

## Privacy Policy

*Effective Date: March 24, 2025*

swaef.com, owned and operated by Beriffa Group (“swaef.com,” “we,” “us,” “our”), takes privacy seriously. In order for our websites (including swaef.com and any other sites we own or operate) (referred to collectively as our “Site”), mobile application (our “App”), and service to function properly, we need to collect some of your information. This Privacy Policy explains the information we collect about you, how we use it and share it, and your privacy rights in connection with visiting our Site, using our App, purchasing products from us, and/or by use of any of our services (collectively, our “Service”).

By using our Service, you acknowledge that you have accepted this Policy without exception. If you do not consent to this Policy, then you should immediately discontinue use of the Service without providing us any personal information.

### What’s Covered by this Policy

This Policy covers information we may learn about you from use of our Service.

This Policy does not cover, and we are not responsible for, third-party websites or applications that may be linked from our Service or that may otherwise display content through our Service; linking to them or otherwise displaying content from third parties does not imply an endorsement. We are neither responsible for these websites or applications nor any information they may collect. You should always review the privacy policy of any third-party website or application before providing any personal information on those websites or applications.

### Personal Information We Collect

When you use our Service, we may collect the following categories of your personal information:

- **Identifiers:** Your name, mailing address, email address, account username and password, address, gender, birthdate and age, and phone number.
- **Financial and Transaction Information:** Shipping and billing information, credit or debit card information or other payment means, and records of your purchases from us, any returns you make, and products you are considering purchasing from us (e.g., items in your cart).
- **User-submitted Content:** Survey responses, if you choose to respond to our surveys.
- **Professional and Employment Information:** If you apply for a job with us, we collect your resume, employment and education history, certifications, skills, and pay/wage rates.
- **Audio Information:** Voicemail recordings if you call us and leave a voice mail. We also use technology to transcribe voicemails to text.
- **Device Information:** Information about the device you use to access our Service, including unique device ID, IP address, geolocation information, persistent identifiers, the hardware model, browser type, and operating system and version.
- **Internet or Other Electronic Network Activity:** Information about your use of our Service, such as access times, pages viewed (including in what order and for how long), and the referring link through which you access our Site.

- **Social Media:** If you choose to interact with us through a third-party social network (such as Instagram), we may collect personal information from your profile on the social network, like your username and any other personal information you make publicly available. Please be aware that any information you submit or post to a social network, such as Instagram, is done at your own risk and without any expectation of privacy. We cannot control the actions of social network users and are not responsible for any content or submissions contained on such sites.
- **Inferences:** We also draw inferences from the information above that may reflect your preferences and characteristics.
- **Sensitive Information:** Some of the information we collect above may qualify as “sensitive personal information.” In particular, credit or debit card information and other payment means are considered “sensitive personal information” in some locations. We use authorized third-party payment processors to process this information and we do not have direct access to such information. We and our authorized payment processors only collect and use this information to provide our Service to you, to ensure the security and integrity of the payment process and our systems, and to detect, prevent, and investigate security incidents and other malicious, deceptive, fraudulent, or illegal actions.

The sources from which we may collect personal information are directly from you, from your device and browser, from Social Networks (if you interact with us through such sites), and from service providers and third parties that assist us in providing, maintaining, and operating our Service and marketing (including customer support, web hosting, web development, data management, payment processing, product fulfillment, security, fraud control, events and promotional services, and analytics services).

You are not required to provide all personal information identified in this Policy to use our Service, but certain functionality will not be available if you do not provide certain personal information. For example, we may not be able to respond to your requests, create an account for you, or allow you to complete a purchase if you do not provide certain personal information to us.

## Cookies

A cookie is a small string of information that a website that you visit transfers to your browser for identification purposes. Cookies can be used to follow your activity while using a website or across websites, and that information helps companies understand your preferences and tendencies, as well as improve and personalize your website experience. Some cookies are necessary to operate a website, while others can be functional, analytical, or used for targeted advertising.

We use cookies and similar technologies to collect information about you when you interact with our Service, including information about your browsing behavior. We use this information to analyze trends, administer our Service, tailor and deliver advertising that may be more relevant or interesting to you, and engage users who have searched for, viewed, and/or purchased our products or similar products.

