

**Privacy Policy**

Effective Date: 3/11/2021

This Privacy Policy applies to information that McRae Footwear, a division of McRae Industries, Inc., with offices at Hwy 109 North, Mount Gilead, NC 27306 (“**McRae**,” “**we**,” “**us**” or “**our**”) collects on www.mcraefootwear.com or any related website or service in or to which this Privacy Policy is linked or referenced (collectively, the “**Services**”).

YOUR PRIVACY IS IMPORTANT TO US. PLEASE READ THIS PRIVACY POLICY TO LEARN ABOUT THE INFORMATION THAT MCRAE COLLECTS FROM YOU AND HOW MCRAE USES THAT INFORMATION. BY USING THE SERVICES YOU CONSENT TO THE COLLECTION, USE AND TRANSFER OF YOUR PERSONAL INFORMATION AS DESCRIBED IN THIS PRIVACY POLICY. IF YOU DO NOT AGREE WITH ANY PART OF THIS PRIVACY POLICY, THEN PLEASE DO NOT USE THE SERVICES.

PLEASE BE AWARE THAT MCRAE AND ALL ASSOCIATED SERVICES AND SYSTEMS ARE HOUSED ON SERVERS IN THE UNITED STATES. IF YOU ARE LOCATED OUTSIDE OF THE UNITED STATES, INFORMATION WE COLLECT (INCLUDING COOKIES) ARE PROCESSED AND STORED IN THE UNITED STATES, WHICH MAY NOT OFFER THE SAME LEVEL OF PRIVACY PROTECTION AS THE COUNTRY WHERE YOU RESIDE OR ARE A CITIZEN. BY USING THE SERVICES AND PROVIDING INFORMATION TO US, YOU CONSENT TO THE TRANSFER TO AND PROCESSING OF THE INFORMATION IN THE UNITED STATES.

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## **1. SCOPE**

This Privacy Policy describes the information that McRae collects (directly or indirectly) and why we collect it, what we do with the information we collect and how you can manage your Personal Information (defined below). This Privacy Policy does not apply to any website or service that does not display or link to this Privacy Policy. Capitalized terms used but not defined in this Privacy Policy have the definitions provided in our Terms & Conditions. If you have not done so already, please review our Terms & Conditions before using the Services.

This Privacy Policy complies with the California Consumer Privacy Act of 2018 (as amended, the “CCPA”) and any terms defined in the CCPA have the same meaning when used in this Privacy Policy.

## **2. INFORMATION WE COLLECT**

We collect data to provide the products and services you request, ease your navigation of the Services, communicate with you, and improve your experience using the Services. Some of this information is provided by you directly to us, such as when you create an account or place an order. Some of the information is collected through your interactions with the Services. We collect such data using technologies like cookies, action tags, and other tracking technologies, error reports, and usage data collected when you interact with our Services. Some of the information is collected from your use of, and interactions with, us and others on social media, including but not limited to Facebook®, Twitter®, and Instagram® (collectively “**Social Media**”).

The data we collect depends on the products, services, and features of the Services that you use, and includes the following:

- When you register for the Services: When you register for the Services, we collect your name, email address, and password.
- When you use the Services: We may ask for contact information such as your name, address, telephone number, email address, contact preferences, employer/company, and other information related to your interests.
- We collect this information so that we may keep you informed about McRae and provide you with information.
- When you order products through the Services: We may ask for your name, address, phone number, email address, contact preferences, company and country.
- When you make a payment through the Services: If you make a payment to McRae, we will ask for Payment Information and other information requested for processing your payment.

### **2.1. Personal Information**

When you visit the Services without creating an account, you can browse without submitting Personal Information about yourself. In general, we collect Personal Information that you submit to us in the

process of creating or editing your account and user profile on the Services or that you submit to us voluntarily through your use of the Services. Information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household is “**Personal Information.**” Payment information is information required for payment processing, such as credit or payment card number, expiration date, cvv number, billing address, company name, and other information required for payment processing (“**Payment Information**”). Other information is information that, by itself does not individually identify you, such as browser type, operating system, the webpages you viewed and how long you viewed them (“**Other Information**”). We may link together different types of Other Information or link Other Information to Personal Information. If linked information directly or indirectly identifies an individual person, McRae treats the linked information as Personal Information. In this Privacy Policy, to “**process**” Personal Information means to perform any operation on Personal Information, whether or not by automated means, such as collection, recording, organizing, storing, adapting, use, disclosure, combining, erasing or destroying.

