



NOBELUS, LLC

Privacy Policy

PLEASE READ OUR PRIVACY POLICY CAREFULLY BEFORE USING OUR WEBSITES OR PURCHASING OUR PRODUCTS. This Privacy Policy describes how we manage and process personal information when we make available our products to customers (the “Products”) and manage our business and other relationships (the “Services”), as well as when you use our websites <https://nobelus.com>, <https://shop.nobelus.com>, and <https://nobelusuniversity.com> (the “Websites”), or otherwise communicate with us.

We are committed to ensuring the privacy, security, and integrity of the personal information that you share with us or that we otherwise collect as we provide our Websites and these Products and Services. As described more fully below, we use the personal information we collect on a very limited basis for the provision of our Products and Services only, and we refrain from selling the personal information we collect.

1. Information We Collect

We may collect personal information directly from you, or we may collect personal information from third parties as we provide our Products and Services.

To the extent applicable, we indicate when we need personal information and the consequences for failing to provide it. If you do not provide personal information when requested, we may not be able to provide our Products or Services, if either the personal information is required to provide the Products or Services, or alternatively, we are legally required to collect it.

Below is a description of the different types of personal and business information we process or manage and the sources from which we collect that information:

- (a) **Business Inquiries:** If you contact us through one of our Websites, we will collect your name, company name (if any), telephone number, email address, type of inquiry, and any other information you voluntarily provide to us through our Websites.
- (b) **Advertising Inquiries:** If you contact us through paid search or paid media advertising, we will collect anonymized analytics data on demographics, day of the

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week clicked, access via desktop or mobile, keywords most commonly clicked on, number of impressions, clicks, click through rate and average cost per click. If you click through paid search or paid media advertising to one of our Websites and then complete a form, we will collect all of the foregoing information in form fills. For trade magazine digital advertising, we will collect general data on impressions, clicks and click through rate.

- (c) **Newsletter Subscriber:** If you subscribe to our newsletter and/or other communications, we will collect your name and email address.
- (d) **Prospect(s):** If you are a prospective customer of our business (“Prospect”), we will collect your name, company name (if any), telephone number, email address, product information, and any other information you voluntarily provide to us.
- (e) **Customer(s):** If you are a customer, we will collect your purchase information, payment information, billing address, and shipping address, in addition to your name, company name (if any), telephone number, email address, and any other information you provide to us. If you text our client care team via our text messaging system, we will also collect your name, text messages and any other information you provide to us.
- (f) **Customer(s) Seeking Credit:** If you are a customer seeking credit, then in addition to collecting the information we collect from customer(s) and prospective customer(s), we will also collect your federal EIN number, business entity and state of incorporation (if any), the date you first opened for business, home address, Dun & Bradstreet number, estimated annual sales, business bank name and address, business bank account number, business bank phone number, trade references and their phone numbers, home address, Dun & Bradstreet number, and estimated annual sales.
- (g) **Customer Accounts Receivables:** If you are a customer with an unpaid account receivable, then we will collect the contact name, the company name, address, phone number, email, account balance, days overdue, and copies of delinquent invoices. Except for the above-listed items, we do not collect business or personal information through our Websites or other marketing efforts.

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2. COOKIES AND OTHER TECHNOLOGIES

We may also collect personal information in the management and use of our Websites.

For example, if you use our Websites, we may collect the IP address of your computer and aggregate Website usage data on the browsing history, bounce rate, male vs. female, age range, desktop vs. mobile access, days of the week in which the Websites are accessed, and other usage data, including but not limited to browser type, pages viewed, length of time spent on the site, in order to enable us to better manage website traffic and to gather other analytics on the Website(s).

We may also use “cookies,” which are small data files placed and stored on your computer, to help you manage your use of our Websites. We use cookies in accordance with the terms of our Cookie Policy which is incorporated herein by reference.

We do not use web-based tracking technologies in our business. If we decide to employ web-based tracking technologies in the future, we will notify you of the change and provide information about the technologies we are using, how we use those technologies, how the technologies may affect you, and what you can do to modify or control them.

