

PRIVACY POLICY

Last Updated: June 16, 2023

- 1. Purpose.** Beekley Corporation is committed to protecting your privacy. We leverage the latest technology to give you the most powerful and safe online experience. This Privacy Policy (the “Policy”) applies to the Beekley Corporation website and family of websites (collectively referred to as “websites”), and to any other service or electronic communication (collectively referred to as “services”) with us. By using our websites and services, you consent to the data practices described in this Policy.

The Policy intends to provide you with information about what personal information we collect about you, how we use that information, and under what circumstances we disclose your information. It further describes your rights under the Connecticut Data Privacy Act; the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020; the Colorado Privacy Act; the Utah Consumer Privacy Act; Nevada Revised Statutes Chapter 603A; the Virginia Consumer Data Protection Act; the European Union privacy law (General Data Protection Regulation); and other applicable privacy laws (collectively referred to as “Privacy Laws”). We take commercially reasonable steps to maintain compliance with the Privacy Laws.

You may contact us for any questions, comments, or concerns using the contact information provided in the last section of this Policy, and for exercising your privacy rights as described in this Policy.

Lastly, we may update and make changes to this Policy, so we encourage you to review it periodically.

- 2. Key Terms.** Let us start by explaining some key terms used in this Policy:

We, us, our, company	Beekley Corporation, Beekley Medical, Prestige Lane Hospitality Brands, WMB Enterprises
Personal information	Any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked with a particular consumer or household. Examples of personal information are as follows: Real name, alias, postal

	<p>address, online identifier, internet protocol (IP) address, email address, telephone number, account name, or other similar identifiers; commercial information such as records of products purchased, obtained, or considered, or other purchasing or consuming histories or tendencies; online payment history; internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement; inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer's preferences, characteristics, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p>
Sensitive personal information	<p>Specific subset of personal information revealing a consumer's social security number; log-in account numbers and credentials; financial account, debit card, or credit card number with any security code; precise geolocation; biometric information; contents of a consumer's mail, email, and text messages where the business is not the intended recipient; genetic data; information concerning health, sex life, or sexual orientation; information about racial or ethnic origin, religious, political, or philosophical beliefs; union membership; information concerning immigration or citizenship status.</p>
De-identified information	<p>Information that cannot reasonably be used to infer information about an identified or identifiable individual.</p>
Public information	<p>Information that is lawfully made available through federal, state, or local government records or widely distributed media, or that</p>

	we have reason to believe that it was lawfully made available to the public.
Aggregate consumer information	Information that relates to a group or category of consumers, from which individual consumer identities have been removed. Information that is not linked or reasonably linkable to any consumer or household.
Sharing personal information	Sharing, renting, releasing, or disclosing a consumer’s personal information by the business to a third party for cross-context behavioral advertising, whether for monetary gain or other valuable consideration.

3. Information We Collect About You. We may collect, or have collected in the preceding 12 months, the following personal information from you:

- Real name, alias, postal address, online identifier, internet protocol (IP) address, email address, telephone number, account name.
- Commercial information such as records of products purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- Online payment history.
- Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with our websites or advertisements.
- Inferences drawn from any of the information identified in this subdivision to create a profile about you reflecting your preferences, characteristics, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
- Sensitive personal information
 - An account log-in.
 - Financial account, debit card, or credit card number with any required security code.
 - Password or credentials allowing access to an account.
 - Precise geolocation.
 - Contents of mail, email, and text messages as they relate to doing business with us.
 - Information concerning health.

Personal information does not include publicly available information, de-identified information, or aggregate consumer information.

We obtain your consent before collecting your sensitive personal information. We do not collect your social security number; biometric information; genetic data; information about your sex life or sexual orientation; information about your racial or ethnic origin, your religious, political, or philosophical beliefs; information about your immigration or citizenship status; or union membership. We may collect sensitive personal information, such as the social security number, during one's employment with our company for either establishing or maintaining their employment relationship.

