Privacy Policy

Lawson and Co Inc. D/B/A Medallion Paint (together with its subsidiaries, collectively "Lawson and Co Inc. D/B/A Medallion Paint" or "we") recognizes and respects the privacy of individuals whose Personal Information it collects and otherwise processes in the course of conducting business. We are committed to ensuring that we process Personal Information in accordance with applicable privacy laws and regulations and this Privacy Notice.

This Privacy Notice applies to the Personal Information, Including Personal Data, processed in relation to current, prospective and former Medallion Paint customers, cardholders who transact with our customers (including individuals who maintain a card with one of our financial institution clients), job applicants and current and former Medallion Paint colleagues.

This Privacy Notice (together with Medallion Paint's terms of use and any other documents referred to herein) sets out the basis on which any Personal Information Medallion Paint collects, uses, shares and otherwise processes. Please read the following carefully to understand Medallion Paint's views and practices regarding Personal Information and how Medallion Paint will treat it. By accessing and using Medallion Paint's Services, including Medallion Paint's interactions with you via our websites, mobile sites and applications ("Sites and Services"), you agree to the processing of Personal Information as set out in this Privacy Notice.

When Medallion Paint uses the word 'card' in this Privacy Notice, it applies to all payment methods and types and not simply those involving a physical card; and use of the term 'cardholder' applies to any shopper or individual whose payment transactions may be processed.

This Privacy Notice is global in scope, but is not intended to override any legal rights in any territory where such rights prevail. In such event, the rights and obligations set out in this Privacy Notice will apply, subject only to amendment under any applicable local law having precedence.

What Personal Information Do We Collect?

Medallion Paint collects Personal Information relating to cardholders, merchants or other customers, suppliers and other business partners in order to carry out its business activities. Medallion Paint may collect Personal Information from various sources, including:

1. Information you voluntarily provide, either directly or via our customers;

2. Information automatically collected when you use our Sites and Services, including in our role as a payment processor.

This Personal Information may include:

- Contact information
- Payment transaction information
- Financial and credit card information

Contact Information, including: name (first, last and business), telephone numbers, address (home, billing and business), fax, email address and other communications;

Information related to items purchased, including: location of the purchase, value, time, method, any feedback that is given in relation to such purchase;

Payment transaction information, including: Alternative Payment Methods ("**APMs**"), transaction monitoring, fraud monitoring, products/services, trend analysis, analytics;

Financial and credit card information, including: payment account number (PAN) or account number, card expiration date, CVC details, bank and/or issuer details.

Individuals Privacy Rights

Under the EU's General Data Protection Regulation, individuals located in Europe are able to exercise rights regarding their Personal Information. You can find a more detailed summary of these rights on the Information Commissioner's Office's website <u>here</u>. These rights include:

- the right to access;
- the right to rectification;
- the right to restriction;
- the right to erasure;
- the right to object; and
- the right to data portability.

If your request cannot be provided within the required time frame, Medallion Paint will provide you with a date when the information will be provided. If your request is denied, Medallion Paint will provide an explanation as to why it has been denied.

Individuals in Andorra, Argentina, Australia, Canada, Faroe Islands, Guernsey, Hong Kong, Israel, Isle of Man, Japan, Jersey, Mexico, New Zealand, Singapore, South Korea, Switzerland, Uruguay, and certain other jurisdictions may also exercise these or similar rights.

California's "Shine The Light" law permits California residents free of charge to annually request and obtain a list of certain categories of Personal Information disclosed to third-parties for direct marketing purposes in the preceding calendar year and the names and addresses of such third parties and such further information sufficient to give the

customer a reasonable indication of the nature of the third parties' business. Please send any such request to the contact address below, and Medallion Paint will respond within 30 days.

The laws of other territories applicable to your dealings with Medallion Paint may also be relevant (and may also impact the above rights). Any such rights can be progressed through our customer services center or via the 'contact us' section below. However, all cardholder requests must first be directed to the relevant customer. Medallion Paint will assist customers with such requests accordingly.

How do we ensure the security of Personal Information

Medallion Paint works to maintain your confidence and trust in us and has therefore implemented physical, technical, and administrative measures designed to secure Personal Information from accidental loss, unauthorized access, use, alteration and disclosure. However, the safety and security of your information is also dependent upon you. We store and process your information on our servers located within the United Kingdom and the United States and use other computing facilities around the globe. Where Medallion Paint has given you (or where you have chosen) a password or access code which enables you to access certain parts of Medallion Paint's website/portal or mobile applications and similar, you are responsible for keeping this password and/or access code confidential. You should not share your password or access code with anyone and you should use all reasonable methods to ensure that there is no unauthorized use. You therefore authorize Medallion Paint to act upon instructions and information received from any person that enters your user ID and password and you agree to be fully responsible for all use and any actions that may take place during the use of your account. You also agree to promptly notify Medallion Paint of any information you have provided which has changed.

Unfortunately, the transmission of information via the internet is not completely secure. Although Medallion Paint will take reasonable steps to protect your Personal Information, Medallion Paint cannot guarantee the security of your data transmitted to Medallion Paint's site; any transmission is at your own risk.

Medallion Paint maintains security standards that are designed to protect your information as it is transmitted from your computer to our network. This technology is called Secure Socket Layer (SSL). SSL is a leading security protocol for data transfer on the Internet and helps to protect the safety and confidentiality of your online banking information.

You have a role in helping Medallion Paint by safeguarding your information from others. You have several options when deciding how you can best protect your Personal Information. One option is simply not to volunteer it. The Federal Trade Commission's websites (<u>www.ftc.gov</u>, <u>www.ftc.gov/idtheft</u>, and <u>www.onguardonline.gov</u>) offer useful information about how to protect your Personal Information.