

# Introduction

Walley's Heating & Air and our affiliated entities (together "Walley's", "we" or "us") provides this privacy policy (this "Privacy Policy") to inform users about our policies and procedures regarding the collection, use, processing, deletion, security, and disclosure of personal data and information that is subject to protection under applicable data protection, data privacy, and data security laws, including the California Consumer Privacy Act (as amended, the "CCPA") (such data and information collectively, "Personal Data") received from users of the website owned and operated by Walley's, at <https://walleyshvac.com> (the "Website") and received from other persons or entities that have entered into written agreements with us that expressly reference this Privacy Policy. We are committed to ensuring that we process your Personal Data in accordance with applicable data protection legislation and privacy and data security laws. Your use of the Website means that you accept and understand this Privacy Policy. Please do not use the Website or provide us with any Personal Data if you do not accept this Privacy Policy.

Walley's may from time to time update this Privacy Policy by posting an updated version of the Privacy Policy to the Website. The date on which this Privacy Policy was last updated is set forth below. Your use of the Website after any updated version is posted means that you accept and understand such updated Privacy Policy. In addition, the Website makes use of cookies as described in further detail below.

## Information Collected

We may collect the following Personal Data when you visit the Website or otherwise provide us with Personal Data in connection with the Website:

- A. Personal Data you provide when you complete forms available on the Website;
- B. Personal Data you provide when you contact us;
- C. Details of visits to the Website, including the volume of traffic received, logs, and the resources that you have accessed and the devices you have used to access such information; and
- D. Personal Data you provide in connection with your application for employment with Walley's.

The categories of Personal Data we have collected from individuals pursuant to this Privacy Policy over the last twelve (12) months include the following:

- Identifiers, such as name, contact details and address (including physical address, telephone number, email address and Internet Protocol address, which we may use to identify your geographic location); and
- Internet or other electronic network activity information, such as information regarding your use of the Website (e.g., cookies, browsing history and/or search history), as well as information you provide to us when you correspond with us in relation to your inquiries.

## How We Use Your Personal Data

We use your Personal Data for one or more of the following business purposes:

1. To understand your needs and provide you with better service;
2. To improve the Website and to notify you about changes to the Website in order to provide you with better service;
3. To communicate with you, including responding to requests for information submitted by you through the Website or to notify you of services we provide, events that we are hosting, employment opportunities, or publications that may be of interest to you to provide you with better products and services;
4. To keep a record of your relationship with us;
5. To evaluate and respond to your application for employment with Walley's;
6. To research and analyze users' demographic characteristics, interests, and behavior in an aggregated form in order to better understand and serve our users and improve the Website and its offerings;
7. For ongoing operations, administrative, accounting, reporting, account maintenance, and other processes;
8. To audit and verify the quality and effectiveness of the Website, services, and compliance;
9. To detect security incidents and to protect against malicious, deceptive, fraudulent, or illegal activity; and
10. To generally comply with U.S., state, local and non-U.S. laws, rules and regulations.

You may opt-in to certain kinds of marketing communications by contacting us and you may unsubscribe to receiving further communications by clicking on the “opt-out” or “unsubscribe” link provided in all our marketing emails or by using the contact details of this Privacy Policy.

## **With Whom We Share Your Personal Data**

We do not sell or rent any of the Personal Data we collect about you to third parties.

We do not disclose any Personal Data about you to third parties, except: (i) as permitted or required by law or regulation or pursuant to any legal process; (ii) in response to governmental, regulatory, law enforcement or judicial inquiries; (iii) to affiliates; (iv) to third party suppliers and service providers (including vendors providing hosting, database management, and development services related to the operation of the Website, outsourcing providers of our back-office and internal functions, technology service providers, and/or email marketing services related to events we are hosting, our publications, or other communications we may send to you); and (v) entities to whom we may transfer or merge parts of our business or our assets in a restructuring or in connection with a corporate transaction. If a change happens to our business, then the successor entity may use your Personal Data in the same way as set out in this Privacy Policy.

