

## Privacy Policy

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and our information practices, meaning how and why we collect, use, disclose, sell, share, store, and retain your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint or request.

We collect, use, and are responsible for certain personal information about you. When we offer goods and/or services to individuals residing in the European Economic Area (EEA), we are subject to the EU General Data Protection Regulation (EU GDPR). For California consumers, we are subject to the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act of 2020 (CPRA). We may be responsible as a "controller" or a "processor", depending on the circumstances, of that personal information for the purposes of the GDPR. We are responsible for your personal information that we possess or control as a "business" under the CCPA/CPRA.

### 1. **Key Terms.** These are some key terms used in this policy:

We, us, our	Forward Solutions; LLC, including its affiliates and divisions: Avison, Curate, C3 Team, ElectroRep, Fields Electrical Sales, One Solution, Philp J. Boren, RB Sales, RelyPak, Struxur, and Xpand Demand ("Forward Solutions", "We", or "Us")
Our representative	Briskin, Cross & Sanford, LLC
Our data protection officer	Paul Dennis Paul.Dennis@forward-solutions.com
Personal information	Any information relating to an identified or identifiable individual.
Special category personal information	Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs, or trade union membership; genetic and biometric data; and data concerning health, sex life or sexual orientation.
Sensitive Personal Information	Personal information revealing a consumer's social security number, driver's license and passport numbers, account numbers and credentials, precise geolocation, racial or ethnic origin, religious beliefs, or union membership, personal information concerning a consumer's health, sex life, or sexual orientation, contents of a consumer's mail, email and text messages where the business is not the intended recipient, genetic data, biometric information, or citizenship and immigration status.

Biometric Information

An individual's physiological, biological, or behavioral characteristics, including information pertaining to an individual's deoxyribonucleic acid (DNA), that is used or is intended to be used singly or in combination with each other or with other identifying data, to establish individual identity. Biometric information includes, but is not limited to, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.

**2. Personal Information We Collect About You.** We may collect and use the following personal information, including sensitive personal information, that identifies, relates to, describes, is reasonable capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household:

Categories of Personal Information	Specific Types of Personal Information Collected
Identifiers (e.g., 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)	Your real name, alias, work postal address, unique personal identifier, online identifier, Internet Protocol address, work email address, or other similar identifiers.
Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her 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.	Your work address, work phone number, work email address, employment, and/or employment history.

Characteristics of protected classifications under state or federal law.	None.
Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies)	Records of products or services considered or inquired about.
Biometric information	None.
Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement)	Information regarding your interaction with an Internet Web site, application, or advertisement
Geolocation data	None.
Audio, electronic, visual, thermal, olfactory, or similar information	None.
Professional or employment-related information	Publicly available information regarding your profession, current employer, and past employers.
Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (FERPA)	None.
Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	Inferences drawn from any of the information identified above to create a profile about you reflecting your interest in certain products or services.

If you do not provide personal information required to provide products AND/OR services to you, it may delay or prevent us from providing products AND/OR services to you.

**3. How Your Personal Information is Collected.** We collect personal information from the following categories of sources:

- You, directly in person, by telephone, text, or email
- Third party with your consent (e.g., your bank)
- Advertising networks
- Internet service providers
- Data analytics providers
- Government entities
- Operating systems and platforms
- Social networks

- Data brokers
- Publicly accessible sources (e.g., property records)
- Cookies and/or other tracking technology on our website and/or apps
- Our IT and security systems, including:
  - o Automated monitoring of our websites and other technical systems, such as our computer networks and connections, communications systems, email, and instant messaging systems –and–

**4. How and Why We Use Your Personal Information.** Under data protection laws, we can only use your personal information if we have a proper reason for doing so, for example:

- 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
- For our legitimate interests or those of a third party –or–
- 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 AND/OR services to you	For the performance of our contract with you or to take steps at your request before entering into a contract
To prevent and detect fraud against you or Forward Solutions	For our legitimate interests or those of a third party, i.e., to minimize fraud that could be damaging for us and for you
Conducting checks to identify our customers and verify their identity; Screening for financial and other sanctions or embargoes; 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	To comply with our legal and regulatory obligations
Gathering and providing information required by or relating to audits, inquiries 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