In particular, we have collected the following categories of Personal Information from users in the last twelve (12) months. We obtain these categories of Personal Information with the methods described in more detail below.

Category	Examples	Have We Collected Any Information in This Category?
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.	YES
B. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.  Some Personal Information included in this category may overlap with other categories.	YES

Category	Examples	Have We Collected Any Information in This Category?
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	NO
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO

Category	Examples	Have We Collected Any Information in This Category?
K. Inferences drawn from other Personal Information.	Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

Personal Information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.

Additionally, the following types of Personal Information are excluded from the CCPA’s scope:

- Certain health or medical information otherwise covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; and
- Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

We may also collect Personal Information from third parties, such as Social Media, Payment Processors, product vendors, and other partners. Our collection of this information allows us to provide you with our products and services, establish, maintain and support your user account on the Services, and communicate with you in accordance with our Terms & Conditions.

## 2.2. Automatically Collected Usage and Device Information

Similar to other websites, we use tracking technologies to automatically collect certain technical information from your web browser, mobile, or other device when you visit our Services. This data may include, without limitation, your IP address, browser type and language, referring/exit pages and URLs, other browser history, platform type, number of clicks, landing pages, the pages you requested and viewed, the amount of time spent on particular pages, and the date and time of your visits. Our collection of this data, described in more detail below, allows us to provide more personalized Services to you and to track usage of the Services.

Through Server Logs: A server log is a list of the activities that a server performs. McRae’s servers automatically collect and store in server logs your search queries, Internet Protocol (IP) address, hardware settings, browser type, browser language, the date and time of your request and referral URL and certain cookies that identify your browser or McRae account.

From Your Computer, Tablet or Mobile Telephone: We collect information about your computer, tablet or mobile telephone (“**Device**”), such as model, operating system version, mobile network information, telephone number, internet service provider and similar identifiers. McRae may associate your Device information with your McRae account. We may collect and store information (including Personal Information) on your Device through browser web and web application data caches.

Through Data Collection Technology: We use cookies, pixel tags (also known as web beacons, flash cookies and clear Graphics Interchange Format (GIF) images) and similar technology (“**Data Collection Technology**”) to automatically collect information (including Other Information) about you when you use the Services. Please read below to learn more about how McRae uses Data Collection Technology. McRae generally does not treat Other Information as Personal Information unless required by applicable law.

### **2.2.1. Cookies**

“**Cookies**” are small text files that are sent to or accessed from your web browser or your computer’s hard drive. A cookie typically contains the name of the domain (internet location) from which the cookie originated, the “lifetime” of the cookie (i.e., when it expires) and a randomly generated unique number or similar identifier. A cookie also may contain information about your computer, such as user settings, browsing history and activities conducted while using the Services. Our collection of this information allows us to improve your user experience in various ways, such as to personalize our display of the Services to you, to “remember” whether or not you are signed in, and to provide better technical support to you.

The Services use the following Cookies:

- Strictly necessary Cookies, which are required for the operation of the Services. Without them, for example, you would not be able to register or log in for the Services that McRae offers.
- Analytical/performance Cookies, which allow McRae to recognize and count the number of visitors, learn how visitors navigate the Services and improve the Services.
- Functionality Cookies, which McRae uses to recognize you when you return to the Services.

To learn more about Cookies and Web Beacons, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

*Please note:* If you restrict, disable, or block any or all Cookies from your web browser or Device, the Services may not operate properly, and you may not have access to certain services or parts of the Services. We will not be liable for any interruption in, or inability to use, the Services or degraded functioning thereof, where such are caused by your settings and choices regarding Cookies.

### **2.2.2. Web Beacons (aka pixels/web bugs/java script)**

“**Web Beacons**” are tiny graphics (about the size of a period at the end of a sentence) with unique identifiers used to track certain online actions, movements and related information of users of the Services. Unlike Cookies, which are stored on a user’s computer hard drive, Web Beacons are embedded invisibly on web pages or in HTML-based emails. The data we receive through Web Beacons allows us to

effectively promote the Services to various populations of users, and to optimize external advertisements about the Services that appear on third-party websites. We may use Web Beacons to automatically record certain technical information about your interactions when you visit the Services or otherwise engage with us, to help deliver Cookies on our Services, or to count users who have visited the Services. We may also include Web Beacons in our promotional e-mail messages or newsletters to determine whether you open or act on them for statistical purposes. Web Beacons help McRae develop statistical information to provide better and more personalized content.

