

Privacy Policy

This policy describes how New Era Cap Company Limited and its affiliated entities, ("New Era," "we," "our") collects, uses, and shares personal information on www.neweracap.com, www.neweracap.co.uk and www.neweracap.eu. You can jump to particular topics by going to the headings below:

Types Of Information We Collect.

Use And Processing Of Information.

Sharing Of Information.

Your Choices.

How We Protect Personal Information

Miscellaneous

Contact Information

Types Of Information We Collect.

The following provides examples of the type of information that we collect from you and how we use the information.

Context	Types of Data	Primary Purpose for Collection and Use of Data
Account Registration	We collect your name and contact information when you create an account. We also collect information relating to the actions that you perform while logged into your account.	We have a legitimate interest in providing account relating functionalities to our users. Accounts can be used for easy checkout and to save your preferences and transaction history.
Cookies and first party tracking	We use cookies and clear GIFs. "Cookies" are small pieces of information that a website sends to a computer's hard drive while a web site is viewed. See our Cookie Policy for more information .	We have a legitimate interest in making our website operate efficiently.
Cookies and Third Party Tracking	We participate in behavior-based advertising, this means that a third party uses technology (e.g., a cookie) to collect information about your use of our website so that they can provide advertising about products and services tailored to your interests on our website, or on other websites. See our Cookie Policy for more information.	We have a legitimate interest in engaging in behavior-based advertising and capturing website analytics. You can opt-out of receiving advertising based upon your browsing behavior from some network advertising companies by going to the Network Advertising Initiative and the Digital Advertising Alliance websites, although to

		completely prevent advertising based upon your browsing behavior you should also disable the cookies on your browser.
Demographic Information	We collect personal information from you, such as your age or location.	We have a legitimate interest in understanding our users and providing tailored services.
Distance Information	When you use one of our Apps we collect your location from the GPS, Wi-Fi, and/or cellular technology in your device to determine your location and your distance from a store that sells our products.	We have a legitimate interest in understanding our users and providing tailored services. In some contexts our use is also based upon your consent to provide us with geo location information.
Email Interconnectivity	If you receive email from us, we use certain tools to capture data related to when you open our message, click on any links or banners it contains and make purchases.	We have a legitimate interest in understanding how you interact with our communications to you.
Employment	If you apply for a job posting, or become an employee, we collect information necessary to process your application or to retain you as an employee. This may include, among other things, your Social Security Number. Providing this information is required for employment.	We use information about current employees to perform our contract of employment, or the anticipation of a contract of employment with you. In some contexts, we are also required by law to collect information about our employees. We also have a legitimate interest in using your information to have efficient staffing and work force operations, and for evaluating job applicants.
Feedback/Support	If you provide us feedback or contact us for support we will collect your name and email address, as well as any other content that you send to us, in order to reply.	We have a legitimate interest in receiving, and acting upon, your feedback or issues.
Mailing List	When you sign up for one of our mailing lists we will collect your email address or postal address.	We have a legitimate interest in sharing information about our products or services.
Mobile Devices	We may collect information from your mobile device such as unique identifying information broadcast from your device when visiting our website or when visiting one of our stores.	We have a legitimate interest in identifying unique visitors, and in understanding how users interact with us on their mobile devices.
Order Placement	We collect your name, billing address, shipping address, email address, phone	We use your information to perform our contract to provide you with products or services.

	<p>number, and credit card number when you place an order.</p> <p>For Klarna payment options, we want to pass to Klarna certain of your personal information, as well as contact and order details, in order to make sure you pay for your payment options and tailor the payment options for you.</p> <p>General information on Klarna you can find here. Your personal data is handled in accordance with applicable data protection law and in accordance with the information contained in Klarna's Privacy Policy.</p>	
Partner Promotion	We collect information that you provide as part of a co-branded promotion with another company.	We have a legitimate interest in fulfilling our promotions.
Surveys	When you participate in a survey we may collect information that you provide through the survey. If the survey is provided by a third party service provider, the third party's privacy policy applies to the collection, use, and disclosure of your information.	We have a legitimate interest in understanding your opinions, and collecting information relevant to our organization.
Sweepstakes or contests	When you participate in a sweepstakes or contest we collect information about you which includes contact information to notify you if you are selected.	We have a legitimate interest in operating the sweepstakes. In some contexts we are also required by law to collect information about those that enter into our sweepstakes, and we have a legitimate interest in complying with those laws.
Website interactions	We use technology to monitor how you interact with our website. This may include which links you click on, or information that you type into our online forms. This may also include information about your device or browser.	We have a legitimate interest in understanding how you interact with our website to better improve it, and to understand your preferences and interests in order to select offerings that you might find most useful. We also have a legitimate interest in detecting and preventing fraud.
Web logs	We may collect information from you, including your browser type, operating system, Internet Protocol (IP) address (a number that is automatically assigned to a computer when the Internet is used), domain name, click-activity, referring website, and/or a date/time stamp for visitors.	We have a legitimate interest in monitoring our networks and the visitors to our websites. Among other things, it helps us understand which of our services is the most popular.

