

PRIVACY POLICY

Snap-on Tools Company LLC in the United States and Snap-on Tools of Canada Co. in Canada are part of the Snap-on Incorporated group of companies ("Snap-on Group"), which processes your information. Snap-on Tools Company LLC and Snap-on Tools of Canada Co., respectively, are referred to as "we" in this privacy policy.

The protection of your personal information is an important concern to which we pay special attention.

This privacy policy answers frequently asked questions about the kinds of personal information we collect from you and how it is used.

Please note, the privacy practices set forth in this privacy policy are for Snap-on Tools Company LLC in the United States and Snap-on Tools of Canada Co. in Canada only. Other companies within the Snap-on Group may have websites and products that collect and use different personal information. If you are visiting this site as an employee of the Snap-on Group, the employee privacy policy you received applies. Additionally, if you link to or otherwise visit any other websites, please review the privacy policies posted on those sites.

Should you have any questions or concerns regarding this privacy policy, please contact the data protection manager at: DataProtectionManager@snapon.com.

1. What types of personal information do we gather?

We may collect and process a range of personal information including:

- **Identifiers:** Such as a real name, alias, postal address, telephone number, online identifier, internet protocol address, email address, account name, social security number, driver's license number, passport number, other state or national identification number(s), your signature, physical characteristics or description, insurance policy number or other similar unique personal identifiers.
- **Commercial Information:** Such as transaction and purchase information and history.
- **Financial Information:** Such as your bank account number, credit card number, debit card number or any other financial information.
- **Technical and Usage Information:** Such as login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and information on other technology on the devices using our websites or products; information about how you use our website, products and services, such as browsing history, search history, or other information on interactions with our websites, applications, products and services. For detailed information on the tracking technologies we use on this website, see [\[Link to Cookie Section\]](#).
- **Educational or Professional/Employment-Related Information:** Such as education or training history, work history and prior employers.

- **Sensory information:** Such as audio, electronic, visual and similar information, such as call and video recordings.
- **Inference Information:** For example preference profiles drawn from any of the personal information listed above.
- **Protected Class Information or other Sensitive Information:** including classifications protected by law such as: sex, age, race, national origin, disability, medical conditions, marital status, citizenship, military/veteran status, request for leave, and criminal offence data.
- **We do not intend to collect personal information of Children:** We do not knowingly collect personal information from children under 16. Our website is not intended for children under 16 years of age. If you are under 16, do not use or provide any information on this website or through any of its features. If you believe we might have any information from or about a child under 16, please contact us at DataProtectionManager@snapon.com.

2. What are the sources of personal information we have gathered?

We collect personal information from a variety of sources, including:

- **From You.** You may directly give us personal information when you:
 - Apply for and/or purchase a franchise business;
 - Apply for, purchase, register or use our products and services;
 - Receive customer support;
 - Create an account on our website;
 - Subscribe to our publications;
 - Request marketing be sent to you;
 - Enter a competition, promotion or survey;
 - Correspond with us in person at trade shows, events, or otherwise;
 - Interact with us as a potential or existing franchisee or as an employee or contractor of a franchisee;
 - Make a claim under a franchisee insurance policy for which we provide claims administration services;
 - Register for an event;
 - Give us feedback or provide us other information when you contact us; or
 - When you connect your social media account to your account with us.
 - Do not provide personal information about others to us unless you have confirmed you are authorized to do so.

- **From automated technologies or interactions.** As you interact with our website or application, we will automatically collect Technical and Usage Information (more fully described in the “What types of personal information do we gather?” Section.) We collect this data by using cookies, server logs and other similar technologies. For detailed information on the technologies we use on this website, see [[Link to Cookie Section](#)].
- **From third parties or publicly available sources.** We will receive personal information from various third parties that confirmed they are authorized to share it with us or other public sources, such as:
 - Consumer reporting agencies, credit reference agencies and publicly available databases;
 - Auto repair shops and auto dealers who use our products or services;
 - Our franchisees;
 - Your financial and legal advisors;
 - Our vendors and suppliers that you may interact with;
 - Insurance companies and brokers;
 - Other Snap-on Group companies or employees that you may interact with, including through other websites, products, services, or social media pages; or
 - Search information providers.

3. **How is that personal information used by us?**

We may use your personal information in the following ways:

- **Business Uses, such as:**
 - Process and deliver your order, manage your subscriptions, or carry out our obligations arising from any other contracts you enter into with us;
 - Manage warranty and tool returns;
 - Provide bookkeeping and tax services;
 - Support financing and lender enquiries;
 - Support corporate ownership and confirmation;
 - Manage payments, fees and charges and collect and recover money owed to us and/or pay money we owe you;
 - Managing our relationship with you by sending you renewal notices, notifying you of product or service information, asking you to leave a review or take a survey, or enabling you to partake in a prize draw or competition;
 - Managing franchise information, such as processing employee and assistant changes, route changes and relocations, amending list of calls, processing

manager Owner/Reversal of Managing Owner and corporation assignments, organising training, and managing credit limits;