### **2.3. Information from Other Sources**

We may obtain both personal and non-Personal Information about you from business partners, contractors, suppliers, and other third parties and add it to your account information or other information we have collected. We, and the third parties we engage, may combine information we collect from you over time, and across the Services, with information obtained from other sources. This helps us improve the information's overall accuracy and completeness, and also helps us better tailor our interactions with you.

We use third-party payment processors to assist in securely processing your Payment Information ("**Payment Processors**"). The Payment Information that you provide through the Services is encrypted and transmitted directly to the Payment Processor. In some cases the Payment Processor will direct you to its website and you will provide your Payment Information directly on the Payment Processor website. If you provide Payment Information through the Services, we do not store your Payment Information before transmitting it to the Payment Processor. We do not control and are not responsible for the Payment Processor or its collection or use of your information. When you complete a sale through a Payment Processor website, we may collect information from the Payment Processor in order to fulfill your order.

Currently our Payment Processor is Authorize.net. You may find out more about how our Payment Processor uses your Payment Information by viewing its privacy policy at [www.authorize.net](http://www.authorize.net).

### **2.4. Location Information**

We collect precise geolocation data from you or your Device, as well as your address information, e.g., shipping and billing address, when you set up your account and order our products or services. We also collect and use information about your general location (e.g., your state of residence) and can infer your approximate location based on your IP address in order to track our general Services usage or to tailor any pertinent aspects of your user experience to the region where you are located.

### **2.5. Information about Others**

You may also provide us with a third party's Personal Information. For example, if you purchase a gift we will collect the recipient's Personal Information to fulfill the order. We collect and handle any such Personal Information about others consistent with this Privacy Policy. You represent and warrant that you have obtained any required consent, provided any required notice, and otherwise fully complied with all

applicable laws, including any data protection laws, with regard to any information that you provide to us about others.

## **2.6. Social Media**

If you interact with us or our other users regarding McRae and its products and services on any Social Media: (a) the Personal Information that you submit by and through such Social Media can be read, collected and/or used by us (depending on your Social Media privacy settings) as described in this Privacy Policy, and (b) where McRae responds to any interaction with you on Social Media, your account name/handle may be viewable by any and all members or users of our Social Media accounts. We are not responsible for the Personal Information that you choose to submit or link on any Social Media. Social Media operates independently from us, and we are not responsible for Social Media interfaces or privacy or security practices. We encourage you to review the privacy policies and settings of any Social Media with which you interact to help you understand their privacy practices. If you have questions about the security and privacy settings of any Social Media that you use, please refer to the applicable privacy notices or policies.

## **3. EXTERNAL LINKS**

The Services contain links to third-party websites and services, including links to Social Media. We are not responsible for any of the content or features or functionality of other linked websites or services. We are also not responsible for the privacy practices and the terms and conditions of use for any external websites or services. The linked websites and services may collect Personal Information from you that is not subject to our control. The data collection practices of linked third-party websites and services will be governed by that third party's privacy policy and terms of use.

## **4. HOW WE PROCESS PERSONAL INFORMATION**

### **4.1. General**

McRae processes Personal Information for one or more of the following business purposes (“**Business Purpose**”):

- To set up and maintain your registration with the Services;
- To fulfill purchases made through the Services;
- To process payments;
- To communicate with you;
- To deliver relevant content to you;
- To provide features through the Services;
- To prevent and investigate fraud and other misuses of the Services;
- To protect our rights and property;
- To operate, manage and improve the Services; and
- To ensure the technical functionality and security of the Services.

McRae processes Other Information for one or more of the following Business Purposes:

- To administer and improve the Services and your experience on the Services;



- To analyze trends and gather broad aggregate demographic information;
- To statistically monitor how many people are using the Services or opening our emails;
- To develop, improve and protect the Services;
- For audience research;
- To audit and analyze the Services; and
- To ensure the technical functionality and security of the Services.