3. HOW YOUR INFORMATION IS USED

We will use your personal information only for the purposes disclosed at the time of collection or as otherwise set out in this Privacy Policy, unless we have your consent for another use, or unless such other use is required by law. The purposes which we use personal information, include the following:

- (a) **Respond to Inquiries.** To respond to business, advertising, and prospective customer inquiries;
- (b) **Provide Products and Services.** To provide Products to our customers and Services;
- (c) **Process Credit.** To process credit requests from our customers;
- (d) **Process Payments.** To process payments for Products;

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- (e) **Relationship Management.** To manage our relationships with business contacts, prospective customers, and customers;
- (f) **Communication.** To communicate with you and respond to an inquiry you make to us;
- (g) **Manage and Improve our Websites.** To manage and generate analytics for the improvement of our Websites;
- (h) **Manage and improve our marketing and advertising.** To manage and generate analytics for the improvement of our marketing and advertising.
- (i) **Improve Business Operations.** To administer, maintain, manage, and improve our business operations;
- (j) **Collect Accounts Receivables.** To collect our unpaid accounts receivables;
- (k) **Legal Defense or Compliance.** To defend our legal rights or comply with our legal obligations;
- (l) **Necessary Business Purposes.** For all other necessary business purposes; and
- (m) **Other Legal Purposes.** As otherwise required by law.

We do not use or process information for profiling purposes, and we do not sell personal information.

5. DISCLOSURE OF PERSONAL INFORMATION

We may disclose personal information only as described below:

- (a) **Provision of Products or Services.** As necessary to provide Products and perform the Services on behalf of our customers;
- (b) **Provision of Business Credit.** To our credit card processor as necessary to process payments for our Products.

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- (c) **Approval of Credit Requests.** To Dun & Bradstreet as necessary to approve credit requests on behalf of our customers.
- (d) **Communication.** To our employees, contractors, and third-party service providers, only as needed to manage our relationship with business contacts, prospective customers, and customers.
- (e) **Collection of Accounts Receivables.** As necessary to service and collect our accounts receivables.
- (f) **Judicial Process.** If required by law, or if we believe that the disclosure is required or necessary to protect our rights and/or comply with a judicial processing or legal process served on us.
- (g) **Market & Sell to Prospects, Customers.** To our employees, contractors and third-party service providers, only as needed to market and sell Products and Services to our customers and prospective customers.
- (h) **Aggregate Analytics Data.** To our employees, contractors, and third-party service providers, only as needed to understand how users use the Websites.
- (i) **Merger or Acquisition.** As part of the transaction in the case of a merger, sale, or other asset transfer of our business, or if we are involved in any transaction in which we will not continue our business or will be transitioning our Products and Services to another firm.
- (j) **Compliance and Legal Necessity.** To address legal concerns or liabilities, respond to suspected illegal activity or fraud, defend against legal claims, or respond to a potential threat to the physical safety of a third party.
- (k) **As required by Law.** We may share personal information with third parties upon receipt of your consent as required by law.

Except as expressly stated above, we do not disclose personal information and we do not share personal information to third parties for marketing and promotional purposes.

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For the avoidance of doubt, we do not sell personal information to third parties.

6. SHARING PERSONAL INFORMATION WITH LAW ENFORCEMENT

Please be advised that we may be required to share personal information in response to lawful requests by public authorities, including but not limited to national security or law enforcement requirements. Notwithstanding the foregoing, except to the extent we receive such a lawful request by law enforcement, we will share personal information with law enforcement only when law enforcement has hired us to provide Products or Services.

7. YOUR RIGHTS AND CHOICES

You should direct all questions about how we collect and use your personal information to Angela Mohni, VP of Marketing at Angie.mohni@nobelus.com or 1.800.895.2747.

As described above, you can choose not to provide personal information, but then you may not be able to take advantage of certain of our Products or Services.

You can add and update the personal information we have collected. Please direct all such addition or update requests to Angie.Mohni@nobelus.com or 1.800.895.2747.

You have the right to request access to or the deletion of your personal information. Please see "How to Submit a Verifiable Request" for further instructions on how to make your request.

8. YOUR RIGHTS WITH RESPECT TO YOUR PERSONAL INFORMATION

Depending on your state or other location of residence, you may have the following rights with respect to your personal information:

- (a) **Disclosure:** Right to request that we disclose personal information or categories of personal information that we collect, use, disclose, and sell; the purposes for which the categories of information collected by us are used; the sources of information from which we collect personal information; and the specific pieces of information we have collected on you;
- (b) **Deletion:** Right to request that we delete personal information we have collected from you;

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- (c) **Opt-Out:** Right to request that we opt you out of the sale, disclosure, or processing of your personal information;
- (d) **Opt-In:** Right to opt in for sensitive personal information processing;
- (e) **Non-Discrimination:** Right to non-discrimination;
- (f) **Correct:** Right to correct inaccurate personal information;
- (g) **Portability:** Right to the portability of your personal information;
- (h) **Limit:** Right to limit the use and disclosure of sensitive personal information collected about you; and
- (i) **Automated Decision Making:** Right to opt out of automated decision making.