- Franchise performance reporting;
 - Fulfil your requests, answer your questions, respond to your comments, and measure how effectively we address your concerns;
 - Analyse and develop new products and services, or make suggestions and recommendations to you about goods and services that may be of interest to you;
 - Providing franchise support;
 - Arrange events and make travel arrangements;
 - Process franchisee exit from the franchise system; or
 - Fulfil any legal obligations we may have.
- **Monitoring & Recording:** to handle any calls, chats or other interactions with us, including by the customer services team. Please be aware that it is our general practice to monitor and in some cases record such interactions for staff training or quality assurance purposes or to retain evidence of a particular transaction or interaction.
 - **Mobile Applications:** to make available mobile applications, such as to implement social media platforms on some of our websites, to register on these platforms. Please refer also to any supplemental privacy policy that may be available with respect to these third party social media platforms.
 - **Website Experience:** for the technical administration of the website; for internal operations; for customer administration; for product surveys; for troubleshooting; for information analysis, information analytics, testing, and research and development purposes; to ensure that content from our site is presented in the most effective manner for you and for your computer; and as part of our efforts to keep our site safe and secure.
 - **Protecting our Rights and Property:** to protect our rights or property or that of our business partners, franchisees, dealers, suppliers, customers or others when we have reasonable grounds to believe that such rights or property have been or could be affected; to recover debts; to prevent, detect, identify, investigate, respond, and protect against potential or actual claims, liabilities and prohibited behavior or activities.
 - **Information for our Service Providers, Franchisees, and Dealers:** to administer and develop our business relationship with you, the dealer or franchisee you represent, including sharing information with our group or relevant service providers, to enter into or perform a transaction with you, to contact you as part of satisfaction surveys or for franchise research purposes. To the extent you choose to consider or otherwise avail yourself of the programs facilitated through or offered by the Snap-on Group, including Snap-on Credit LLC or Snap-on SecureCorp Inc., your information will be provided to them specifically and their privacy policy will apply to their use of your information.

- **Product development:** We may use non-identifying and aggregate information to gather information for product management and development. For example, we may tell our sales and marketing staff that X number of individuals visited a certain area on our web site, or that Y number of software licenses were ordered during a particular time period. This aggregate information may also be shared with the Snap-on Group, independent dealers and franchisees.
- **Marketing:** to communicate about, and administer participation in, special events, programs, surveys, contests, sweepstakes, and other offers and promotions; to provide you with information about other goods and services we offer, or offered by others, that are similar to those that you have already purchased or enquired about and to send informational or promotional email messages to you, which you may opt out of receiving as described below.

4. **Is my personal information transferred or provided to third parties?**

The following categories of information (more fully described in the “What types of personal information do we gather” Section) may be disclosed: Identifiers, Commercial Information, Financial Information, Technical or Usage Information, Educational or Professional/Employment-Related Information, Protected Class Information or Other Sensitive Information. Such information may be disclosed as follows:

- **Other companies within the Snap-on Group:** We are a global organization with affiliates, subsidiaries, business processes, management structures and technical systems that cross borders. As such, we will share the personal information we collect with companies within the Snap-on Group and transfer it to countries in the world where we do business in connection with the uses identified above and in accordance with this privacy policy.
- **Service Providers and Third Parties:** Subject to their compliance with applicable legislation and/or this privacy policy, we will also disclose your personal information to selected non-affiliated third parties, including service providers that perform transaction processing or servicing functions, service providers that you may interact with in the normal course of operating your business, credit reference agencies, debt collection agencies, and/or other companies that provide services on our behalf, professional service providers (including translators, legal advisers and accountants), adverse parties who have a legal right to receive such information and their counsel and experts, law enforcement authorities, other franchisees and franchise prospects, and other government authorities. We will only disclose such information for a legitimate business purposes, such as using a service provider to assist in the uses outlined in the “How is that personal information used by us” Section or as otherwise required by law.
- **Business reorganizations:** Circumstances may arise where, whether for strategic or other business reasons, we decide to sell, buy, merge or otherwise reorganise our business. Such a transaction may involve the disclosure of personal information to prospective or actual purchasers, or the receipt of such information from sellers. It is our practice to seek appropriate protection for information in these types of transactions.

- **Customers:** We may provide your contact information to customers on your list of calls or potential customers so they may contact you. Contact information may also be disclosed to other prospective buyers of a franchise while the franchisee is active or when they leave the system.

5. How long will my personal information be kept for?

We will endeavour not to keep your personal information in a form that allows you to be identified for any longer than is reasonably necessary for achieving the permitted purposes. This means that information will be destroyed or erased from our systems or anonymized when it has reached the applicable retention period.

6. Will my personal information be transferred to other countries?

We are a global company and we may process, store and transfer personal information we collect to a country outside your own (including the United States and Canada), provided that certain conditions as set out in the applicable legislation are complied with.

7. What security measures are in place to protect my personal information?

We endeavour to protect the security of your personal information. We will seek to maintain administrative, technical and physical safeguards to protect against loss, misuse or unauthorized access, disclosure, alteration or destruction of your personal information.