#### **4.2. Account-Related Emails**

When you create an account with us and provide us with your email we may, subject to applicable law, use your email address to send you Services-related notices (including any notices required by law, in lieu of communication by postal mail), updates, news, and marketing messages. For example, when you register, you will receive a welcome email. If the Services are temporarily unavailable, we may also send you an email notice.

Email communications you receive from us will generally provide an unsubscribe link or instructions allowing you to opt out of receiving future emails or to change your contact preferences. If you have registered for an account with us, you can also change your contact preferences within your account settings. Please remember that even if you opt out of receiving marketing e-mails, we may still send you important service information related to your account and the Services. If you correspond with us by email, we may retain the content of your email messages, your email address, and our responses.

#### **4.3. Advertising**

We use third party service providers to serve advertisements or collect data on our behalf across the internet and on the Services (“**Advertisers**”). Some of these Advertisers may collect your Personal Information about your visits to our website and your interactions with our products and services to tailor marketing messages on other sites, or to trigger real-time interactions, customize the Services, or enhance your profile. Advertisers may use Cookies, Web Beacons, and other technologies to collect your Personal Information, measure the effectiveness of their advertisements, and personalize the advertisements on other sites. Some of these Advertisers may collect your Personal Information that you share on the Services via a web form automatically and prior to your submission of the Personal Information (i.e., before you click “Submit”). Advertisers may be able to use information from your Services visits to send marketing messages to you in a way that could personally identify you. The information collected by Advertisers may include your IP address, email addresses and other user and Device-level information. For example, when Advertisers send advertisements and links that appear on the Services directly to your browser, they automatically receive your IP address. Please keep in mind that your browser settings may not permit you to control Advertisers’ technologies, and this Privacy Policy does not apply to, and we cannot control the activities of Advertisers. If you would like more information about Advertisers’ practices, please see <http://optout.aboutads.info/#/>.

#### **4.4. Non-Personally Identifiable Information**

We may use non-personally identifiable information, such as anonymized and/or aggregated website usage data, in any manner that does not identify individual users for the purpose of improving the

operation and management of the Services, including to develop new features, functionality, and services, to conduct internal research, to better understand website usage patterns, to resolve disputes, to troubleshoot problems, to fulfill user requests, or for security and compliance purposes. Any non-personally identifiable information that is combined with Personal Information will be treated by us as Personal Information.

#### **4.5. Payment Processors**

If you purchase or pay for products or services via the Services, the transaction may be handled by the Payment Processors responsible for processing your payment. These entities have their own privacy policies and those terms will apply to you. Please be sure to review them at the links provided during payment processing.

### **5. HOW WE SHARE INFORMATION**

When we disclose Personal Information for a Business Purpose, we enter into a contract that describes the purpose and requires the recipient to keep that Personal Information confidential and use only for performance of the contract, and not for any other purpose. We share or make your information available, including any Personal Information, in the circumstances described below.

#### **5.1. Disclosures of Personal Information in the Last Twelve Months**

We may share Personal Information collected via the Services with:

Service Providers: McRae shares information with McRae's other third-party service providers that perform services on our behalf, such as payment processing, marketing, event registration, web hosting, or data storage. These third-party companies may use your contact information for communications and marketing purposes that support our Services. You are under no obligation to respond and the companies are restricted from using your contact information for any other purpose. McRae will ensure that any service provider with which we share Personal Information agrees to safeguard it in substantially the same manner as McRae has described in this Privacy Policy and in accordance with all applicable laws. McRae may aggregate information collected through the Services and remove identifiers so that the information no longer identifies or can be used to identify an individual ("**Anonymized Information**"). McRae shares Anonymized Information with third parties (our sponsors) and does not limit third parties' use of the Anonymized Information because it is no longer Personal Information.

In the preceding twelve (12) months, we have disclosed the following categories of Personal Information for a Business Purpose, as more fully described in [Section 4](#):

- Category A: Identifiers.
- Category B: California Customer Records personal information categories.
- Category D: Commercial information.
- Category F: Internet or other similar network activity.
- Category G: Geolocation data.

We disclose your Personal Information for a Business Purpose to the following categories of third parties:

- Payment Processors.
- Advertisers.
- Social Media.
- Other third party marketing service providers.
- Affiliated persons or third-party service providers assisting us in the operation, management, improvement, research and analysis of the Services.

*Please note:* Affiliated persons or our third party service providers may augment, extend, and combine non-personally identifiable information with data from additional third party sources in order to assist us in our operation of the Services.