We make every effort to extend all of the above-stated rights to all users of our Websites, business contacts, prospective customers, and customers, regardless of their state or other location of residence.

However, given the nature of our business, we may be subject to certain exemptions from these rights and be unable to extend them to you in all cases.

If you submit a request and we are unable to act for one of the reasons listed above or another reason, we will advise you accordingly and provide the reason for our denial. We will not discriminate against you because you exercised your rights.

9. CATEGORIES OF INFORMATION, SOURCES, USE, DISCLOSURE

The categories of personal and commercial information we have collected in the past twelve (12) months are as follows:

Category of Personal Data	Examples	How We Used It	From Whom it was Collected	Whom We Disclosed It To
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Identifiers	<ul style="list-style-type: none"> • Name • Email address 	<ul style="list-style-type: none"> • Responding to Inquiries • Relationship Management • Communication • Legal Purposes • Necessary Business Purposes 	<ul style="list-style-type: none"> • Business Contacts • Prospective Customers • Customers 	<ul style="list-style-type: none"> • Service Providers
Technical Identifiers	<ul style="list-style-type: none"> • Cookie ID • IP address • Browsing history • Website usage data • Marketing/advertising data 	<ul style="list-style-type: none"> • Improving Our Marketing and Advertising • Improving Our Websites 	<ul style="list-style-type: none"> • Users of our Websites • Prospective Customers • Customers 	<ul style="list-style-type: none"> • Service Providers • Employees • Contractors
Personal Data	<ul style="list-style-type: none"> • Name • Email Address • Telephone Number • Purchase history and information • IP address • Browing history 	<ul style="list-style-type: none"> • Responding to Inquiries • Relationship Management • Communication • Providing Products and Services • Processing Payments • Processing Credit • Legal Purposes • Necessary Business Purposes • Improving Our Websites 	<ul style="list-style-type: none"> • Business Contacts • Prospects • Customers 	<ul style="list-style-type: none"> • Service Providers • Employees • Contractors
Sensitive Personal Information	<ul style="list-style-type: none"> • Bank Account Number • Credit Card Account Number 	<ul style="list-style-type: none"> • Communications • Process Payments • Process Credit 	<ul style="list-style-type: none"> • Customers 	<ul style="list-style-type: none"> • Employees • Contractors

	<ul style="list-style-type: none"> • Social Security Number • Texts sent via messaging system 			<ul style="list-style-type: none"> • Service Providers
Commercial Information	<ul style="list-style-type: none"> • EIN Number • Company Name • State of Incorporation • Business Telephone No. • Business Shipping Address • Business Bank Account Number • Dun & Bradstreet Number • Estimated Annual Sales • Purchase history • Account Balance • Days Overdue • Unpaid Invoices 	<ul style="list-style-type: none"> • Relationship Management • Communications • Provide Products & Services • Process Payments • Process Credit • Collect Accounts Receivables 	<ul style="list-style-type: none"> • Prospects • Customers 	<ul style="list-style-type: none"> • Employees • Contractors • Service Providers

10. PROCESS USED TO VERIFY A REQUEST

If you make an access or a deletion request, you will be required to submit several identifying pieces of information including but not limited to your name address, and phone number. We will use this information to search our systems and determine if we have information about you. If we are able to locate information about you, we will fulfill your request. If we are not able to match all three pieces of information you submit, we may provide you with a report that includes the categories of information we collect, use, disclose and sell.

If you are an authorized agent, you will be required to submit your name, address, and phone number, as well as the name, address, and phone number of the person on whose behalf you are making a request. If we are able to locate the information about the person on whose behalf you are making the request, we will fulfill your request. As an authorized agent, you will also be required to complete a form certifying you have the right to make this request on behalf of the third party.



11. HOW TO SUBMIT A VERIFIABLE REQUEST

You can make or submit a request related to the exercise of your privacy rights by contacting Angela Mohni, VP of Marketing at Angie.Mohni@nobelus.com or 1.800.895.2747. You also may make a request in writing to the mailing address provided in Section 21 below.