Operational reasons, such as improving efficiency, training, and quality control

Ensuring the confidentiality of commercially sensitive information

Statistical analysis to help us manage our business, e.g., in relation to our financial performance, customer base, product range or other efficiency measures

Preventing unauthorized access and modifications to systems

Updating and/or enhancing customer records

Statutory returns

Ensuring safe working practices, staff administration and assessments

so we can deliver the best service to you

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 service for you at the best price

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

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 service for you at the best price

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

For the performance of our contract with you or to take steps at your request before entering into a contract

To comply with our legal and regulatory obligations

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

To comply with our legal and regulatory obligations

To comply with our legal and regulatory obligations

For our legitimate interests or those of a third party, e.g., to make sure we are following our own internal procedures

Marketing our services and those of selected third parties to:

- 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

Credit reference checks via external credit reference agencies

External audits and quality checks, e.g., for ISO or Investors in People accreditation and the audit of our accounts

and working efficiently so we can deliver the best service to you

For our legitimate interests or those of a third party, i.e., to promote our business to existing and former customers

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

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 To comply with our legal and regulatory obligations

For EEA Data Subjects: The above table does not apply to special category personal information, which we will only process with your explicit consent.

**5. EEA Data Subjects: Promotional Communications.** We may use your personal information to send you updates (by email, text message, telephone, or post) about our products AND/OR services including exclusive offers, promotions or new products AND/OR services.

We have a legitimate interest in processing your personal information for promotional purposes (see above "How and why we use your personal information"). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and will only share it with those manufacturers whom we represent to provide you with products AND/OR services.

You have the right to opt out of receiving promotional communications at any time by:

- Contacting us at [marketing@forward-solutions.com](mailto:marketing@forward-solutions.com)
- Using the "unsubscribe" link in emails or "STOP" number in texts or

We may ask you to confirm or update your marketing preferences if you instruct us to provide further products AND/OR services in the future, or if there are changes in the law, regulation, or the structure of our business.

**6. Who We Share Your Personal Information With.** We routinely share personal information with:

- Our affiliates, including companies within the Forward Solutions group
- Service providers we use to help deliver our products and/or services to you, such as payment service providers, 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 bank[s]
- Those manufacturers whom we represent to provide you with products AND/OR services.

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers relating to ensure they can only use your personal information to provide services to us and to you. We may also share personal information with external auditors, accreditation, and the audit of our accounts. We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. We will typically anonymize information, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

**7. Personal Information We Have Not Sold or Shared.** In the preceding 12 months, we **have not sold or disclosed** to one or more third parties the following categories of personal 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:

- Identifiers (e.g., a social security number, driver's license number, passport number, or other similar identifiers);
- Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences.
- Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her signature, social security number, physical characteristics or description, passport number, driver's license or state identification card number, insurance policy number, education, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information;
- Characteristics of protected classifications under California or federal law;
- Commercial information (e.g., records of personal property, products or services purchased, obtained);
- Biometric information;
- Geolocation data;
- Audio, electronic, visual, thermal, olfactory, or similar information;

- Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (FERPA); and
- Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, personal address, personal telephone number, personal email address, education; and
- Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

**8. Categories of Personal Information We Disclosed for a Business Purpose.** In the preceding 12 months, we *have or may have* disclosed the following categories of personal information for a business purpose:

- Identifiers (e.g., a real name, alias, online identifier, Internet Protocol address, work email address, account name, or other similar identifiers)
- Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, business address, business telephone number,
- 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 a consumer's interaction with an Internet Web site, application, or advertisement)
- Professional or employment-related information

**9. How Long Your Personal Information Will Be Kept.** We will keep your personal information while you have an account with us or while we are providing products AND/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 –or–
- 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. Routinely, our data retention period is thirty-six (36) months in active status, after which data is archived.

When it is no longer necessary to retain your personal information, we will delete or anonymize it.

