and administrative purposes.
- **Purpose:** To enforce or defend our rights
 - *Legal Basis(es), if and to the extent applicable in the EEA or Brazil (with respect to “personal data” of EEA or Brazil data subjects, respectively):* To manage and perform our contracts (including our Terms and Conditions) with the applicable data subject and, if applicable, to comply with our legal or regulatory obligations
- **Purpose:** To investigate, manage, and resolve complaints and claims
 - *Legal Basis(es), if and to the extent applicable in the EEA or Brazil (with respect to “personal data” of EEA or Brazil data subjects, respectively):* To manage and perform our contracts (including our Terms and Conditions) with the applicable data subject and, if applicable, to comply with our legal or regulatory obligations
- **Purpose:** To investigate, manage, and resolve regulatory matters, investigations, and claims
 - *Legal Basis(es), if and to the extent applicable in the EEA or Brazil (with respect to “personal data” of EEA or Brazil data subjects, respectively):* To comply with our legal or regulatory obligations
- **Purpose:** To share data with police, law enforcement, tax authorities or other government agencies where we have a legal obligation and to comply with applicable laws, regulations or codes of practice

- *Legal Basis(es), if and to the extent applicable in the EEA or Brazil (with respect to “personal data” of EEA or Brazil data subjects, respectively):* To comply with our legal or regulatory obligations
- *Purpose:* To allow you to participate in interactive features of our Site when you choose to do so
 - *Legal Basis(es), if and to the extent applicable in the EEA or Brazil (with respect to “personal data” of EEA or Brazil data subjects, respectively):* With your consent, if required by applicable law
- *Purpose:* For marketing and advertising, including Tailored Advertising
 - *Legal Basis(es), if and to the extent applicable in the EEA or Brazil (with respect to “personal data” of EEA or Brazil data subjects, respectively):* With your consent, if required by applicable law
 If you no longer wish to consent to Tailored Advertising, you can withdraw your consent at any time (please see the “Your Choices: Opt-Out/Right to Withdraw/Revoke Consent” section above).
 If you wish to stop receiving marketing communications from us, you can unsubscribe by following the unsubscribe link in our marketing and promotional emails or the instructions provided in any other communication we send (Please see the "Your Choices: Unsubscribe/Right to Withdraw/Revoke Consent" Section above).
- *Purpose:* To share your user-generated content through our media channels
 - *Legal Basis(es), if and to the extent applicable in the EEA or Brazil (with respect to “personal data” of EEA or Brazil data subjects, respectively):* With your consent, if required by applicable law

15. Your Rights under GDPR

If you are an EEA data subject and certain requirements are fulfilled, you have the following data protection rights under GDPR:

- **Right of Access.** You have the right to access your personal data.
- **Right to Erase.** You have the right to have us erase your personal data.

If you wish to exercise your “Right of Access” or “Right to Erase”, please visit our [web form](#) or email us at EuropePrivacy@bombas.com. Please note that we may ask you to verify your identity before responding to such requests.

- **Right of Rectification.** You have the right to have your personal data rectified/updated if that information is inaccurate or incomplete.
- **Right to Object.** You have the right to object to our processing of your personal data carried out for our legitimate reasons and/or for direct marketing, including profiling that is related to such direct marketing.
- **Right of Restriction.** You have the right to request that we restrict the processing of your personal data (i.e., we would need to secure and retain the personal data for your benefit but not otherwise use it).
- **Right to Data Portability.** You have the right to be provided with a copy of your personal data in a structured, machine-readable and commonly used format (or have this transferred to a third party).

If you wish to exercise one of the above-mentioned rights, please send us your request via email to: EuropePrivacy@bombas.com. Please note that we may ask you to verify your identity before responding to such requests.

- **Right to Withdraw Consent.** You also have the right to withdraw your consent at any time where Bombas relied on your consent to process your personal data. If you wish to exercise such right with respect to “interest-based advertising”/“online behavioral advertising”/Tailored Advertising, you can do so through the mechanisms set forth in the “Your Choices: Opt-Out/Right to Withdraw/Revoke Consent” section above; and if you wish to exercise such right with respect to the advertising and marketing we communicate by email, postal mail, or telephone, please email us at EuropePrivacy@bombas.com (please see the “Your Choices: Unsubscribe/Right to Withdraw/Revoke Consent” section above).

You also have the right to complain to a data protection authority about our collection and use of your personal data. We would, however, appreciate the opportunity to address your concerns before you approach a data protection authority, and would welcome you directing an inquiry first to us at: EuropePrivacy@bombas.com.

16. Your Rights under LGPD

If you are a Brazil data subject and certain requirements are fulfilled, you have the following data protection rights under LGPD:

- **Right of Access.** You have the right to access your personal data.
- **Right of Deletion.** You have the right to have us delete your personal data.

If you wish to exercise your “Right of Access” or “Right of Deletion”, please visit our [web form](#) or email us at BrazilPrivacy@bombas.com. Please note that we may ask you to verify your identity before responding to such requests.