12. DATA PROCESSORS

We may utilize certain third-party service providers, which may have access to personal information provided in conjunction with the Products and Services and perform the role of a third-party data processor. The name, location, business and website address of these third-party service providers is provided below, along with a description of the services they provide

Service Provider	Location	Business Address/Website Address	Services Provided
Salesforce, Inc.	US-San Francisco, CA	Salesforce Tower 415 Mission Street, 3rd Floor San Francisco, CA 94105 https://www.salesforce.com/	Cloud-based software services providing customer relationship management software
WP Engine, Inc.	US-Austin, TX	504 Lavaca St. Suite 1000 Austin, Texas 78701 https://wpengine.com/	Website hosting services
Hostgator	US-Houston, TX	5005 Mitchelldale Suite 100 Houston, TX 77092 https://hostgator.com	Website hosting services
The Adcom Group	US-Cleveland, OH	1468 W 9th St. Suite 600 Cleveland, OH 44113	Full-service digital marketing agency

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Google, Inc. (Google Analytics)	US-Mountain View, CA	1600 Amphitheatre Parkway Mountain View, CA 94043 https://marketingplatform.google.com/about/analytics/	Web analytics service that provides numerous analytical tools useful for insights on website performance and marketing campaigns
OffPrem Technology	US-Fishers, IN	12175 Visionary Way Fishers, IN 46038 https://offprem.tech/	Consulting services involving Salesforce suite of products
Osano	US-Austin, TX	3800 N Lamar Blvd Suite 200 Austin, Texas 78756 https://www.osano.com/	Software managing cookies, opt-ins, and opt outs
Infor	US-New York, NY	641 Avenue of the Americas, New York, NY 10011 https://www.infor.com	Enterprise software services for enterprise resource planning (“ERP”)
Nextiva	US-Scottsdale, AZ	9451 East Via de Ventura Scottsdale, AZ 85256 https://www.nextiva.com	VoIP communications services.

Microsoft Corporation	US-Redmond, WA	One Microsoft Way Redmond, Washington 98052-6399 https://www.microsoft.com	Software services
Ask Nicely Holdings, Inc.	US-Portland, OR	1615 SE 3rd Avenue, Floor 3 Portland, Oregon 97214 https://www.asknicely.com/	Cloud-based feedback software services
Avalara	US-Seattle, WA	255 S King St #1200 Seattle, WA 98104 https://www.avalara.com	Cloud-based tax compliance software services
FedEx	US-Memphis, TN	942 South Shady Grove Road Memphis, TN https://fedex.com	Shipping and mailing services
UPS	US-Atlanta, GA	55 Glenlake Pkwy NE Atlanta, GA 30328 https://ups.com	Shipping and mailing services

Check Point Software Technologies Ltd.	Israel/US	959 Skyway Rd #300 San Carlos, CA 94070 https://www.checkpoint.com/	Cloud-based software security services
Freshworks, Inc.	India/US	2950 S. Delaware Street, Suite 201 San Mateo, CA 94403 https://freshworks.com	Cloud-based software services for customer management
Keepit A/S	Denmark	Per Henrik Lings Allé 4, 7 th 2100 København, Denmark	Cloud-based data protection

		https://www.keepit.com/	platform services
Celonis, Inc.	US/ New York, NY	1 World Trade Ctr. Ste. 87 New York, NY 10007 https://celonis.com	Cloud-based automation software services
3Gtms, LLC	US/ Columbus, OH	8760 Orion PI Suite #300 Columbus, OH 43240 https://go3g.com/	Cloud-based transportation software services
Active Campaign, LLC	US/Chicago, IL	1 N Dearborn St FL 5 Chicago, IL, 60602-4349 https://postmarkapp.com	Email delivery platform
Qlik Technologies Inc.	US/ King of Prussia, PA	211 South Gulph Road Suite 500 King of Prussia, PA 19406 https://www.qlik.com/	Business intelligence and data analytics software
Ring Central, Inc.	US/ Belmont, CA	20 Davis Drive Belmont, CA 94002 https://www.ringcentral.com/	Cloud-based fax services
Smartsheet, Inc.	US/Bellevue, WA	500 108th Ave NE, #200 Bellevue, WA 98004 USA https://www.smartsheet.com	Cloud-based enterprise work management platform services
DocuSign, Inc.	US/San Francisco, CA	221 Main St. San Francisco, CA 94105 https://www.docusign.com	Customer agreement software services



Elavon, Inc.	US/Miami, FL	7750 SW 117 th Avenue, Suite 306 Miami, FL 33183 https://www.elavon.com/	Payment processing services
PSI-Prestige Services Inc.	US/ NE	21214 Schofield Drive Gretna, NE 68025 1(800) 523-2797	Collection services

The following entity is a subsidiary and affiliated company of our organization:

Company Name	Location	Address
Nobelus Europe, Ltd.	United Kingdom	Denmark House Victoria Way Studlands Park Industrial Estate Newmarket, UK CB8 7AU

13. NEVADA RESIDENTS

Nevada law gives Nevada consumers the right to request that a company not sell their personal information for monetary consideration to certain other parties. The right applies even if their personal information is not currently being sold. If you are a Nevada consumer and wish to exercise this right, please submit your request to us by sending an email to Angie.Mohni@nobelus.com or 1.800.895.2747. You also may make a request in writing to the mailing address provided in Section 21 below.