**10. California Consumers: Your Rights Under the CCPA/CPRA.** You have the right under the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights



Act of 2020 (CPRA), and certain other privacy and data protection laws, as applicable, to exercise free of charge:

Disclosure of Personal Information We Collect About You	You have the right to know, and request disclosure of: <ul style="list-style-type: none"><li>• The categories of personal information we have collected about you, including sensitive personal information</li><li>• The categories of sources from which the personal information is collected</li><li>• Our business or commercial purpose for collecting, selling, or sharing personal information</li><li>• The categories of third parties to whom we disclose personal information, if any –and–</li><li>• The specific pieces of personal information we have collected about you</li></ul>	Please note that we are not required to: <ul style="list-style-type: none"><li>• 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</li><li>• 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 – or–</li><li>• Provide the personal information to you more than twice in a 12-month period</li></ul>
Disclosure of Personal Information Sold, Shared, or Disclosed for a Business Purpose	In connection with any personal information we may sell, share, or disclose to a third party for a business purpose, you have the right to know: <ul style="list-style-type: none"><li>• The categories of personal information about you that we sold or shared and the categories of third parties to whom the personal information was sold or shared –and–</li><li>• The categories of personal information that we disclosed about you for a business purpose and the categories of persons to</li></ul>	You have the right to opt-out of the sale of your personal information or sharing of your personal information for the purpose of targeted behavioral advertising. If you exercise your right to opt-out of the sale or sharing of your personal information, we will refrain from selling or sharing your personal information, unless you subsequently provide express authorization for the sale or sharing of your personal information.

**To opt-out of the sale or sharing of your personal information, visit our homepage and click on the Do Not Sell or Share My Personal Information link here:**

**[www.forward-solutions.com](http://www.forward-solutions.com)**].

	whom the personal information was disclosed for a business purpose		
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 to:</p> <ul style="list-style-type: none"><li>• Perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services</li><li>• To perform the following services: (1) Helping to ensure security and integrity to the extent the use of the consumer's 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 a consumer's current interaction with the business, provided that the consumer's personal information is not disclosed to another third party and is not used to build a profile about the consumer or otherwise alter the consumer's experience outside the current interaction with the business; (3) Performing services on behalf of the business, including maintaining or servicing accounts, providing</li></ul>	<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><b>To limit the use of your sensitive personal information, visit our homepage and click on the "Limit the Use of My Sensitive Personal Information" link here:</b> <a href="http://www.forward-solutions.com">[www.forward-solutions.com]</a></p>

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 the business; and  
 (4) Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business – and–

- As authorized by further regulations

Right to  
Deletion

Subject to certain exceptions Please note that we may not set out below, on receipt of a delete your personal verifiable request from you, we information if it is reasonably will: necessary to:

- Delete your personal information from our records –for which the personal and– information was collected,
- Direct any service providers fulfill the terms of a written or contractors to delete your warranty or product recall personal information from conducted in accordance their records with federal law, provide a
- Direct third parties to whom good or service requested by the business has sold or shared you, or reasonably your personal information to anticipated within the delete your personal context of our ongoing information unless this proves business relationship with you, or otherwise perform a

impossible or involves contract between you and us  
disproportionate effort

- 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
- Comply with the California Electronic Communications Privacy Act
- 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 –or–
- Otherwise use your

personal information,  
internally, in a lawful manner  
that is compatible with the  
context in which you  
provided the information

Right of  
Correction

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.

Protection  
Against  
Retaliation

You have the right to not be retaliated against by us because you exercised any of your rights under the CCPA/CPRA. This means we cannot, among other things:

- Deny goods or services to you
- Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties
- Provide a different level or quality of goods or services to you –or–
- Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services

Please note that we may charge a different price or rate or provide a different level or quality of goods and/or services to you, if

that difference is reasonably related to the value provided to our business by your personal information. We may also offer loyalty, rewards, premium features, discounts, or club card programs consistent with these rights or payments as compensation, for the collection of personal information, the sale of personal information, or the retention of personal information.

#### 11. Other State-Specific Privacy Rights

In addition to the rights provided under the California Consumer Privacy Act (CCPA), residents of certain U.S. states may have additional privacy rights. These include, but are not necessarily limited to:

- **Colorado Residents**
  - The Colorado Privacy Act (CPA) provides Colorado residents with the following rights:
    - Access their personal data;
    - Correct inaccuracies in their personal data;
    - Delete their personal data;
    - Obtain their personal data in a portable format;
    - Opt out of the processing of personal data for targeted advertising, sale of personal data, or profiling.
  - If we refuse to take action on your request, you may have the right to appeal our decision. Instructions on how to appeal will be included in our response to your request.
- **Connecticut Residents**
  - Under the Connecticut Data Privacy Act (CTDPA), Connecticut residents have the right to:
    - Access their personal data;
    - Correct inaccuracies in their personal data;
    - Delete their personal data;
    - Obtain a copy of their personal data in a portable format;
    - Opt out of the processing of personal data for targeted advertising, sale of personal data, or profiling.

