

Privacy Policy

1. Sites covered by this Policy Statement

This Privacy Statement applies to all LCL Spas company owned websites and domains, and our wholly owned subsidiaries LCL Spas websites.

Links to non LCL Spas websites

The LCL Spas websites may provide links to third-party websites for your convenience and information. If you access those links, you will leave the LCL Spas website. LCL Spas does not control those sites or their privacy practices, which may differ from LCL Spas. We do not endorse or make any representations about third-party websites. The personal data you choose to give to unrelated third parties is not covered by the LCL Spas Privacy Statement. We encourage you to review the privacy policy of any company before submitting your personal information. Some third-party companies may choose to share their personal data with LCL Spas; that sharing is governed by that third-party company's privacy policy.

2. Types of information we collect

This Privacy Statement covers personal information, non-personal data collection and aggregate reporting.

Personal information is information that is associated with your name or personal identity. LCL Spas uses personal information to understand better your needs and interests and to provide you with better service. Once you choose to provide us with personal information, you can be assured it will be used only to support your customer relationship with LCL Spas. We take seriously the trust you place in us. LCL Spas will not sell, rent or lease your personal information to others.

On some LCL Spas websites, you can order products or services, request information, subscribe to marketing or support materials, register yourself or your LCL Spas products, or apply for a job at LCL Spas. The types of personal information you provide to us on these pages may include name, address, phone number, e-mail address, user IDs and passwords, billing and transaction information, credit card information, contact preferences, educational and employment background, and job interest data.

Non-personal information is data about usage and service operation that is not associated with a specific personal identity. LCL Spas collects and analyzes non-personal information to evaluate how visitors use the LCL Spas websites.

Non-personal data we collect may include the pages visited on the LCL Spas websites, unique URLs¹ visited within our website, browser type and IP address. Most non-personal data is collected via cookies or other analysis technologies.

3. Children's Privacy

LCL Spas is committed to protecting the privacy needs of children and we encourage parents and guardians to take an active role in their children's online activities and interests. LCL Spas does not knowingly collect information from children under the age of 13 and LCL Spas does not target its websites to children under 13.

4. How we use your information

LCL Spas uses your personal information to provide you with services and to help us better understand your needs and interests. Specifically, we use your information to help you complete a transaction or order, to communicate with you, to provide service and support, to update you on services and benefits, to personalize promotional offers and to personalize some LCL Spas websites. Occasionally we may also use your information to contact you for market research regarding LCL Spas products or services. We will give you the opportunity to choose your privacy preferences regarding such communications. You may, at any point, contact us to request an opt-on on future communication. Credit card information is used only for payment processing and fraud prevention. This information is not used for any other purpose by

our financial services providers or LCL Spas and will not be kept longer than necessary for providing the services, unless you ask us to retain your credit card information for future purchases.

Personal data collected online may also be combined with information you provide LCL Spas through other sources such as product registration, call centers or public events such as trade shows or seminars.

Personal data given to LCL Spas may be transferred across state, provincial and/or country borders for the purposes of data consolidation, storage and simplified customer information management.

Non-personal data is aggregated for reporting about LCL Spas website usability, performance and effectiveness. It is used to improve the customer experience, usability and site content.

5. Who we share your information with

LCL Spas will not sell, rent or lease your personal information to others. LCL Spas will not share your personal information with third parties except in responding to your requests for products or services. Your permission will be requested when you submit your information. LCL Spas shares customer information across LCL Spas -owned business entities and companies working on our behalf, but only as required to meet your product or service requirements.

LCL Spas occasionally may contract with third-party service providers and suppliers to deliver complete products, services and customer solutions. Suppliers and service providers are required to keep confidential the information received on behalf of LCL Spas and may not use it for any purpose other than to carry out the services they are performing for LCL Spas. These service providers may change or we may contract with additional service providers to better accommodate our customers. LCL Spas will not share personal information with any other third parties without your permission, unless required by law enforcement action, subpoena, or local law.

LCL Spas or its related entities could merge with or be acquired by another business entity or some or all of their respective assets could be acquired. If such a combination or acquisition occurs, LCL Spas will make every reasonable effort to notify you in the event we share with the merging or acquiring entity some or all of your personal information to continue serving you.

6. Your Choices

LCL Spas gives you the choice of receiving a variety of information that complements our products and services. You can subscribe to receive certain product- and service-specific information and LCL Spas-wide marketing communications. LCL Spas -wide communications may include new product information, special offers, or an invitation to participate in market research. We give you a choice regarding delivery of LCL Spas -wide communications by postal mail, e-mail and telephone. You can make or change your choices at the data collection point. We will make every effort to honour your preferences. This option does not apply to communications for the purpose of administering order completion, contracts, support, product safety warnings or driver updates.

7. Your information and third-party companies

Certain LCL Spas services are linked with those from unrelated third-party companies, some which offer you the option to share with both LCL Spas and the third party personal data you provide. We will not share your personal information with those third-party companies unless you make that choice.

8. Access to and accuracy of your information

LCL Spas strives to keep your personal information accurate. We have implemented technology, management processes and policies to maintain customer data accuracy. We will provide you with access to your information, to protect your privacy and security, we will also take reasonable steps to verify your identity, such as a password and user ID, before granting access to your data. Certain areas of LCL Spas websites may limit access to specific individuals through the use of passwords and other personal identifiers.

9. Keeping your information secure

LCL Spas is committed to protecting the information you provide us. To prevent unauthorized access or disclosure, to maintain data accuracy, and to ensure the appropriate use of the information, LCL Spas has in place appropriate physical and managerial procedures to safeguard the information we collect.

We use Secure Sockets Layer (SSL) encryption when collecting or transferring sensitive data such as credit card information. SSL encryption is designed to make the information unreadable by anyone but us. This security measure is working when you see either the symbol of an unbroken key or closed lock (depending on your browser) on the bottom of your browser window.

Credit card numbers are used only for processing payment and are not used for other purposes. As part of real-time payment processing, LCL Spas subscribes to a fraud management service. This service gives you and LCL Spas an extra level of security to guard against credit card fraud to protect your financial data.

10. Contacting us

We value your opinions. If you have comments or questions about our privacy policy, please send them to LCL Spas c/o jay.lclspas@mymts.net

This privacy statement applies to Canada