

PRIVACY POLICY

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Pangeya Group (“We” or “Us”) is committed to taking reasonable steps to protect the privacy of information in its care. This Privacy Policy applies to data provided to Pangeya Group by its business Customers and other individuals who provide us with information. Customer data received by Pangeya Group includes information about individual purchases made from Customers’ online stores.

OVERVIEW AND DEFINITIONS

Pangeya Group’s analysis of data helps Customers optimize their business performance across their ecommerce channels. Pangeya Group offers a variety of data points, analytics and actionable insights, providing Customers with a better understanding of their performance, competition, risks and potential in growing their business. Pangeya Group also provides and inventory solutions. For pricing, Pangeya Group continuously monitors the competitive landscape around Customers’ products, and provides information on optimal pricing and aggressiveness based on numerous considerations given the product, competitors and business goals. For inventory, Pangeya Group provides insights and recommendations related to replenishment of the Customer’s inventory.

For purposes of this Privacy Policy, certain terms have the following meanings: “Customer” means a business customer of Pangeya Group. “End-Client” means a purchaser of a Customer’s product sold on an ecommerce channel. An “End-Client” may be a consumer or a business. “Personal Information” means information that identifies an individual. “Protected Health Information,” or (“PHI”), is individually identifiable health information which is created or received by a covered entity (for example, a health care provider or dentist) and which relates to past, present or future physical or mental health or condition of an individual, the provision of health care to an individual, or the past, present or future payment of the provision of health care to an individual. Protected Health Information is further defined by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and is subject to the protections of HIPAA. “Sensitive Personal Information” means any information about a person that may relate to health or medical conditions, social security/social insurance numbers or national identifiers, credit card, bank account or other financial information, other information concerning trade union membership, sex life, political opinions, criminal charges or convictions, religious or philosophical beliefs, racial or ethnic origin, or other sensitive matters. “Website” means www.mohawkgp.com

COLLECTION AND USE OF PERSONAL INFORMATION

INFORMATION PROVIDED TO US

We may collect and store Personal Information and/or Sensitive Information that is voluntarily provided to us by a Customer or other individual. When information is provided to us by a Customer, the Customer affirms that it has the right to provide the information to us. Information we collect and store may include Customer name, email address, phone number, and other information about the Customer's business. Additionally, Customers typically provide End-Client information including name, email address, and shipping address, as well as the quantity and price of specific goods that the End-Client purchased from the Customer's ecommerce store(s). We use this information to help Customers optimize their business performance, and for other business purposes. We encrypt and/or hash all Customer and End-Client passwords.

CORRESPONDENCE

If a Customer or other individual contacts us via telephone, e-mail, fax, the postal service, our web page, through social media, or in any other way, we may retain the correspondence and the information it contains. This information may be used to respond to the inquiry, notify the Customer or other individual of Pangeya Group-related opportunities, for marketing purposes, or for other business purposes. If an individual or Customer communicates with us but does not wish to receive notifications about Pangeya Group-related opportunities, or otherwise wants to restrict the use of information provided to us, we ask that the individual or Customer please send us an e-mail or write to us at the address listed below.

INFORMATION FROM OTHER SOURCES

We may combine information that a Customer or other individual provides to us with other information about an individual from other sources, such as vendors, service providers, business partners, health care providers, and other third parties, transactions, and communications. We also may combine that information with data that is publicly available and data from third parties. This information may be used to provide an individual or Customer with information that may be of interest to the individual or Customer. If an individual or Customer does not wish to receive these notifications, we ask that the individual or Customer please send us an e-mail or write to us at the address listed below.

We also may receive information about individuals or Customers from third party social platforms, such as Facebook, Instagram, Twitter, or other platforms. When our Website is accessed or used through such a third party social platform, such use allows the third party social platform to collect information about the access to our Website, and allows us to access or collect information made available by the third party website in accordance with its privacy policy. This information may be available from the individual or Customer's third party social platform profile or account, or from cookies or other tracking tools placed on the individual or Customer's device by the third party platform.

INFORMATION ABOUT OTHERS

We may collect Personal Information about other people that an individual or any Customer provides to us, such as name and email address.