## **Links to Third Party Websites**

We may provide links to third party websites for your information or convenience. Such websites are independently operated and are not under our control, and the privacy practices of such third party websites are not governed by this Privacy Policy. We are not responsible for the content or privacy practices of such third party websites or any products or services offered through them or the confidentiality, use, processing and security of any Personal Data that you provide to such websites.

## **Cookies**

We use cookies and certain other technologies and tools on the Website to track user preferences. A cookie is a small text file that certain websites save on your device when you visit those websites. Cookies automatically collect information regarding how you access the Website (e.g., browser type, access times, Internet Protocol (“IP”) address) and information regarding the hardware and software that you use to access the Website.

We use cookies to improve your Website experience, provide additional security, and remember you when you return to the Website. A cookie cannot give us access to your computer or to information beyond what you provide us and we do not store Personal Data in cookies we create, but we do use encrypted information gathered from them to help improve your experience of the Website.

Furthermore, the <https://walleyshvac.com/> website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help us analyze how users use the websites and to improve the website services, communications and user experience. The information generated by the cookies about your use of the websites (including your IP address) will be transmitted to and stored by Google on servers controlled by Google in the United States or other jurisdictions selected by Google. Google will use this information for the purpose of evaluating your use of the websites, compiling reports on website activity and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where it is required to do so by law, or where such third parties process the information on Google's behalf or where Google is permitted to do so under its privacy policy. Please visit the Google Analytics privacy policy available at <https://policies.google.com/privacy> for additional information regarding how Google processes and protects your data collected through Google Analytics. By using the <https://walleyshvac.com/> website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

## **Our commitment to data security**

We consider the protection of Personal Data to be a sound business practice, and to that end we employ commercially appropriate organizational, physical, technical and procedural safeguards and measures to protect your Personal Data in our possession or under our control, to the extent possible, from unauthorized or accidental access and improper use.

Unfortunately, the transmission of information via the Internet is not completely secure, and we cannot guarantee the security of your Personal Data transmitted to or through the Website; any such transmission is at your own risk. Once we have received your Personal Data, we will use the procedures and security features described above to try to prevent unauthorized access of your Personal Data.

## **Notice to California Residents of Certain Rights under the CCPA**

This section outlines specific rights granted under the CCPA to individual California residents and provides information regarding how such California residents can exercise their rights under the CCPA. This section is only relevant to you if you are a resident of California as determined in accordance with the CCPA. Information required to be disclosed to California residents under the CCPA regarding the collection of their Personal Data that is not set forth in this section is otherwise set forth in this Privacy Policy.

Deletion Rights: You have the right to request that we delete any of your Personal Data that we retain, subject to certain statutory exceptions, including, but not limited to, our compliance with U.S., state, local and non-U.S. laws, rules and regulations. We will notify you in writing and provide an explanation if we cannot comply with a specific request.

Disclosure and Access Rights: You have the right to request that we disclose to you certain information regarding our collection and use of Personal Data specific to you over the last twelve (12) months. Such information includes:

- The categories of Personal Data we collected about you;
- The categories of sources from which the Personal Data was collected;
- Our business or commercial purpose for collecting such Personal Data;
- The categories of third parties with whom we share the Personal Data;
- The specific pieces of Personal Data we collected about you; and
- Whether we disclosed your Personal Data to a third party, and, if yes, the categories of Personal Data that each recipient obtained.

No Discrimination: We will not discriminate against you for exercising your rights under the CCPA, including by denying service, suggesting that you will receive, or charging, different rates for services or suggesting that you will receive, or providing, a different level or quality of service to you.

How to Exercise Your Rights: To exercise any of your rights under the CCPA or to access this notice in an alternative format, please submit a request on your behalf using any of the methods set forth in this Privacy Policy below.

## Privacy of Children

We do not seek to collect or maintain information (including Personal Data) on the Website from those we know are under the age of 18, and no part of the Website is structured to attract anyone under the age of 13. If we learn we have collected or received Personal Data from an individual under the age of 13, we will delete that Personal Data.

## **Contact Information**

If you have any questions, suggestions, or complaints regarding this Privacy Policy you may contact Walley's Heating & Air:

**Phone:** (603) 718-8545  
**Email:** [support@walleys.com](mailto:support@walleys.com)

**EFFECTIVE: May 02, 2023**