Privacy Policy



Effective Date – July 19, 2017

Thank you for using this service, which is owned and operated by Cobeal, S.A. de C.V. ("Cobeal," "we," "us," and "our"). This Online Privacy Policy (this "Policy") describes the information we collect from or about you through the Cobeal-owned websites and mobile apps on which it posted (collectively referred to as this "Site"). It also describes how we use and share that information and some of the steps we take to protect your privacy.

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Scope of This Policy

This Policy applies only to information collected through this Site. It does not apply to third-party websites or third-party mobile apps. It also does not apply to information collected through other channels, such as over the phone or in person.

Some of the information Cobeal collects through this Site may be "personal information" – information that identifies you personally, alone or in combination with other information available to us. Other information may be non-personally identifiable information, such as information collected by cookies.

Cobeal has provided this Policy so that you will know what information Cobeal collects, how Cobeal uses this information, the types of third parties with whom Cobeal may share this information, and some of the choices that are available to you.

This Policy may be supplemented or amended from time to time by additional privacy notices ("Privacy Notices"), provided at the time we collect your information. For example, certain pages of this Site may contain Privacy Notices providing more details about the information we collect on those particular pages, why we need that information, and choices you may have about the ways we use that information. In other cases, specific Privacy Notices may be required to comply with the privacy laws of one of the countries, provinces, or states in which we do business.

Your Consent

By using this Site, you are consenting to the collection, use, disclosure, and transfer of your information as described in this Policy (and any Privacy Notices that apply to you). If you do not consent to the collection, use, disclosure and transfer of your information as described in this Policy (and any Privacy Notices that apply to you), you may not use this Site.

You may call +52 55 4324-7603 to request literature, find a local representative, request an appointment, or for other customer service. If you have questions about this Policy, or any Privacy Notice, please contact us via e-mail at admin@Cobeal.com.

Your Choices

In General: We respect your right to make choices about the ways we collect, use, and disclose your information. This Policy describes some of your choices, such as your choice to opt out of receiving "cookies." We may ask you to indicate your choices at this time and on the page where you provide your information.

Email preferences: We will include an "opt out" link in each electronic newsletter or promotional email we send you, so that you can inform us that you do not wish to receive such communications from us in the future.

Previously Expressed Preferences. You may change previously expressed preferences regarding how we use your information. If at any time you wish to be taken off our mailing lists, please contact us using the information provided below.

This Policy May Change

Cobeal reserves the right to update or modify this Policy and any Privacy Notice, at any time and without prior notice, by posting the revised version of the Policy or Privacy Notice on this Site. These changes will only apply to the information we collect after we have posted the revised Policy or Privacy Notice on this Site.

Your use of this Site following any such change constitutes your agreement that all information collected from or about you after the revised Policy is posted will be subject to the terms of the revised Policy. You may access the current version of this Policy at any time by clicking on the link marked "Privacy" at the bottom of each page of the public areas of this Site.

Information We Collect

Information You Manually Provide: Cobeal collects the information you manually provide (using your keyboard, mouse, or touchpad) when you use this Site, for example, we collect the information you provide when you request an appointment, literature, or services, or when you e-mail us with questions or feedback.

Information from Third-Party Social Media Platforms: You may be able to register with, log on to, or enhance your profile on this Site by choosing to automatically populate the requested data fields with information you previously provided to a third-party social media platform (such as Facebook or Twitter). By doing this, you are asking the third-party platform to send us information from your profile on that platform. We treat that information as we do any other information you give to us when you register, log on, or enhance your profile.

Information Sent to Us by Your Web Browser: Cobeal collects information that is sent to us automatically by your web browser. This information typically includes the IP address of your Internet service provider, the name of your operating system, the name and version of your browser, the date and time of your visit, and the pages you visit. The information we receive depends on the settings on your web browser. Please check your browser if you want to learn what information your browser sends or how to change your settings.

The information we receive from your web browser is not, in and of itself, personally identifiable. Generally, we use this information to help us improve this Site (for example, by making it more compatible with the technology used by our visitors) and to improve our marketing efforts (for example, by identifying your general geographic location). However, we may combine it with other information in an attempt to identify you or we may combine it with information that does identify you. We may also review our server logs for security purposes – for example, to detect intrusions into our network – and we might share our server logs, which contain visitors' IP addresses, with the appropriate investigative authorities who could use that information to trace and identify you.

More about IP Addresses: Your IP address is the identifier assigned to your particular computer or other device when you access the Internet. Depending on how you connect to the Internet, your IP address may always be the same, or it may change each time you access the Internet. IP addresses do not include your name, email address or other personal information, but in some cases, they may be linked to your personal information. For example, if you have registered with this Site, we may link your IP address to account information that identifies you personally. We may also provide your IP address to our third-party service providers who can use it to identify information such as your state and zip code. If we suspect inappropriate or criminal activity or a threat to our Sites or their users, we may also share our server logs – which contain users' IP addresses – with the appropriate investigative authorities, who could use that information to trace and identify individuals.