4. Children Under the Age of 13. This website is not directed to children under the age of thirteen. We do not knowingly collect information from children under the age of thirteen without the prior parental or guardian consent. If you are a child under the age of thirteen, do not use or provide any information on this website or through any of its features; create an account on or subscribe to this website; make any purchases through this website; or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or username you may use. If we learn that we have collected personal information of a child under the age of thirteen without the child's parental or guardian consent, we will delete the information. If you wish to find out whether your child has accessed our websites or services, or wish to ask that we remove your child's personal information from our servers, please contact us at info@beekley.com, or via our toll-free telephone number at 1.800.233.5539 or Customer Care at +1.860.583.4700. We are open Monday through Friday, 8:00 am to 5:00 pm Eastern Time.

5. How We Collect Your Personal Information. We collect most of your personal information directly from you—in person, by telephone, text, email, or via our websites. We may also collect information from the following categories of sources:

- Publicly accessible sources, e.g., property records, social media accounts.
- Third party, e.g., credit reporting agencies, customer due diligence providers, advertising networks, internet service providers, social networks, data analytics providers, government entities, and data brokers.
- Third party with your consent, e.g., your bank.
- Website cookies. Cookies are small files sent to your browser from websites you visit. Cookies cannot be used to run programs or deliver viruses to your computer or cell phone, are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you. You can accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the websites you visit or services you obtain.

- Automated information collection techniques such as web beacons. Also known as a web bug, pixel tag, or clear GIF – a web beacon is a clear graphic image that is delivered through a web browser or HTML email. The web beacon operates as a tag that records an end user’s visit to a particular web page or viewing of a particular email. It is also often used in conjunction with a web cookie, and provided as part of a third-party tracking service.
- Our IT systems, including:
 - Door entry systems and reception logs;
 - Automated monitoring of our websites and other technical systems, such as our computer networks, connections, customer databases; access control systems; communications systems; email and instant messaging systems.

Where authorized by us, third-party vendors and hosting partners who provide the necessary hardware, software, networking, storage, and related technology for the operation of our websites may also use cookies or other monitoring technologies to compile anonymous statistics about our website visitors. No personally identifiable information is transferred to these third parties.

6. Why We Use Your Personal Information. We do not collect personal information or sensitive personal information that we do not need. We collect, or have collected within the last 12 months, your personal information for the following business purposes:

- Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
- Helping to ensure security and integrity to the extent the use of your personal information is reasonably necessary and proportionate for these purposes.
- Debugging to identify and repair errors that impair existing intended functionality.
- Short-term, transient use, including, but not limited to, non-personalized advertising shown as part of your current interaction with our business, provided your personal information is not disclosed to another third party and is not used to build a profile about you or otherwise alter your experience outside the current interaction with our business.
- Performing services on behalf of our business, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of our business.

- Providing advertising and marketing services, except for cross-context behavioral advertising, to the consumer.
- Undertaking internal research for technological development and demonstration.
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by our business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by our business.
- To comply with our legal and regulatory obligations.
- For the performance of our contract with you or to take steps at your request before entering into a contract with you.
- For our legitimate interests or those of a third party.
- Where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and our reasons for doing so:

What we use your personal information for	Our reasons
To provide products or services to you.	For the performance of our contract with you or to take steps at your request before entering into a contract with you.
To prevent and detect fraud against you.	For our legitimate interests or those of a third party, i.e., to minimize fraud that could be damaging for us and for you.
<p>Conducting checks to identify our customers and verify their identity.</p> <p>Screening for financial and other sanctions or embargoes.</p> <p>Other processing necessary to comply with professional, legal, and regulatory obligations that apply to our business, e.g., under health and safety regulation or rules issued by our professional regulator.</p>	To comply with our legal and regulatory obligations.

