



ADHESIVES AND SEALANTS

"THE TECHNICAL SOLUTION IN DISTRIBUTION"

1491 West 124th Avenue
Denver, CO 80234
1.800.448.0406

Krayden, Inc.

EU/UK/Swiss-U.S. Data Privacy Framework: Consumer Privacy Policy

Last Updated: 6/24/2025

Krayden, Inc. ("Krayden") respects your concerns about privacy. Krayden and our subsidiaries Northern Composites and Bonding Source comply with the EU-U.S. Data Privacy Framework, the UK Extension to the EU-U.S. Data Privacy Framework, and the Swiss-U.S. Data Privacy Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union, the United Kingdom, and Switzerland to the United States. Krayden has certified to the Department of Commerce that it adheres to these Data Privacy Frameworks (DPFs). If there is any conflict between the terms in this privacy policy and a DPF, the DPF shall govern. To learn more about the DPFs, and to view our certification, please visit <https://www.dataprivacyframework.gov/s/>

This Policy describes how Krayden implements the DPFs for Consumer Personal Data and solely describes Krayden's activities in its role as a Controller (defined below).

This Policy includes Bonding Source and Northern Composites, subsidiaries of Krayden, Inc.

For purposes of this Policy:

"Consumer" means any natural person who is located in the EU, UK, or Switzerland, but excludes any individual acting in his or her capacity as an Employee.

"Controller" means a person or organization which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.

"Employee" means any current, former or prospective employee, intern, temporary worker or contractor of Krayden or any of its EU, UK, or Swiss subsidiaries or affiliates, or any related individual whose Personal Data Krayden processes in connection with an employment relationship, who is located in the EU, UK, or Switzerland. *Please review Krayden's handbooks and internally published policies for information about how we handle Employees' Personal Data.*

"EU" means the European Union and Iceland, Liechtenstein and Norway.

"Personal Data" means any information, including Sensitive Data, that is (i) about an identified or identifiable Individual, (ii) received by Krayden in the U.S. from the EU, UK, or Switzerland, and (iii) recorded in any form.

"Data Privacy Framework Principles" means the Principles and Supplemental Principles of the Data Privacy Framework.

"Processor" means any natural or legal person, public authority, agency or other body that processes Personal Data on behalf of a Controller.

"Sensitive Data" means Personal Data specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership (including trade union-related views or



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activities), sex life (including personal sexuality), information on social security measures, the commission or alleged commission of any offense, any proceedings for any offense committed or alleged to have been committed by the individual or the disposal of such proceedings, or the sentence of any court in such proceedings (including administrative proceedings and criminal sanctions).

"UK" means the United Kingdom.

Krayden's Data Privacy Framework certification, along with additional information about the Data Privacy Framework, can be found at <https://www.dataprivacyframework.gov/s/>. For more information about Krayden's processing of Consumer Personal Data with respect to information collected on its website, please visit Krayden's [Online Privacy Policy](#).

Types of Personal Data Krayden Collects

Krayden obtains Personal Data about Consumers in various ways. For example, Krayden collects Personal Data directly from Consumers when Consumers visit Krayden's website. The company may use this information for the purposes indicated in Krayden's [Online Privacy Policy](#).

The types of Personal Data Krayden collects directly from Consumers includes:

Contact information (such as full name, postal and email address, and phone number);

payment method and billing information;

data collected automatically through Krayden.com (such as IP address, unique device identifier, browser characteristics, device characteristics, operating system, language preferences, referring URLs, information on actions taken on Krayden.com and dates and times of activity);

personal information contained in Consumers' online accounts; and

other personal information found in content Consumers provide, including in communications submitted through the company's contact form and customer support inquiries.

In addition, Krayden obtains Personal Data, such as contact information and financial account information, of its vendors', suppliers' and enterprise customers' representatives. Krayden uses this information to manage its relationships with these parties, process payments, expenses and reimbursements, and carry out Krayden's contractual obligations.

Krayden also may obtain and use Consumer Personal Data in other ways for which Krayden provides specific notice at the time of collection.