Information from Your Mobile or Tablet Device: Likewise, if you access this Site through your mobile or tablet device, we may automatically collect certain information from or about your device. The types of information we may collect include the type of

device you use, the IP address of your device, your device's operating system, the type of mobile or tablet Internet browsers you use, and information about the way you use our mobile or tablet application. This information is not, in and of itself, personally identifiable, but we may combine it with other information in an attempt to identify you or we may combine it with information that does identify you.

Information Collected by Cookies and Other Technologies: We use "cookies" and other technologies to collect information and support certain features of this Site. For example, we may use these technologies to:

- collect information about the ways visitors use this Site which pages they visit, which links they use, and how long they stay on each page;
- support the features and functionality of this Site for example, to save you the trouble of reentering information already in our database or to prompt the settings you established on previous visits;
- personalize your experience when you use this Site; and
- improve our marketing efforts, including through use of targeted advertising.

One of the ways we personalize your experience through the use of cookies is by placing a cookie on your computer that contains the zip code you provide to us. As you browse this Site, our web server will recognize your zip code and show you products and services available in your area.

The information we collect using cookies and similar technologies is not, in and of itself, personally identifiable, but we may link it to personal information that you provide. If you do not wish to receive cookies, you may set your browser to reject cookies or to alert you when a cookie is placed on your computer. You can also clear your cookies at any time through your browser's settings. Although you are not required to accept cookies when you visit this Site, you may be unable to use all of the functionality of this Site if your browser rejects our cookies.

Information About Third-Party Cookies

In addition to the cookies Cobeal delivers to your computer or mobile device through this Site, certain third parties may deliver cookies to you for a variety of reasons. For example, we use Google Analytics, a web analytics tool that helps us understand how visitors engage with our Sites. To learn more about Google Analytics, click here.

Other third parties may deliver cookies to your computer or mobile device for the purpose of tracking your online behaviors across non-affiliated websites and delivering targeted advertisements either on this Site or on other websites.

You have choices about the collection of information by third parties on our Sites. For example, if you don't want information about your visit to this Site sent to Google Analytics, you may download an Opt-out Browser Add-on by clicking here. Please note that the Add-on does not prevent information from being sent to Cobeal.

In addition, if you would like to opt out of having participating entities collect your online behavior for advertising purposes when you are browsing our websites, click here for a "Website Opt Out." You will be directed to an industry-developed website that allows you to choose whether each listed entity may collect and use data for interest-based advertising purposes. It may be that some of the third parties that collect interest-based information on this Site do not participate in the Website Opt Out, in which case the best way to avoid third-party tracking of your online behaviors may be through your browser settings and deletion of cookies.

The Website Opt Out described above works only on websites. To opt out of having participating entities track your behaviors for advertising purposes when you are using our mobile apps, download and use the Digital Advertising Alliance's "App Choices" app. As with the Website Opt Out, the "Mobile App Opt Out" prevents tracking only by participating entities.

Please note that the Website Opt Out and Mobile App Opt Out are device specific. If you wish to opt-out from having interest-based information collected by participating entities across all devices, you need take the steps outlined above from each device.

How We Use Your Information

Generally, we use the information we collect through this Site:

- to provide the information, products and services you request;
- to provide you with effective customer service;
- to provide you with a personalized experience when you use this Site;
- to contact you with information and notices related to your use of this Site;
- to contact you with special offers and other information we believe will be of interest to you (in accordance with any privacy preferences you have expressed to us);
- to invite you to participate in surveys and provide Feedback to us (in accordance with any privacy preferences you have expressed to us);
- to improve the content, functionality and usability of this Site;
- to better understand your needs and interests;
- to improve our products and services;
- to share with others as described in this policy;
- to improve our marketing and promotional efforts;
- · for security, credit or fraud prevention purposes; and
- for any other purpose identified in an applicable Privacy Notice, click-through agreement or other agreement between you and us.

How We Share Your Information

With Third–Party Vendors: Cobeal shares information collected through this Site with third-party vendors who act for us or on our behalf. For example, we may use third-party vendors to design and operate this Site; to conduct surveys; and to help us with our promotional efforts. These third-party vendors may need information about you to perform their functions.

With Other Users of this Site: You may be able to submit User-Generated Content on or through this Site. In this Policy, "User-Generated Content" or "UGC" refers to any content that you post using the social networking or product review tools we make available to you and that does not constitute "Feedback" (as that term is defined in our Terms of Use. Any personal information contained in UGC can be read, collected, or used by others. In addition, we may use UGC you submit for advertising campaigns and other promotions. We may or may not use your name in connection with such use, and we may or may not seek your consent before using the content for such purposes. Therefore, you should have no expectation of privacy with respect to UGC you submit on or through this Site.