- **Right of Confirmation.** You have the right to have us confirm the existence of our processing of your personal data.
- **Right of Correction.** You have the right to have your personal data corrected if that information is incomplete, inaccurate, or out-of-date.
- **Right to Data Portability.** You have the right to be provided with a copy of your personal data in a structured, machine-readable and commonly used format (or have this transferred to a third party).
- **Right to Deny Consent.** You have the right to deny consent to the processing of your personal data for which we rely on your consent as a legal basis, and to information about the consequences of such denial. For more information, please see “Your Choices: Opt-Out/Right to Withdraw/Revoke Consent” and “Your Choices: Unsubscribe/Right to Withdraw/Revoke Consent” above and “Legal Bases” above.
- **Right to Know about Data Sharing.** You have the right to know about the entities with which we have shared your personal data. For more information, please see “Sharing and Disclosure of Data” above.

If you wish to exercise one of the above-mentioned rights, please send us your request via email to: BrazilPrivacy@bombas.com. Please note that we may ask you to verify your identity before responding to such requests.

- **Right to Revoke Consent.** You also have the right to revoke your consent at any time where Bombas relied on your consent to process your personal data. If you wish to exercise such right with respect to “interest-based advertising”/“online behavioral advertising”/Tailored Advertising, you can do so through the mechanisms set forth in the “Your Choices: Opt-Out/Right to Withdraw/Revoke Consent” section above; and if you wish to exercise such right with respect to the advertising and marketing we communicate by email, postal mail, or telephone, please email us at BrazilPrivacy@bombas.com.

17. Links to Third-Party Websites and Third-Party Features

There are a number of places on our Site where you may click on a link to access another party’s website that does not operate under this Privacy Policy. For example, if you click on an advertisement or a search result on our Site, you may be taken to a third-party website that we have no ownership or control. These third-party websites may independently solicit and collect from you and in some instances provide us with information about your activities on those websites. We strongly advise you to review the privacy policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

We may allow you to connect our Site to a third-party service or offer portions of our Site through a third-party service (“Third Party Features”). If you use a Third Party Feature, both we and the applicable third party may have access to and use information associated with your use of the Third Party Feature, and you should carefully review the third party’s privacy policy and terms of use. Some examples of Third Party Features include the following:

- **Liking, Sharing, and Logging-In.** We may embed a pixel or other technology on our Site that allows you to “like” or “share” content on, or log in to your Bombas account through, third-party services, including social networks such as Facebook. If you choose to engage with such a third-party service through our Site, we may collect any information you have authorized the third-party service to share with us (such as your user ID, billing information, public profile information, email address, birthday, friends list, and other account

and profile data). Likewise, if you choose to engage with such a third-party service through our Site or visit our Site while logged in to that third-party service on your device or through our Site, the third party may receive information about your activities on our Site and be able to associate that information with information the third party already has about you.

- **Brand Pages and Chatbots.** We may offer our content on social networks such as a Facebook and Twitter. Any information you provide to us when you engage with our content (such as through our brand page or via our chatbot on Facebook Messenger) is treated in accordance with this Privacy Policy. Also, if you publicly reference our Site on a third-party service (e.g., by using a hashtag associated with Bombas in a tweet or post), we may use your reference on or in connection with our Site.
- **Voice-Activated Skills.** We may offer skills through Alexa and other voice-activated platforms, and use the voice processing and other technologies discussed in the section entitled “Automatic Data Collection and Tracking” above. Any information you provide to us when you engage with our skills is treated in accordance with this Privacy Policy.

18. Children's Privacy

Our Site is not intended for children, and we do not sell products for purchase by children. We sell children's products for purchase by adults. If you are under 18, you may use our Services only with the involvement and permission of a parent or guardian. We do not knowingly collect personal information from children under the age of 13 without the consent of the child's parent or guardian. If you are a parent or guardian and you believe that your child has provided us with personal information, please contact us. (Please see the “Contact Us” section below.) If we become aware that we have collected personal information from children without verification of parental consent, we will take steps to remove that personal information from our servers.

19. Changes to this Privacy Policy

We may update our Privacy Policy from time to time. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page. We will let you know via a prominent notice on our Site, and we will update the "Effective Date" at the top of this Privacy Policy.

20. Contact Us

If you have any questions about this Privacy Policy or our privacy practices, or if you would like to contact our data protection representative, please feel free to contact us by email to privacy@bombas.com, by phone (1-800-314-0980), or by postal mail to the following address: Bombas LLC, 881 Broadway, 2nd Floor, New York, NY 10003, USA. If you are a California consumer and have any questions or concerns about our privacy policies or practices, please feel free to email us at CAprivacy@bombas.com. With respect to the EEA personal data we collect and the Brazil personal data we collect, Bombas is the controller responsible for such personal data. As the controller, we determine the purposes for which and the manner in which such personal data are, or are to be, processed with respect to our Site. If you are an EEA data subject and have any questions or concerns about our privacy policies or practices, please feel free to email us at EuropePrivacy@bombas.com. If you are a Brazil data subject and have any questions or concerns about our privacy policies or practices, please feel free to email us at BrazilPrivacy@bombas.com. If you experience difficulty in accessing any part of our services or this Privacy Policy, please feel free to call us at 1-800-314-0980 or to email us at hello@bombas.com.