In addition to the information that we collect from you directly, we also receive information about you from other sources, including third parties, business partners, our affiliates, or publicly available sources. For example, if you submit a job application, or become an employee, we may conduct a background check.

The online application portion of our website is powered by a secure third party recruitment database. Resumes and/or job applications you submit for job openings will be used only for considering your application for the posted position (or other relevant positions) and not for marketing purposes.

Use And Processing Of Information.

In addition to the purposes and uses described above, we use your information in the following ways:

- To identify you when you visit our websites or our stores.
- To provide products and services or to process returns.
- To improve our services and product offerings.
- To streamline the checkout process.
- To conduct analytics.
- To respond to inquiries related to support, employment opportunities, or other requests.
- To send marketing and promotional materials, including information relating to our products, services, sales, or promotions.
- For internal administrative purposes, as well as to manage our relationships.

Although the sections above describe our primary purpose in collecting your information, in many situations we have more than one purpose. For example, if you complete an online purchase we may collect your information to perform our contract with you, but we also collect your information as we have a legitimate interest in maintaining your information after your transaction is complete so that we can quickly and easily respond to any questions about your order.

As a result our collecting and processing of your information is based in different contexts upon your consent, our need to perform a contract, our obligations under law, and/or our legitimate interest in conducting our business.

Sharing Of Information.

In addition to the specific situations discussed elsewhere in this policy, we disclose information in the following situations:

Affiliates and Acquisitions. We share your information with our corporate affiliates (*e.g.*, parent company, sister companies, subsidiaries, joint ventures, or other companies under common control). If another company acquires our company, business, or our assets, we will also share your information with that company.

Other Disclosures with Your Consent. We will ask if you would like us to share your information with other unaffiliated third parties who are not described elsewhere in this policy.

Other Disclosures without Your Consent. We will disclose information in response to subpoenas, warrants, or court orders, or in connection with any legal process, or to comply with relevant laws. We may also share your information in order to establish or exercise our rights, to defend against a legal claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies, or to comply with your request for the shipment of products to or the provision of services by a third party intermediary.

Public. Some of our websites provide the opportunity to post comments, or reviews, in a public forum. If you decide to submit information on these pages, that information will be publically available.

Partner Promotion. We may offer contests, sweepstakes, or other promotions with third party partners. If you decide to enter a contest, sweepstakes, or promotion that is sponsored by a third party partner the information that you provide will be shared with us and with them. Their use of your information is not governed by this privacy policy.

Service Providers. We share your information with service providers. Among other things service providers help us to administer our website, conduct surveys, provide technical support, process payments, and assist in the fulfillment of orders.

Your Choices.

You can make the following choices regarding your personal information:

1. **Promotional Emails.** You may choose to provide us with your email address for the purpose of allowing us to send free newsletters, surveys, offers, and other promotional materials to you, as well as targeted offers from third parties. You can stop receiving promotional emails by following the unsubscribe instructions in emails that you receive. If you decide not to receive promotional emails, we may still send you service related communications.
2. **Promotional Mailings.** If at any time you do not want to receive offers and/or circulars from us you can remove yourself from our mailing lists by emailing us (our contact information is below) with "NO SNAIL MAIL" in the subject line along with your name, address and zip code. Please note that our mailings are prepared in advance of their being sent. Although we will remove your name from our mailing list after receiving your request, you may still receive mailings from us that had been initiated prior to your name being removed.
3. **Changes To Your Personal Information.** We rely on you to update and correct your personal information. Most of our websites allow you to modify or delete your account profile. Note that we may keep historical information in our backup files as permitted by law. If our website does not permit you to update or correct certain information contact us at the address described below.
4. **Deletion Of Your Personal Information.** Typically we retain your personal information for the period necessary to fulfill the purposes outlined in this policy, unless a longer retention period is required or permitted by law. You may, however, request that we delete your personal information by contacting us at the address described below. When we delete personal information it will be removed from our active database, but it may remain in archives where it is not practical or possible to delete it. In addition, we may keep your personal

information as needed to comply with our legal obligations, resolve disputes, and/or enforce any of our agreements.