With Third-Party Social Media Platforms: We may provide functionality on this Site that allows you to automatically post information about the actions you take on this Site to a third-party social media platform (such as Facebook or Twitter). If you choose to take advantage of this functionality, people with access to your profile on the third-party platform may be able to see the actions you have taken – for example, the items you have purchased. Thus, you should have no expectation of privacy in those actions. Further, if you choose to link your profile on this Site with an account on a third-party social media platform, we may share the information in your profile with that third-party platform.

With Our Distributors, Licensees and Other Affiliates: Cobeal may share the information collected through this Site with its affiliates, licenses and independent distributors (collectively "distributors"). Our distributors may use the information in all the ways listed in this policy, provided that such use relates to products or services authorized by Cobeal. For example, if you request an appointment, we will need to share your information with a Cobeal expert near you to schedule an appointment. Our distributors may also use your information for their own marketing purposes, provided such marketing relates to products or services authorized by Cobeal – they may not use your information to promote competing windows or doors or other products or services not authorized by Cobeal.

With Other, Carefully Selected Business Partners: From time to time, we may share your information with selected third parties (other than our third-party vendors or distributors) for joint or their own marketing purposes. Before doing so, however, we may offer you the opportunity to "opt out" or "opt in," as required by applicable law.

As Part of a Business Transfer: Your information may be transferred to successor organization if, for example, we transfer the ownership or operation of this Site to another organization or if we merge with another organization. If such a transfer occurs, the successor organization's use of your information will still be subject to this Policy and the privacy preferences you have expressed to us.

To Comply with Laws and Protect Our Rights and the Rights of Others: We may disclose your information when we, in good faith, believe disclosure is appropriate to comply with the law, a court order or a subpoena. We may also disclose your information to prevent or investigate a possible crime, such as fraud or identity theft; to protect the security of this Site; to enforce or apply our online Terms of Use or other

agreements; or to protect our own rights or property or the rights, property or safety of our users or others.

As Described in a Privacy Notice or click-through agreement: We reserve the right to disclose your information as described in any Privacy Notice posted on a page of this Site where you provide that information. By providing your information on that page you will be consenting to the disclosure of your information as described in that privacy notice. We also reserve the right to disclose your information as described in any click—through agreement to which you have agreed.

How We Protect Your Information

Cobeal takes reasonable precautions to provide a level of security appropriate to the sensitivity of the information we collect. Although we use reasonable measures to help protect your information against unauthorized use or disclosure, we cannot guarantee the security of information provided over the Internet or stored in our databases and will not be responsible for breaches of security beyond our reasonable control.

A Note About Children's Privacy

You must be at least 13 years old to have our permission to use this Site. We do not knowingly collect, use or disclose personal information about visitors under 13 years of age. If you are under the age of 13, you can use this service only in conjunction with your parent's or guardian's permission.

Links to Other Websites

This Policy applies only to this Site. Cobeal and its distributors operate many different websites for different purposes and in different countries, where different laws may apply. If you visit another Cobeal website, please take a moment to review the privacy policy posted on that site to learn what information may be collected through that site and how it is processed.

This Site may also contain links to websites that are not operated by Cobeal or its distributors. These links are provided for your reference and convenience only and do not imply any endorsement of the products sold or information provided through these websites, nor any association with their operators. Cobeal does not control these websites and is not responsible for their data practices. Any information you provide to third parties on their websites is covered under their privacy and data collection policies and is not covered by this Policy. We urge you to review the privacy policy posted on any site you visit before using the site or providing any personal information.

Access to Your Information

If you would like to review, correct and update the personal information you have provided to us through this Site, please contact us by email at admin@cobeal.com. We will respond to your request within the time limit set out by the applicable privacy

legislation. We will use reasonable efforts to comply with your request as required by applicable law.

Retention of Personal Information

Cobeal retains the personal information collected on this Site as long as necessary to provide the services, products and information you request or as permitted by applicable law.

This Site Is Hosted on Servers Located in the United States.

Cobeal is based in Mexico. The servers that support this Site may be located in the United States or other countries. Data protection laws vary from country to country; however, we will process your information in accordance with this Policy no matter where your data is stored. If you are located in a country outside the United States, by using this Site you consent to the transfer of your information to the United States.

Governing Law

This Policy shall be governed under the laws of California, United States of America without regard to its conflicts of law provisions.

Questions About This Policy or Cobeal's Data Practices

If you have questions or concerns about this Policy, any Privacy Notice, or Cobeal's data practices, please contact us by email at admin@cobeal.com.