13. EUROPEAN UNION RESIDENTS

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If you are a resident of the European Union, you have additional rights with respect to your personal information:

- (a) **Transfer Right.** Right to transfer any personal information we have collected by requesting a copy in a commonly used format that can then be imported by a third party;
- (b) **Correction Right.** Right to correct any personal information that we have collected that is inaccurate or incorrect;
- (c) **Right to Object.** Right to object to our continued storage, use or sharing of your personal information; and
- (d) **Right to Withdraw Consent.** Right to withdraw consent to our communications with you.

To make a request based on any of the above rights, please submit your request to this email address: Angie.Monhi@nobelus.com. You also may make a request in writing to the mailing address provided in Section 21 below.

14. ALTERNATIVE FORMAT REQUESTS

If you have a physical disability you have the right to request this privacy policy in an alternative format. To make a request for an alternative format, please submit your request to angie.mohni@nobelus.com or call us at 1.800.895.2747. We also accept requests made in writing to the mailing address provided in Section 21 below.

15. CHILDREN'S INFORMATION

Our Products and Services are not directed to or intended for children under the age of eighteen (18), and we do not knowingly or intentionally collect personal information from children. If you learn that your child has provided us with personal information without your consent, you may contact us as provided in Section 21 below. If we learn that we have collected any personal information in violation of applicable law, we will promptly delete such information.

16. DATA TRANSFER, STORAGE, & PROCESSING

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If you are accessing our Websites or Services from Canada, the United Kingdom, Australia, the European Union, Asia, or any other region with laws or regulations governing personal data collection, use, and disclosure that differ from United States laws, please be advised that your personal information will be transferred to, stored, and processed in the United States. We take steps to ensure that the service providers that we work with utilize industry best practices for maintaining data privacy and security.

If we are transferring personal information out of the European Union, please be advised that we will take such measures as are necessary to ensure that any transfer is in compliance with the EU General Data Protection Regulation (Regulation 2016/679 also known as the “GDPR”), including but not limited to transferring the personal data to a recipient in the United States that has executed standard contractual clauses adopted or approved by the European Commission and has certified under the EU-US Data Privacy Framework (“DPF”) Program. We acknowledge and agree that we are liable for all onward data transfers.

17. LINKS TO OTHER WEBSITES

Our Websites may link to other websites maintained by third parties. Any such third-party websites will employ their own privacy practices and be subject to their own privacy policies. We are not responsible for the policies or privacy practices of third-party websites.

18. SECURITY

We have implemented commercially reasonable security measures and follow generally accepted industry standards to protect all personal information in our possession, which includes employing commercially reasonable administrative, physical, and technical safeguards to maintain the confidentiality and security of all personal information.

To protect the information delivered to us, personal information is encrypted using a 256-bit secure sockets layer (SSL) software technology. SSL security only works on SSL-enabled browsers. In addition, we employ multifactor authentication as well as managed system detection and response software to monitor our systems against unauthorized intrusions.

Although we strive to protect your personal information, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. Although we make every effort to protect personal information, we cannot guarantee its absolute security.

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19. DATA RETENTION

We delete or destroy personal information when it is no longer necessary for the purpose in which it was collected, unless we are required by law to keep it for longer. We also destroy documents containing credit card information after it is no longer needed.

20. CHANGES AND UPDATES TO THIS PRIVACY POLICY

We may amend this Privacy Policy at any time at our sole discretion and without prior notice. If we make any material amendments, we will advise you about those changes by notifying you in a prominent place on each Website. You should check back with us from time to time in order to confirm that there have been no significant changes.

Please note that the use of information that we gather is subject to the Privacy Policy then in effect at the time of use.

21. CONTACT US

If you have any questions or concerns over this Privacy Policy or if you need further information regarding the access to your personal information, or how your personal information is used, you may contact us at:

Attn: Angela Mohni, VP of Marketing
Nobelus, LLC
4841 Lumber Ln
Knoxville, TN 37921

22. CORPORATE INFORMATION

Nobelus, LLC is a limited liability company, which is organized under the laws of the State of Tennessee. Our corporate headquarters are located at 4841 Lumber Ln., Knoxville, TN 37921. Our subsidiary and affiliated company is listed in Section 12 above.

23. EFFECTIVE DATE

This Privacy Policy was last modified on September 26, 2024.

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