Unfortunately, the transmission of information via the internet is not completely secure. Although we endeavour to protect your personal information, we cannot guarantee the security of your personal information transmitted to us or stored on our systems; any transmission is at your own risk. Once we have received your personal information, we will use procedures and security features to try to prevent unauthorized access. These procedures include physical, electronic, and managerial procedures.

8. How do I update or access my personal information?

We ask that you keep your information as up-to-date as possible so you may get the maximum benefit from us.

For questions related to updating or changing your personal information, please contact the customer care team on 877.762.7662 (United States) or 866.824.0524 (Canada).

9. What specific rights do I have in relation to my personal information based on my residency?

- **California Residents:** The California Consumer Privacy Act (“CCPA”) provides California residents specific rights regarding their personal information. You have the right to be free from unlawful discrimination for exercising your rights under the CCPA. This section describes your CCPA rights and explains how to exercise those rights.

- **Access to Specific Information and Data Portability:** You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Please note, we do not provide these access and data portability rights for B2B personal information. Once we receive and confirm your verifiable consumer request, We will disclose to you:
 - The categories of personal information we collected about you.
 - The categories of sources for the personal information we collected about you.
 - Our business or commercial purpose for collecting that personal information.
 - The categories of third parties with whom we share that personal information.
 - The specific pieces of personal information we collected about you (also called a data portability request).
 - If we disclosed your personal information for a business purpose, we will identify the personal information categories that each category of recipient obtained.
- **Deletion Request Rights:** You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies. We do not provide these deletion rights for B2B personal information. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:
 - Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
 - Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
 - Debug products to identify and repair errors that impair existing intended functionality.

- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
 - Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
 - Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
 - Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
 - Comply with a legal obligation.
 - Make other internal and lawful uses of that information that are compatible with the context in which you provided it.
- **Exercising Access, Data Portability, and Deletion Rights.** To exercise the rights described above, please submit a verifiable consumer request to us by either:
 - Calling us toll-free at 844-972-1285; or
 - Contacting us [here](#).
 - **Other notices for California residents:**
 - California "Do Not Track" Disclosure. We do not track our customers over time and across third party websites to provide targeted advertising and therefore generally do not respond to Do Not Track (DNT) signals.
 - **WE HAVE NOT "SOLD" PERSONAL INFORMATION FOR PURPOSES OF THE CALIFORNIA CONSUMER PRIVACY ACT.**
 - If you are a resident of California, under 18, and a registered user of our websites, you may ask us to remove content or information that you have posted by writing to our Data Protection Manager at DataProtectionManager@snapon.com. Please note that your request does not ensure complete or comprehensive removal of the content or information, as, for example, some of your content may have been reposted by another user.
 - **Nevada Residents:** Nevada residents may request that website operators not sell consumer's "Covered Information" as defined by Nevada law. **WE HAVE NOT "SOLD" COVERED INFORMATION FOR PURPOSES OF NEVADA LAW.** If you are a Nevada resident that would like to make a further inquiry regarding the selling your Covered Information, please contact DataProtectionManager@snapon.com.

10. How do we use cookies?

- **What are cookies:** Cookies are small text files that are placed on your computer by websites that you visit, and are widely used to make websites work, or work more efficiently.
- **How do I change my cookie settings:**
 - Most browsers automatically accept cookies. However, you can prevent cookies from being stored on your computer or device by setting your browser to not accept cookies. The exact instructions for this can be found in the manual for your browser. You can delete cookies already on your computer or device at any time. If you choose to set your browser settings so cookies are not accepted, then you can still visit our website, apps and online services, however doing so may affect your use of some parts of our web services, apps and online services and reduce availability of the services provided by our website, apps and online services.
 - [You can change your cookie preferences for this website at any time at [INSERT LINK].]
 - To opt out of being tracked by Google Analytics across all websites, visit <http://tools.google.com/dlpage/gaoptout>.
- **How does this website use cookies:** The table below explains the cookies we use and why.

Except for essential cookies, all cookies will expire as indicated in the above list.

11. What should I do if I think there has been a breach of the applicable data protection legislation or this Privacy Policy?

If you consider that the applicable data protection legislation or this policy has not been followed, then you should raise the matter with our Data Protection Manager at DataProtectionManager@snapon.com.

12. Modifications to this Privacy Statement

We reserve the right to modify this Privacy Policy at any time and without prior notice, subject to applicable legal requirements to notify you or obtain your consent. We will post any changes on our website so please check regularly for the most recent version of our Privacy Policy. This version is dated, 8th day of April, 2020.

13. Links

This site contains links to other sites. Please be aware that We are not responsible for the content or privacy practices of those sites, and our Privacy Policy does not apply to information collected from you by those sites. We encourage you to read the privacy statements of each site that collects information from you. When you are leaving our site via a link to interact with a site that is not governed by our Privacy Policy, a new browser window will open. If your interaction with our site will require sending your information to a third-party site that is not governed by our privacy policy, We will clearly inform you before your information is sent.