## **5.2. Sales of Personal Information in the Last Twelve Months**

We do not sell Personal Information and have not sold Personal Information in the preceding twelve (12) months.

## **5.3. Organizational Transitions**

McRae may share Personal Information if McRae is involved in a merger, sale, acquisition, divestiture, restructuring, reorganization, dissolution, bankruptcy or other change of ownership or control (in whole or in part). McRae requires that the shared Personal Information remain subject to the promises made in the then-current Privacy Policy, unless and until you agree to a new privacy terms.

## **5.4. Legal Requirements**

Applicable law may require McRae to disclose your Personal Information if:

- (i) reasonably necessary to comply with legal process (such as a court order, subpoena or search warrant) or other legal requirements;
- (ii) disclosure would mitigate McRae’s liability in an actual or threatened lawsuit;
- (iii) necessary to protect legal rights of McRae, users, customers, business partners or other interested parties; or
- (iv) necessary for the prevention or detection of crime (subject in each case to applicable law).

## **5.5. California Shine the Light Law**

California Civil Code Section 1798.83 permits users who are California residents to obtain from us once a year, free of charge, a list of third parties to whom we have disclosed personal information (if any) for direct marketing purposes in the preceding calendar year. If you are a California resident and you wish to make such a request, please send an e-mail with “California Privacy Rights” in the subject line to [privacy@mcræfootwear.com](mailto:privacy@mcræfootwear.com) or write us at:

McRae Footwear

PO Box 1239  
Hwy 109 North  
Mount Gilead, NC 27306

## **5.6. Disclaimer**

We cannot ensure that all of your Personal Information will be disclosed only in the ways described in this Privacy Policy. For example, third parties may unlawfully intercept or access transmissions or private communications, or users may abuse or misuse your Personal Information that they collect from the Services. Even with the most rigorous information security standards, no transmission of data over the internet can be 100% secure.

## **6. YOUR CHOICES AND OPTIONS RELATING TO OUR COLLECTION**

### **6.1. You Can Choose Not to Provide Personal Information**

You may always decline to provide your Personal Information to us. Registering for an account or otherwise providing your Personal Information is not required to access some of our online content. If you choose not to provide certain Personal Information to us, some of your experiences may be affected (for example, we cannot accept an order without your name, certain contact information, and Payment Information).

### **6.2. You May Decline Other Requests**

We use the Personal Information of our users as needed for the purposes for which it was collected or where you have consented to our use of such information. If you do not wish to provide information to us or do not wish to consent to the uses described in this Privacy Policy, please do not use the Services, set up an account, or supply the requested information to us.

### **6.3. Right to Access Specific Information and Data Portability Right**

You may have the right under the CCPA to request that we disclose certain information to you about our collection and use of your Personal Information over the past twelve (12) months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of Personal Information that we have collected about you.
- The categories of sources for the Personal Information that we have collected about you.
- Our business or commercial purpose for collecting or making available that Personal Information.
- The categories of third parties with whom we share that Personal Information.
- The specific pieces of Personal Information that we have collected about you (also called a data portability request).
- If we disclosed your Personal Information for a Business Purpose, the Business Purpose for which such Personal Information was disclosed, and the Personal Information categories that each category of recipient obtained.
- If applicable, (1) the categories of your Personal Information that we have made available for valuable consideration; (2) the categories of third parties to whom such Personal Information was made available; and (3) the category or categories of Personal Information that we have made available to each category of third parties.

#### **6.4. Right to Delete**

You may have the right under the CCPA 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 may deny your deletion request if retaining the information is necessary for us or our service provider(s) or vendor(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, 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 or legal order.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

#### **6.5. Exercising Your Rights**

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

Visiting <https://mcraefootwear.com/contact>

Sending us an e-mail at [privacy@mcraefootwear.com](mailto:privacy@mcraefootwear.com)

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make such a request for access or data portability twice within a twelve-month period. The verifiable consumer request must provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative, and

describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to ninety (90) days), we will inform you of the reason and extension period in writing. We will deliver our written response electronically. Any disclosures we provide will only cover the twelve (12) month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

#### **6.6. Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

#### **6.7. Online Tracking Choices**

Some web browsers (including some mobile web browsers) provide settings that allow you to control or reject Cookies or to alert you when a Cookie is placed on your Device. Although you are not required to accept Cookies or mobile device identifiers, if you block or reject them, some features of the Services (particularly those that require sign-in) may not function properly.