INFORMATION AUTOMATICALLY COLLECTED DURING WEBSITE VISITS

We automatically collect information about everyone who visits our Website. This includes log data that automatically records information about each visit, such as browser type, operating system, the URL of the page that referred the person visiting our Website, the different actions performed, and the IP address used to access pages on the Website. We use this information to administer the Website, analyze trends, provide an experience that is relevant to the person visiting our Website based on location of the IP address used to access the Website, gather information about visitor movements, help diagnose potential problems with our server, investigate actual or potential security incidents, and ensure the Website is working properly. We also automatically collect information related to operating system name and version, device manufacturer and model, device identifier, language, the name and version of the software application that is used to access our Website. We use this information for purposes such as ensuring that our Website functions properly and to understand usage of our Website.

We may assign a device accessing our Website with one or more cookies to facilitate access to our Website, and to personalize the online experience. A cookie is a small text file that is stored on a user's computer or mobile device for record keeping purposes. Cookies can be either session cookies or persistent cookies. We may use both session cookies (which expire once an individual closes their browser) and persistent cookies (which stay on devices until the individual deletes them) to provide a more personal and interactive experience on our Website. These cookies may be delivered by us or by third parties.

We also work with other companies who use tracking technologies to serve ads on our behalf across the Internet. These companies may collect information about interactions with us to present individuals who access our Website with opportunities to purchase Pangeya Group products. Retargeting cookies also are used to present individuals who access our Website with Pangeya Group advertising on other websites based on their interaction on our Website and other websites.

Our Website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google uses cookies to help us analyze how visitors use the Website. The information generated by the cookie about an individual's use of the Website is generally transmitted to and stored on a Google server in the U.S. In case of activation of IP anonymization, Google will, however, truncate/anonymize the last eight-bit segment of an IP address beforehand within Member States of the European Union or other parties to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a Google server in the US and truncated there. On behalf of the operator of the Website, Google will use this information for the purpose of evaluating use of the Website, compiling reports on the Website activity, and providing the operator with other services relating to the Website and Internet use. Google will not associate an IP address with any other data held by Google.

An individual may manage and opt out of Google's use of cookies by visiting Google's Ads settings. However, please note that if this is done, the user may not be able to use the full functionality of the Website. Alternatively, an individual can opt out by visiting the Network Advertising Initiative opt-out page: <http://www.networkadvertising.org/choices/>. Please note

that if use of cookies is disabled, it may not be possible to use the full functionality of the Website.

For further information on terms of use and data protection/privacy, please see www.google.com/analytics/terms/ or www.google.com/analytics/learn/index.

Our Website uses Yandex.Metrica that uses to help us analyze how visitors use the Website. For further information on terms of use and data protection/privacy, please see metrica.yandex.com/about/info/privacy-policy. Yandex uses cookies to help us analyze how visitors use the Website.

DO NOT TRACK

Some browsers have a “Do Not Track” feature that lets an individual tell websites that the individual does not want to have their online activities tracked. These features are not yet uniform, and we currently are not able to respond to those signals.

SHARING INFORMATION WITH THIRD PARTIES

We do not reveal Personal Information, Protected Health Information or Sensitive Personal Information to third parties except in the following circumstances:

We may transfer information to our agents, third parties, or service providers to conduct our business. For example, third parties and service providers working with us may handle credit card processing, shipping, customer service, data management, e-mail distribution, market research, information analysis, promotions management, social media marketing, and similar services. We may use cloud service providers to host websites and store data, and these service providers inform us that they apply security measures they consider adequate for the protection of the information within their system.

We share information with Customers concerning their End-Clients. We may transfer your information in order to comply with the law, regulation, valid legal process (e.g., search warrant, subpoena or court order), or governmental or regulatory request; to address disputes or claims; to protect the security or integrity of Pangeya Group’s Website and services; to enforce an agreement; or to protect our rights, property or safety, or the rights, property or safety of our employees or others; We may transfer information to address emergencies or acts of God; We may transfer information in anticipation of and in the course of an actual or potential sale, reorganization, consolidation, merger, or amalgamation of all or part of our business or operations; When an individual whose data we hold requests or authorizes us to do so. Once we are directed to share data with a third party, that data is governed by the third party’s privacy policy; We may share Customer information with third parties to provide opportunities to Customers, such as webinars, that may be of interest to our Customers. We also may share or sell de-identified data with partners and the public in a variety of ways, such as by providing research or reports. To the extent that we provide de-identified data, we perform appropriate procedures so that the data does not identify any individual and does not permit re-identification of any individual. If we go through a business transaction, such as a

merger, acquisition by another company, or sale of all or a portion of our assets, we may share personal information which likely will be among the assets transferred.