Gathering and providing information required by or relating to audits, enquiries, or investigations by regulatory bodies.	To comply with our legal and regulatory obligations.
Ensuring business policies are adhered to, e.g., policies covering security and internet use.	For our legitimate interests or those of a third party, i.e., to make sure we are following our own internal procedures so we can deliver the best service to you.
Operational reasons, such as improving efficiency, training, and quality control.	For our legitimate interests or those of a third party, i.e., to be as efficient as we can so we can deliver the best products or services for you at the best price.
Ensuring the confidentiality of commercially sensitive information.	For our legitimate interests or those of a third party, i.e., to protect trade secrets and other commercially valuable information. To comply with our legal and regulatory obligations.
Statistical analysis to help us manage our business, e.g., in relation to our financial performance, customer base, product range or other efficiency measures.	For our legitimate interests or those of a third party, i.e., to be as efficient as we can so we can deliver the best products or services for you at the best price.
Preventing unauthorized access and modifications to systems.	For our legitimate interests or those of a third party, i.e., to prevent and detect criminal activity that could be damaging for us and for you. To comply with our legal and regulatory obligations.

<p>Updating and enhancing customer records.</p>	<p>For the performance of our contract with you or to take steps at your request before entering into a contract with you.</p> <p>To comply with our legal and regulatory obligations.</p> <p>For our legitimate interests or those of a third party, e.g., making sure that we can keep in touch with our customers about existing orders and new products.</p>
<p>Statutory returns.</p>	<p>To comply with our legal and regulatory obligations.</p>
<p>Ensuring safe working practices, staff administration and assessments.</p>	<p>To comply with our legal and regulatory obligations.</p> <p>For our legitimate interests or those of a third party, e.g., to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you.</p>
<p>Marketing our services and those of selected third parties to:</p> <ul style="list-style-type: none"> —existing and former customers; —third parties who have previously expressed an interest in our services; —third parties with whom we have had no previous dealings. 	<p>For our legitimate interests or those of a third party, i.e., to promote our business to existing and former customers.</p>
<p>Credit reference checks via external credit reference agencies.</p>	<p>For our legitimate interests or those of a third party, i.e., to ensure our customers are likely to be able to pay for our products and services.</p>

<p>External audits and quality checks, e.g., for accreditations and the audit of our accounts.</p>	<p>For our legitimate interests or those of a third party, i.e., to maintain our accreditations so we can demonstrate we operate at the highest standards.</p> <p>To comply with our legal and regulatory obligations.</p>
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7. Categories of Personal Information We Disclose for a Business Purpose. We may disclose, or in the preceding 12 months have disclosed, the following categories of personal information for a business purpose:

- Information that identifies, relates to, describes, or is capable of being associated with you, including, but not limited to, your name, signature, mailing address, telephone number, Internet Protocol address, email address, online account name, credit card number, debit card number, or any other financial information or similar identifiers.
- Commercial information, e.g., products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- Internet or other electronic network activity information, e.g., browsing history, search history, and information regarding your interaction with our websites or advertisements.
- Geolocation data.
- Professional or employment-related information (of our employees only).

If you directly disclose your personal information through Beekley Corporation’s social media accounts such as Facebook, LinkedIn, Twitter, and Instagram, this information may be collected and used by others.

8. When We Disclose Your Information. We may disclose, or have disclosed within the last 12 months, your personal information under the following circumstances:

- With your consent.
- To fulfill the very request for which you provided your information.
- To enforce any agreement we may have with you.
- For billing or collection, managerial or administrative purposes.
- To perform statistical analysis.
- To arrange for the delivery of product(s) that you purchase from us.

- To our employees for performance of their official duties. Our employees who receive personal information are required to keep the information strictly confidential.
- If we are required by law.
- If disclosure is necessary to protect the rights and safety of our company or employees. This includes disclosing your information per a court order or a subpoena, or to other organizations such as federal, state, or local law enforcement agencies in situations involving violations of federal, state, or local laws.
- To exercise or defend a legal claim.
- Under exigent circumstances to protect the personal safety of our users or the public.

9. Who We Disclose Your Personal Information To. We may disclose, or have disclosed in the preceding 12 months, your personal information to:

- Service providers we use to help deliver our products or services to you, such as payment service providers, IT vendors, warehouses and delivery companies.
- Other third parties we use to help us run our business, such as marketing agencies or website hosts.
- Third parties approved by you, including social media sites you choose to link your account to or third-party payment providers.
- Credit reporting agencies.
- Our insurers and brokers.
- Our banks.
- External auditors.

Third parties and service providers that we do business with are under contractual obligations to ensure they only use your personal information to provide services to us and to you.