5. **Objection to Certain Processing.** You may object to our use of your personal information by contacting us at the address described below.
6. **Access To Your Personal Information.** If required by law, upon request, we will grant you with reasonable access to the personal information that have about you. You may request access to your personal information by contacting us at the address described below.
7. **Online Tracking.** We do not currently recognize automated browser signals regarding tracking mechanisms, which may include "Do Not Track" instructions.

How We Protect Personal Information

No method of transmission over the Internet, or method of electronic storage, is fully secure. While we use reasonable efforts to protect your personal information from unauthorized access, use, or disclosure, we cannot guarantee the security of your personal information. In the event that we are required by law to inform you of any unauthorized access to your personal information we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

Some of our websites permit you to create an account. When you do you will be prompted to create a password. You are responsible for maintaining the confidentiality of your password, and you are responsible for any access to or use of your account by someone else that has obtained your password, whether or not such access or use has been authorized by you. You should notify us of any unauthorized use of your password or account.

Miscellaneous

The following additional information relates to our privacy practices:

- **Transmission Of Information To Other Countries.** As a multi-national company we transmit information between and among our affiliates. As a result your information may be processed in a foreign country where privacy laws may be less stringent than the laws in your country. Nonetheless, where possible we take steps to treat personal information using the same privacy principles that apply pursuant to the law of the country in which we first received your information. If you would like more information concerning our attempts to apply the privacy principles applicable in one jurisdiction to data when it goes to another jurisdiction you can contact us using the contact information below.
- **Third Party Applications/Websites.** New Era may share its customer information (including personally identifiable information) with certain companies, including, but not limited to Braintree Payments (<http://www.braintreepayments.com>), PayPal (<http://www.paypal.com>), Windsor Circle (<http://www.windsorcircle.com>), XPO Logistics (<http://www.xpo.com>), UPS (<http://www.ups.com>), b2ceurope (<https://www.b2ceurope.eu>), DPD (<https://www.dpd.com>), DHL (<https://www.logistics.dhl>), Sagepay (www.sagepay.co.uk) and United States Postal Services (<http://www.usps.com>). New Era partners with Rakuten Marketing, who may track user activity when you interact with our site. The collection and use of this information is subject Rakuten's privacy policy (<https://rakutenmarketing.com/legal-notice/services-privacy-policy/>). We have no control over the privacy practices of websites or applications that we do not own.
- **Children's privacy.** New Era realizes that children may visit this website, and New Era encourages children to consult with their parents before submitting any information to any website, including ours. However, New Era believes that it is ultimately the parents' responsibility to supervise their children's online activities and consider using parental control tools available from online services and software

manufacturers that help provide a kid-friendly online environment. These tools can also prevent children from disclosing their names, addresses, and other personally identifiable information online without parental permission. New Era will not knowingly collect any personally identifiable information from children under the age of 13 without first obtaining parental consent. If a child under 13 submits personal information to New Era and we learn that the information is from a child under 13, we will attempt to delete the information as soon as possible.

- **Information Submittals.** Information submitted or provided to New Era through www.neweracap.com, www.neweracap.co.uk and/or www.neweracap.eu regarding New Era or its website or products, including but not limited to submission of ideas for new products, inventions and/or designs, including New Era By You designs (collectively, "Ideas"), shall be deemed to be non-confidential and New Era shall be free to copy, reproduce, use, disclose, distribute and commercially exploit such Ideas in any manner, without limitation or attribution. From time to time, we may contact you about special offers, updates on new products, invites to exclusive events and new website features if you agreed to be included in our mailing lists when you visited our website or completed a purchase with us or if you voluntarily participated in a New Era survey, contest, sweepstakes or other promotion. You may unsubscribe or change email preferences from our mailing lists by using the preference page option located at the bottom of your most recent email campaign received.
- **Changes To This Privacy Policy.** We may change our privacy policy and practices over time. To the extent that our policy changes in a material way, the policy that was in place at the time that you submitted personal information to us will generally govern that information.

Contact Information. If you have any questions, comments, or complaints concerning our privacy practices please contact us at the appropriate address below. We will attempt, where practical, to respond to your requests and to provide you with additional privacy-related information.

privacy.requests@neweracap.com
Attention: Customer Care and Legal Department, New Era Cap Company Limited
1st Floor East
CBX 2 Midsummer Boulevard
Milton Keynes
MK9 2EA
United Kingdom

If you are not satisfied with our response, and are in the European Union, you may have a right to lodge a complaint with your local supervisory authority.

Last Revised: 4.17.20

Privileged and Confidential