Krayden's privacy practices regarding the processing of Consumer Personal Data comply with the Data Privacy Framework Principles of Notice; Choice; Accountability for Onward Transfer; Security; Data Integrity and Purpose Limitation; Access; and Recourse, Enforcement and Liability.

Notice

Krayden provides information in this Policy and the company's [Online Privacy Policy](#) about its Consumer Personal Data practices, including the types of Personal Data Krayden collects, the types of third parties to which Krayden discloses the Personal Data and the purposes for doing so, the rights and choices Consumers have for limiting the use and disclosure of their Personal Data, and how to contact Krayden about its practices concerning



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Personal Data.

In particular, below describes Krayden's legal bases for processing Consumer Personal Data:

Purpose for Processing	Types of Personal Data	Legal Bases:
To provide information about our products and services, process transactions, and administer our business (including by responding to inquiries or requests)	Contact information Payment information Account information Communication information	Legitimate interests (to carry out normal business functions)
To send marketing and promotional materials and communications, identify potential customers	Contact information Account information Communication information Online information	Legitimate interests (to promote our products and services) With a Consumer's consent
To analyze web traffic, improve our websites and online services	Online information	Legitimate interests (to improve and maintain our websites and online services) With a Consumer's consent

Relevant information also may be found in notices pertaining to specific data processing activities. Krayden does not engage in any automated decision-making, including profiling, based upon a Consumer's Personal Data, that produces a legal effect or a similarly significantly affect upon the Consumer. For the sake of clarity, however, Krayden does use cookies and other tracking technologies to personalize a visitor experience. For example, if a Consumer searches for a particular product on a Krayden website, upon a repeat visit to the Krayden website the Consumer may be automatically presented with further information regarding the particular product or a similar product.

Choice

Krayden generally offers Consumers the opportunity to choose whether their Personal Data may be (i) disclosed to third-party Controllers or (ii) used for a purpose that is materially different from the purposes for which the information was originally collected or subsequently authorized by the relevant Consumer. To the extent required by the Data Privacy Framework Principles, Krayden obtains opt-in consent for certain uses and disclosures of Personal Data. Consumers may contact Krayden as indicated below regarding the company's use or disclosure of their Personal Data, including to withdraw consent. Unless Krayden offers Consumers an appropriate choice, the company uses Personal Data only for purposes that are materially the same as those indicated in this Policy.

Krayden shares Consumer Personal Data with its affiliates and subsidiaries. Krayden may disclose Consumer Personal Data without offering an opportunity to opt out, and may be required to disclose the Personal Data, (i) to third-party Processors the company has retained to perform services on its behalf and pursuant to its instructions, (ii) if it is required to do so by law or legal process, or (iii) in response to lawful requests from public authorities, including to meet national security, public interest or law enforcement requirements. Krayden also reserves the right to transfer Personal Data in the event of an audit or if the company sells or transfers all or a portion of its business or assets (including in the event of a merger, acquisition, joint venture, reorganization,



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dissolution or liquidation).

Accountability for Onward Transfer of Personal Data

This Policy and Krayden's [Online Privacy Policy](#) describe Krayden's sharing of Consumer Personal Data.

Except as permitted or required by applicable law, Krayden provides Consumers with an opportunity to opt out of sharing their Personal Data with third-party Controllers. Krayden requires third-party Controllers to whom it discloses Consumer Personal Data to contractually agree to (i) only process the Personal Data for limited and specified purposes consistent with the consent provided by the relevant Consumer, (ii) provide the same level of protection for Personal Data as is required by the Data Privacy Framework Principles, and (iii) notify Krayden and cease processing Personal Data (or take other reasonable and appropriate remedial steps) if the third-party Controller determines that it cannot meet its obligation to provide the same level of protection for Personal Data as is required by the Data Privacy Framework Principles.