SECURITY MEASURES

We are committed to taking reasonable efforts to secure the information that is provided to us, and we use a variety of security technologies and procedures to help protect against unauthorized access to or alteration, disclosure, or destruction of data. Even though we take reasonable steps to secure your information, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot fully guarantee the security of information that is provided to us. Questions about the security of information provided to us, including the security of our Website, should be directed to us by sending us an email or writing to us at the address listed below, indicating “Security Inquiry” in the subject line.

CALIFORNIA PRIVACY RIGHTS

California residents have the right to ask us one time each year if we have shared their personal information with third parties for direct marketing purposes. To make a request, please email us or write to us at the address listed below, and indicate “California Shine the Light Inquiry” in the subject line.

CHILDREN

Our services are not intended for use by or targeted at children under 13, and we do not knowingly or intentionally collect information about children under 13. We may provide links to third-party websites that allow children under the age of 13 to register for use of the website, or are targeted at children under 13. In such instances, the third-parties are responsible for ensuring that their websites comply with applicable laws, regulations, and rules.

VISITING OUR WEBSITE FROM OUTSIDE THE UNITED STATES

For Website visitors outside of the United States, please be aware that information about your visit may be transferred to, stored, and processed in the U.S., where our servers are located and our central database is operated. Please be aware that the data protection and other laws of the U.S. might not be as comprehensive as those in your country. By visiting our Website, you agree that your information may be transferred to our facilities and those third parties with whom we share it, as described in this Privacy Policy.

INAPPLICABILITY OF PRIVACY POLICIES OF ANY LINKED WEBSITES OR OTHER THIRD PARTIES

This Privacy Policy only addresses our use and disclosure of information. It does not address, and we are not responsible for, the privacy or security practices of any third parties, including

our third party service providers (including cloud service providers and any other third party operating any software application or website to which our Website contains a link. The inclusion of a link on the Website does not imply endorsement of the linked software application or website by us. We encourage visitors to carefully read the Privacy Policies of other websites you visit.

CHOICES AND ACCESS

Visitors to our Website have choices about how we use and disclose your Personal Information, Sensitive Personal Information, and PHI in connection with marketing efforts. For example, we will not use or share your PHI for marketing purposes unless you opt in. You may unsubscribe from our other marketing communications by sending us an e-mail at the address listed below. For California residents, please consult the “Your Privacy Rights” section above for additional considerations.

If you have previously opted in to the use and sharing of your information for marketing purposes, and wish to change your preferences, you may do so by sending an e-mail at the address listed below. Please note that if we receive your opt out request after having shared your information with a third party for direct marketing purposes or having otherwise transferred or disposed of your information, we may not have the ability to control the use of such information by any third party. If you opt out of receiving marketing-related messages from us, we still may send you service-related communications.

DATA RETENTION

We retain Personal Information, Sensitive Personal Information, and PHI as long as we consider it potentially useful for business purposes. We also keep information as otherwise required by law.

HOW YOU CAN ACCESS AND CHANGE YOUR INFORMATION

You can update or correct your information, or remove it from our system by making a request to us at the contact information provided below. If for some reason access is denied, we will provide an explanation of why access has been denied.

CONDITIONS OF USE

By using these Services, you agree to the terms and conditions contained in this Privacy Policy and/ any other agreement we might have with you. If you do not agree to any of these terms and conditions, you should not use our Services.

NO GUARANTEE

No data transmission over the Internet or electronic storage can be guaranteed to be 100% secure. Accordingly, and despite our efforts, Pangeya Group cannot guarantee or warrant the security of any information transmitted to us, or to or from our online products or services. For questions about this Privacy Policy, please send us an email or write to us at the address listed below.

CHANGES TO THE PRIVACY POLICY

As Pangeya Group, its products, and its services change from time to time, this Privacy Policy is expected to change as well. We reserve the right to amend the Privacy Policy at any time, for any reason, and may do so by posting a new version online.

CONTACT US

For any questions about this Privacy Policy or our treatment of the information, please contact us at: info@pangeyagroup.com