- If we refuse to take action on your request, you may have the right to appeal our decision. Instructions on how to appeal will be included in our response to your request.
- **Florida Residents**
  - Under the Florida Digital Bill of Rights (FDBR), Florida residents have the right to:
    - Access their personal data;
    - Correct inaccuracies in their personal data;
    - Delete their personal data;
    - Opt out of the sale or sharing of their personal data;
    - Opt out of targeted advertising.
- **Iowa Residents**
  - Iowa residents have the following rights regarding their personal data:
    - Right to access;
    - Right to delete;
    - Right to data portability;
    - Right to opt-out of targeted advertising, sale of personal data, and profiling.
- **Maryland Residents**
  - Maryland residents have the following rights regarding their personal data:
    - Right to access;
    - Right to delete;
    - Right to data portability;
    - Right to opt-out of targeted advertising and sale of personal data.
- **Minnesota Residents**
  - Minnesota residents have the following rights regarding their personal data:
    - Right to access;
    - Right to delete;
    - Right to data portability;
    - Right to opt-out of targeted advertising and sale of personal data.
- **Montana Residents**
  - Montana residents have the following rights regarding their personal data:
    - Right to access;
    - Right to delete;
    - Right to data portability;
    - Right to opt-out of targeted advertising and sale of personal data.
- **New Hampshire Residents**
  - New Hampshire residents have the following rights:
    - Access, correction, deletion, and portability of their personal data;

- Opt-out of targeted advertising, sale of personal data, or profiling.
- **Nebraska Residents**
  - Nebraska residents have the right to:
    - Access their personal data;
    - Correct inaccuracies;
    - Delete their personal data;
    - Opt-out of targeted advertising, sale of personal data, and profiling.
- **New Jersey Residents**
  - New Jersey residents have the following rights under the NJDPA:
    - Right to access personal data;
    - Right to correct inaccuracies;
    - Right to delete personal data;
    - Right to data portability;
    - Right to opt-out of targeted advertising, sale of personal data, and certain profiling.
- **Oregon Residents**
  - Oregon residents have the following rights regarding their personal data:
    - Right to access;
    - Right to delete;
    - Right to correct inaccuracies;
    - Right to data portability;
    - Right to opt-out of targeted advertising, sale of personal data, and certain profiling.
    - Right to Obtain List of Third Parties (Effective July 1, 2025): You will have the right to obtain a list of the specific third parties, other than processors, to whom the controller has disclosed the consumer's personal data.
- **Texas Residents**
  - Texas residents have the following rights regarding their personal data:
    - Right to access;
    - Right to delete;
    - Right to correct inaccuracies;
    - Right to data portability;
    - Right to opt-out of targeted advertising, sale of personal data, and certain profiling.
- **Utah Residents**
  - The Utah Consumer Privacy Act (UCPA) provides Utah residents with the following rights:
    - Access their personal data;
    - Delete their personal data;
    - Obtain their personal data in a portable format;

- Opt out of the sale of their personal data or the processing of personal data for targeted advertising.
- **Virginia Residents**
  - Under the Virginia Consumer Data Protection Act (VCDPA), Virginia residents have the right to:
    - Access their personal data;
    - Correct inaccuracies in their personal data;
    - Delete their personal data;
    - Obtain a copy of their personal data in a portable format;
    - Opt out of the processing of personal data for targeted advertising, sale of personal data, or profiling.
  - If we refuse to take action on your request, you may have the right to appeal our decision. Instructions on how to appeal will be included in our response to your request.

**12. Non-Discrimination.**

We will not discriminate against you for exercising your privacy rights. This means we will not deny you goods or services, charge you different prices or rates, or provide you with a different level or quality of goods or services just because you exercised your rights under these state privacy laws.

**13. Universal Opt-Out Mechanisms**

Effective January 1, 2025, we will honor user-enabled global privacy controls, such as a browser plug-in or privacy setting, device setting, or other mechanism, that communicate or signal the consumer's choice to opt out of the sale and sharing of their personal information.