10. Categories of Personal Information We Sell or Share. We do not sell or share, and in the last 12 months have not sold or shared your personal information, and will not do so in the future without providing you with notice and an opportunity to opt-out of such sale or sharing.

11. How Long We Keep Your Personal Information. We will keep your personal information while you have an account with us or while we are providing products or services to you. Thereafter, we will keep your personal information for as long as is necessary:

- To respond to any questions, complaints, or claims made by you or on your behalf.
- To show that we treated you fairly.
- To keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this Policy. Different retention periods apply for different types of personal information.

12. Security of Your Personal Information. Beekley Corporation secures your personal information and sensitive personal information from unauthorized or illegal access, use, modification, destruction, or disclosure. We store the information on computer servers in a controlled, secure environment, protected from unauthorized or illegal access, use, modification, destruction, or disclosure. When sensitive personal information, such as a credit card number, is transmitted to other websites, it is protected using encryption, such as the Secure Socket Layer (SSL) protocol. In the event of a data security breach, we will notify you without undue delay after becoming aware of the breach.

13. Other Websites. Beekley Corporation encourages you to review the privacy statements of websites you choose to link to from our websites so that you can understand how those websites collect, use, and share your information. We are not responsible for the privacy statement or other content on third-party websites.

14. Know Your Privacy Rights. Depending on where you live, you may exercise some or all the following rights:

Right to be Notified	You have the right to be notified before or at the point we collect your personal information, of the types of personal information we are collecting and what we may do with that information.
Disclosure of Personal Information We Collect About You	You have the right to know and request disclosure of: <ul style="list-style-type: none"> • The categories of personal information we have collected about you, including sensitive personal information. • The categories of sources from which the personal information is collected.

	<ul style="list-style-type: none"> • Our business or commercial purpose for collecting personal information. • The categories of third parties to whom we disclose personal information. • The specific pieces of personal information we have collected about you. <p>We are not required to:</p> <ul style="list-style-type: none"> • Retain any personal information about you that was collected for a single one-time transaction if, in the ordinary course of business, that information about you is not retained. • Reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered personal information. • Provide the personal information to you more than twice in a 12-month period.
<p>Disclosure of Personal Information Sold, Shared, or Disclosed for a Business Purpose</p>	<p>Beekley Corporation does not sell or share your personal information.</p> <p>In connection with any personal information we may disclose to a third party for a business purpose, you have the right to know the categories of personal information that we disclosed about you for a business purpose and the categories of persons to whom the personal information was disclosed for a business purpose in the 12-month period preceding your request.</p>
<p>Right to Obtain a Copy</p>	<p>You have the right to ask for a copy of your personal information received or processed by us for the 12-month period preceding your request.</p>
<p>Right to Opt-Out</p>	<p>We do not sell or share your personal information and will not do so in the future</p>

	<p>without providing you with notice. Should we begin to sell or share your personal information, you have the right to request that we stop selling and sharing your personal information (“opt-out”). We cannot sell or share your personal information after we receive your opt-out request unless you later authorize us to do so again.</p>
Right to Consent	<p>If the processing of information is based on your consent, you may withdraw your consent at any time.</p>
Right to Limit Use of Sensitive Personal Information	<p>You have the right to limit the use and disclosure of your sensitive personal information to the use which is necessary for our business to:</p> <p>Perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services.</p> <p>Perform the following services: (1) Helping to ensure security and integrity to the extent the use of your personal information is reasonably necessary and proportionate for these purposes; (2) Short-term, transient use, including, but not limited to, non-personalized advertising shown as part of your current interaction with our business, provided that your personal information is not disclosed to a third party and is not used to build a profile about you or otherwise alter your experience outside the current interaction with us; (3) Performing services on behalf of our business, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of us; and (4) Undertaking</p>