With respect to transfers of Consumer Personal Data to third-party Processors, Krayden (i) enters into a contract with each relevant Processor, (ii) transfers Personal Data to each such Processor only for limited and specified purposes, (iii) ascertains that the Processor is obligated to provide the Personal Data with at least the same level of privacy protection as is required by the Data Privacy Framework Principles, (iv) takes reasonable and appropriate steps to ensure that the Processor effectively processes the Personal Data in a manner consistent with Krayden's obligations under the Data Privacy Framework Principles, (v) requires the Processor to notify Krayden if the Processor determines that it can no longer meet its obligation to provide the same level of protection as is required by the Data Privacy Framework Principles, (vi) upon notice, including under (v) above, takes reasonable and appropriate steps to stop and remediate unauthorized processing of the Personal Data by the Processor, and (vii) provides a summary or representative copy of the relevant privacy provisions of the Processor contract to the Department of Commerce, upon request. Krayden remains liable under the Data Privacy Framework Principles if the company's third-party Processor onward transfer recipients process relevant Personal Data in a manner inconsistent with the Data Privacy Framework Principles, unless Krayden proves that it is not responsible for the event giving rise to the damage.

Security

Krayden takes reasonable and appropriate measures to protect Consumer Personal Data from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into account the risks involved in the processing and the nature of the Personal Data.

Data Integrity and Purpose Limitation

Krayden limits the Consumer Personal Data it processes to that which is relevant for the purposes of the particular processing. Krayden does not process Consumer Personal Data in ways that are incompatible with the purposes for which the information was collected or subsequently authorized by the relevant Consumer. In addition, to the extent necessary for these purposes, Krayden takes reasonable steps to ensure that the Personal Data the company processes is (i) reliable for its intended use, and (ii) accurate, complete and current. In this regard, Krayden relies on its Consumers to update and correct the relevant Personal Data to the extent necessary for the purposes for which the information was collected or subsequently authorized. Consumers may contact Krayden as indicated below to request that Krayden update or correct relevant Personal Data.

Subject to applicable law, Krayden retains Consumer Personal Data in a form that identifies or renders



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identifiable the relevant Consumer only for as long as it serves a purpose that is compatible with the purposes for which the Personal Data was collected or subsequently authorized by the Consumer.

Consumer Rights, including Access, Correction, Deletion, and Data Portability

Consumers generally have the right to access their Personal Data, as well as to receive their Personal Data in a format that is transferrable to another Controller. Accordingly, where appropriate, Krayden provides Consumers with reasonable access to the Personal Data Krayden maintains about them. Krayden also provides a reasonable opportunity for those Consumers to correct, amend or delete the information where it is inaccurate or has been processed in violation of the Data Privacy Framework Principles, as appropriate. Krayden may limit or deny access to Personal Data where the burden or expense of providing access would be disproportionate to the risks to the Consumer's privacy in the case in question, or where the rights of persons other than the Consumer would be violated. Consumers may request access to their Personal Data by contacting Krayden as indicated below.

Recourse, Enforcement and Liability

Krayden has mechanisms in place designed to help assure compliance with the Data Privacy Framework Principles. Krayden conducts an annual self-assessment of its Consumer Personal Data practices to verify that the attestations and assertions Krayden makes about its Data Privacy Framework privacy practices are true and that Krayden's privacy practices have been implemented as represented and in accordance with the Data Privacy Framework Principles.

Consumers may file a complaint concerning Krayden's processing of their Personal Data. Krayden will take steps to remedy issues arising out of its alleged failure to comply with the Data Privacy Framework Principles. Consumers may contact Krayden as specified below about complaints regarding Krayden's Consumer Personal Data practices.

If a Consumer's complaint cannot be resolved through Krayden's internal processes, Krayden will cooperate with JAMS pursuant to the JAMS Data Privacy Framework Program, which is described on the JAMS website at <https://www.jamsadr.com/dpf-dispute-resolution>. JAMS mediation may be commenced as provided for in the JAMS rules. Following the dispute resolution process, the mediator or the Consumer may refer the matter to the U.S. Federal Trade Commission, which has Data Privacy Framework investigatory and enforcement powers over Krayden. Under certain circumstances, Consumers also may be able to invoke binding arbitration to address complaints about Krayden's compliance with the Data Privacy Framework Principles.

How to Contact Krayden

To contact Krayden with questions or concerns about this Policy or Krayden's Consumer Personal Data practices:

Write to:

Krayden, Inc.
1491 W. 124th Ave.
Denver, CO 80234

E-mail:

privacy@krayden.com