**14. Automated Decision-Making and Profiling**

We may use automated decision-making and profiling in certain circumstances. You have the right to:

- Obtain human intervention
- Express your point of view
- Obtain an explanation of the decision reached
- Challenge such decisions

**15. Data Security Measures**

We implement and maintain reasonable security procedures and practices appropriate to the nature of the personal information we collect and process. These measures include:

- Encryption of personal data at rest and in transit
- Regular security assessments and penetration testing
- Employee training on data protection and security best practices
- Access controls and authentication mechanisms
- Incident response and data breach notification procedures

**16. Targeted Advertising Opt-Out**

You have the right to opt out of the processing of your personal data for targeted advertising purposes. To exercise this right, please visit our "Do Not Sell or Share My Personal Information" page or use the following link: [www.forward-solutions.com](http://www.forward-solutions.com)

**17. Data Protection Impact Assessments**



We conduct data protection impact assessments for processing activities that are likely to result in a high risk to individuals' rights and freedoms. These assessments help us identify and minimize data protection risks.

#### **18. Children's Privacy**

We do not knowingly collect or process personal data from children under the age of 13 without parental consent. If we learn that we have collected personal data from a child under 13, we will take steps to delete the information as soon as possible. For residents of states with higher age thresholds for children's privacy protections, we will obtain parental consent as required by applicable law.

#### **19. SMS Messaging Privacy Policy**

This Messaging Privacy Policy explains how Forward-Solutions collects and uses information about you in relation to its text message program (the "Messaging Service"). We use SimpleVoIP to provide the Messaging Service to you. For the purposes of the Messaging Service, SimpleVoIP acts as our service provider and data processor of your information.

#### **Collection of Information**

We collect various information on our behalf from and about you, including information you directly provide when you use the Messaging Service. For example, we collect the phone number you provided when signing up for the Messaging Service. When you send messages via the Messaging Service, we will also collect your messaging history and any information included in those messages.

#### **Use of Information**

We use your information to deliver, analyze, maintain and support the Messaging Service. We may also use your information to enhance the Messaging Service features and customize and personalize your experiences on the Messaging Service.

#### **Sharing of Information**

We may share, transfer, or disclose your information, if you consent to us doing so, as well as in the following circumstances:

#### **Service Providers**

We may share your information with third parties to help us provide the Messaging Service to you.

#### **Legal Requirement and Protection of SimpleVoIP and Others.**

We may disclose your information as we believe such disclosure is necessary or appropriate to: (i) comply with applicable law and legal processes; (ii) respond to requests from public and government authorities, including public and government authorities outside your country of residence; (iii) enforce a contract with us; (iv) protect our rights, privacy, safety, or property, and/or that of our affiliates, you or others; and (v) allow us to pursue available remedies or limit the damages that we may sustain.

All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.



We will not share your opt-in to an SMS campaign with any third party for purposes unrelated to providing you with the services of that campaign. We may share your Personal Data, including your SMS opt-in or consent status, with third parties that help us provide our messaging services, including but not limited to platform providers, phone companies, and any other vendors who assist us in the delivery of text messages.

### **Protection of Information**

We take a variety of physical, technical, administrative, and organizational security measures based on the sensitivity of the information we collect to protect your information against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access. Unfortunately, no online activity can be guaranteed to be 100% secure. While we strive to protect your information against unauthorized use or disclosure, we cannot ensure or warrant the security of any information you provide. We do not accept liability for unintentional disclosure.

### **Retention of Information**

We retain your information for as long as you participate in the Messaging Service or as needed to comply with applicable legal obligations. We will also retain and use your information as necessary to resolve disputes, protect us and our customers, and enforce our agreements.

### **Choices and Controls**

Consent to receive automated text messages is not a condition of any purchase. You can opt-out of receiving further commercial text messages via the Messaging Service by responding to any of our text messages with any of the following replies: STOP, or OPTOUT. For additional opt-out information, please review our Terms.

### **Customer Care**

If you are experiencing any problems with the Messaging Service, please email ([DataGovernance@forward-solutions.com](mailto:DataGovernance@forward-solutions.com)).

By signing up to receive text messages from us, you also agree to our main Privacy Policy.