	<p>activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us.</p> <p>As authorized by further regulations.</p> <p>You have a right to know if your sensitive personal information may be used, or disclosed to a service provider or contractor, for additional, specified purposes.</p>
<p>Right to Deletion</p>	<p>Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:</p> <ul style="list-style-type: none"> • Delete your personal information from our records and direct any service providers or contractors to delete your personal information from their records. • Direct third parties to whom the business has sold or shared your personal information to delete your personal information unless this proves impossible or involves disproportionate effort. (As mentioned earlier in this Policy, Beekley Corporation does not sell or share your information.) <p>We may not delete your personal information if it is reasonably necessary to:</p> <ul style="list-style-type: none"> • Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with

	<p>you, or otherwise perform a contract between you and us.</p> <ul style="list-style-type: none"> • Help to ensure security and integrity to the extent the use of the consumer’s personal information is reasonably necessary and proportionate for those purposes. • Debug to identify and repair errors that impair existing intended functionality. • Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law. • 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 our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent. • Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us. • Comply with an existing legal obligation. • Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.
<p>Right of Correction</p>	<p>If we maintain inaccurate personal information about you, you have the right to request us to correct that inaccurate personal information. Upon receipt of a verifiable request from you, we will use commercially reasonable efforts to correct the inaccurate personal information.</p>
<p>Protection Against Retaliation or Discrimination</p>	<p>You have the right to not be retaliated or discriminated against by us because you</p>

	<p>exercised any of your rights under the Privacy Laws. This means we cannot, among other things:</p> <ul style="list-style-type: none">• Deny goods or services to you.• Charge different prices or rates for goods or services, including by using discounts or other benefits or imposing penalties.• Provide a different level or quality of goods or services to you.• Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services. <p>If you refuse to provide your personal information to us or ask us to delete your personal information, and that personal information is necessary for us to provide you with goods or services, we may not be able to complete that transaction.</p>
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15. How to Exercise Your Rights. If you would like to exercise any of your rights as described in this Privacy Policy, you may do so by emailing us at info@beekley.com, or calling our toll-free telephone number at 1.800.233.5539 or Customer Care at +1.860.583.4700. We are open Monday through Friday, 8:00 am to 5:00 pm Eastern Time.

If you choose to contact us directly by website, email, phone, or in writing, you will need to provide us with:

- Enough information to identify you, e.g., your full name, address, and customer or matter reference number.
- Proof of your identity and address, e.g., a copy of your driver’s license or passport and a recent utility bill.
- A description of what right you want to exercise and the information to which your request relates.

We endeavor to respond to a consumer request within 45 calendar days of its receipt. If we require more time (up to 90 days) to respond, we will notify you of the reason and extension period in writing.

To protect your information and the integrity of our products, we may need to verify your identity before processing your request. In some cases, we may need to collect additional

information to verify your identity, such as a government issued ID. Any personal information we collect from you to verify your identity in connection with your request will be used solely for verification.

We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 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. For instance, we may not accommodate a request to change information if we believe the change would violate any law or legal requirement, or cause the information to be incorrect. We may also deny a request if the request is manifestly unfounded or excessive, or we have already provided personal information to you more than twice in a 12-month period.

Upon request, we will also provide you with information about whether we hold or process, on behalf of a third party, any of your personal information that we are aware of.

Under certain Privacy Laws, you may also designate an authorized agent to make these requests on your behalf. Your agent may submit a request via the same methods described at the beginning of this section. If you use an authorized agent to submit a request, we may need to collect additional information from you or your authorized agent to verify that you are the person directing the agent.

16. Changes to this Policy. Beekley Corporation will occasionally update this Policy based on emerging Privacy Laws. We encourage you to periodically review this Policy to be informed of how Beekley Corporation is protecting your information. If we make material changes to how we treat your personal information, we will notify you by email to the primary email address specified in your account and through a notice on our websites home page.

17. How to Contact Us. Beekley Corporation welcomes your questions, comments, or concerns regarding this Policy. If you believe that Beekley Corporation has not adhered to this Policy, please email Beekley Corporation at info@beekley.com, or call our toll-free telephone number at 1.800.233.5539 or Customer Care at +1.860.583.4700. We are open Monday through Friday, 8:00 am to 5:00 pm Eastern Time. You may also mail us at Beekley Corporation, 1 Prestige Lane, Bristol, Connecticut 06010, U.S.A. We will use commercially reasonable efforts to promptly remedy the problem should there be one.