Some web browsers (including Safari, Internet Explorer, Firefox and Chrome) incorporate a "Do Not Track" ("DNT") or similar feature that signals to websites that a user does not want to have his or her online activity and behavior tracked. If a website that responds to a particular DNT signal receives the DNT signal, the browser can block that website from collecting certain information about the browser's user. Not all

browsers offer a DNT option and DNT signals are not yet uniform. For this reason, many website operators, including McRae, do not respond to DNT signals.

## **7. CHILDREN'S PRIVACY**

The Services are not directed to or intended for use by minors. Consistent with the requirements of applicable law, if we learn that we have received any information directly from a minor without his or her parent's verified consent, we will use that information only to respond directly to that child (or his or her parent or legal guardian) to inform the minor that he or she cannot use the Services and subsequently will delete that information.

California Minors: While the Service is not intended for anyone under the age of 18, if you are a California resident who is under age 18 and you are unable to remove publicly-available content that you have submitted to us, you may request removal by contacting us at: [privacy@mcraftfootwear.com](mailto:privacy@mcraftfootwear.com).

When requesting removal, you must be specific about the information you want removed and provide us with specific information, such as the URL for each page where the information was entered, so that we can find it. We are not required to remove any content or information that: (1) federal or state law requires us or a third party to maintain; (2) was not posted by you; (3) is anonymized so that you cannot be identified; (4) you don't follow our instructions for removing or requesting removal; or (5) you received compensation or other consideration for providing the content or information. Removal of your content or information from the Service does not ensure complete or comprehensive removal of that content or information from our systems or the systems of our service providers. We are not required to delete the content or information posted by you; our obligations under California law are satisfied so long as we anonymize the content or information or render it invisible to other users and the public.

## **8. SECURITY OF PERSONAL INFORMATION**

McRae takes precautions intended to help protect information that we process but no system or electronic data transmission is completely secure. Any transmission of your Personal Information is at your own risk and we expect that you will use appropriate security measures to protect your Personal Information. You are responsible for maintaining the security of your account credentials for the Services. McRae will treat access to the Services through your account credentials as authorized by you. Unauthorized access to password-protected or secure areas is prohibited and may lead to criminal prosecution. We may suspend your use of all or part of the Services without notice if we suspect or detect any breach of security. If you believe that information you provided to us is no longer secure, please notify us immediately using the contact information provided below. If we become aware of a breach that affects the security of your Personal Information, we will provide you with notice as required by applicable law. To the extent permitted by applicable law, McRae will provide any such notice that McRae must provide to you at your account's email address. By using the Services, you agree to accept notice electronically.

We retain Personal Information in identifiable form only for as long as necessary to fulfill the purposes for which the Personal Information was provided to McRae or, if longer to comply with law legal obligations, to resolve disputes, to enforce agreements and similar essential purposes.

## **9. ACCESSING OR UPDATING YOUR PERSONAL INFORMATION**

You may request access to your Personal Information or correct and error or omission in your Personal Information by contacting us at [privacy@mcraefootwear.com](mailto:privacy@mcraefootwear.com) or write us at:

McRae Footwear  
PO Box 1239  
Hwy 109 North  
Mount Gilead, NC 27306

We will make good faith efforts to resolve requests to correct inaccurate information except where the request is unreasonable, requires disproportionate technical effort or expense, jeopardizes the privacy of others, or would be impractical.

## **10. CHANGES TO THE PRIVACY POLICY**

If we change this Privacy Policy, we will post the updated Privacy Policy and its effective date on this page. If McRae makes material changes that reduce your privacy rights, McRae will notify you in advance by sending you an email and/or by posting a notice in the Services. You should periodically review this Privacy Policy to ensure that you are familiar with the most current version. Your continued use of the Services after the Effective Date posted above will constitute your acceptance of the updated Privacy Policy.

## **11. HOW TO CONTACT US**

If you have any questions, comments, or concerns about how we handle your Personal Information, then you may contact us at [privacy@mcraefootwear.com](mailto:privacy@mcraefootwear.com) or write to us at:

McRae Footwear  
PO Box 1239  
Hwy 109 North  
Mount Gilead, NC 27306