## **20. Cross-Border Data Transfers**

We may transfer your personal data to countries outside your jurisdiction. When we do so, we ensure appropriate safeguards are in place to protect your data, such as:

- Standard Contractual Clauses approved by relevant data protection authorities
- Binding Corporate Rules for transfers within our corporate group
- Compliance with approved codes of conduct or certification mechanisms

## **21. EEA Data Subjects: Your Rights Under the EU GDPR.**

Right to Be Informed	The right to know or be notified about the collection and use of your personal information.
Right to Access	The right to be provided with a copy of your personal information (the right of access)
Right to Rectification	The right to require us to correct any mistakes in your personal information
Right to be Forgotten	The right to require us to delete your personal information in certain situations
Right to Restriction of Processing	The right to require us to restrict processing of your personal information in certain circumstances, e.g., if you contest the accuracy of the data
Right to Data Portability	The right to receive the personal information you provided to us, in a structured, commonly used, and machine-readable format and/or transmit that data to a third party in certain situations
Right to Object	The right to object: <ul style="list-style-type: none"><li>• At any time to your personal information being processed for direct marketing (including profiling)</li><li>• In certain other situations to our continued processing of your personal information, e.g., processing carried out for the purpose of our legitimate interests</li></ul>
Right Not to be Subject to Automated Individual Decision-Making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, see the guidance from the UK Information Commissioner's Office (ICO) on individual rights under the EU General Data Protection Regulation.

**22. How to Exercise Your Rights.** If you would like to exercise any of your rights as described in this Privacy Policy, you can do so here using the webform at [www.forward-solutions.com](http://www.forward-solutions.com) or you may email us at [Marketing@Forward-Solutions](mailto:Marketing@Forward-Solutions).

- Please note that you may only make a CCPA/CPRA-related data access or data portability disclosure request twice within a 12-month period.
- If you choose to contact us directly by email, you will need to provide us with:

- o Enough information to identify you (e.g., your full name, address and customer or matter reference number)
  - o Proof of your identity and address (e.g., a copy of your driving license or passport and a recent utility or credit card bill) –and–
  - o A description of what right you want to exercise and the information to which your request relates
- We are not obligated to make a data access or data portability disclosure if we cannot verify that the person making the request is the person about whom we collected information or is someone authorized to act on such person's behalf.
  - Any personal information we collect from you to verify your identity in connection with your request will be used solely for the purposes of verification.

**23. EEA Data Subjects: Where Your Personal Information is Held.** Information may be held at our offices and those of our group of companies, third party agencies, service providers, representatives and agents as described above (see above: "Who We Share Your Personal Information with").

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal information when this occurs, see below: "Transferring Your Personal Information Out of the EEA."

**24. EEA Data Subjects: Transferring Your Personal Information Out of the EEA.** To deliver services to you, it is sometimes necessary for us to share your personal information outside the European Economic Area (EEA), e.g.:

- With our offices outside the EEA
- With your and our service providers located outside the EEA
- If you are based outside the EEA –or–
- Where there is an international dimension to the products and/services we are providing to you

These transfers are subject to special rules under European and UK data protection law. The United States, where such personal information may be transferred, does not have the same data protection laws as the United Kingdom and EEA. We will, however, ensure the transfer complies with data protection law and all personal information will be secure. Our standard practice is to use standard data protection contract clauses that have been approved by the European Commission.

If you would like further information, please contact us (see "How To Contact Us" below).

**25. Keeping Your Personal Information Secure.** We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorized way. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

**26. EEA Data Subjects: How to File a GDPR Complaint.** We hope that we can resolve any query or concern you raise about our use of your information.



The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in the European Union (or European Economic Area) state where you work, normally live, or where any alleged infringement of data protection laws occurred.

**27. Changes to This Privacy Notice.** This privacy notice was published on [04/06/26] and last updated on [04/04/26].

We may change this privacy notice from time to time—when we do, We will notify you of any material changes by posting the updated Privacy Policy on our website and updating the effective date..

**27. How to Contact Us** Please contact us by mail, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

Forward-Solutions  
Marketing@Forward-Solutions.com  
73 Cedar Ave  
Hershey, PA 17033

**28. Do You Need Extra Help?** If you would like this notice in another format (for example: audio, large print, braille) please contact us (see "How to contact us" above).

Last modified: April 9,2026