The cookies and other technologies we use are generally divided into the following categories:

- **Strictly Necessary:** These cookies are necessary for our Site to function and cannot be switched off in our systems. They are usually set in response to actions made by you which amount to a request for services, such as setting your cookie privacy preferences or filling in forms. You can set your browser to block or alert you to these cookies, but doing so means some parts of our Site may not function.

- **Functional:** These cookies enable our Site to provide enhanced functionality and personalization. They may be set by us or by third-party providers whose services we have added to our Site. Some third-party providers (e.g., social media companies) may allow you to log in to their services or share our content with your friends and networks. Please note that your use of a third-party's services is subject to that provider's own privacy policy. If you do not allow functional cookies in your browser, then some or all of the services (including third-party services) we have added to the Site may not function properly.
- **Performance:** These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our Site. They may be set by us or by third-party providers to help us see how visitors navigate our Site. The information these cookies collect is generally aggregated. If you do not allow these cookies in your browser, we will not be able to monitor our Site's performance as effectively.
- **Targeting:** Targeting cookies on our Site may be used by third-party ad partners to build a profile of your interests and show you relevant ads on other websites. These cookies do not directly store your contact information, like name and address, but are based on uniquely identifying your browser and device. If you do not allow these cookies, we and our ad partners will not be able to serve you targeted ads. Additionally, in certain jurisdictions, the use of targeting cookies for advertising could be considered the sale of your personal information. Toggling off targeting cookies opts you out of this sale.

To update your cookie preferences, please click the Cookie Policy option at the bottom of our Site.

#### **Do Not Track**

At this time, we do not recognize the "Do Not Track" browser-based standard signal; however, we recognize the Global Privacy Control ("GPC") as a valid request from you to opt out of performance and targeting cookies.

#### **Uses of Personal Information**

We may use your personal information to:

- Develop, provide, and improve our Service, including to facilitate and improve your online shopping experience;
- Complete the transactions you request, provide products and services requested by you or reasonably anticipated within the context of our relationship with you, and perform our contractual obligations;
- Process your orders, payments, and account adjustments and initiate, render, bill, and collect payment for our Service;
- Create and maintain your account;
- Send you notifications related to your account, purchases, exchanges, and returns;
- Respond to your requests and any other communications from you, including to provide customer service;

- Communicate with you about our Service, offers, promotions, and events, and provide other information we believe may be of interest to you;
- Conduct marketing and promotional efforts, tailor certain advertisements that we or our partners think may be of interest to you, and determine the popularity of certain content and advertisements;
- Personalize your online experience and provide content or features that may be more relevant or interesting to you;
- Evaluate your eligibility for employment;
- Monitor and analyze trends, usage, and activities;
- Conduct internal research and development and make business decisions about current and future Service offerings;
- Detect security incidents and protect against malicious, deceptive, or illegal activity, including fraudulent transactions, error, negligence, and breach of contract;
- Protect our rights, property, or safety, and that of our users, customers, employees, third parties, or the public;
- Comply with and enforce applicable legal and regulatory obligations, and respond to government requests;
- Enforce this Policy, our Terms of Service, or our other policies and agreements;
- Defend against or pursue claims, disputes, or litigation in court or elsewhere; or
- Carry out certain short-term activities and other reasonable internal purposes related to our Service, especially with respect to products you purchase from us or your ongoing relationship with us.

These uses of your personal information are processed according to the following bases:

- As necessary to fulfill our responsibilities under a contract with you (e.g., processing payments for and providing the products you have ordered);
- As necessary for our legitimate interests (e.g., our interest in providing a relevant and secure Service, improving our Service, and maintaining our books and records);
- As necessary to comply with our legal obligations (e.g., notifying you as required by law in the event of a breach regarding the security of your personal information); or
- As is consistent with your consent, where you have provided consent as appropriate (e.g., marketing communications).

**Automated Processing:** We do not use automated processing to make decisions that may affect you significantly. However, we use profiling and analytics to understand how people use the Site and for marketing purposes. These analytics help us understand and improve the Service. We also use security and fraud analytics, for example, to identify potential fraud.

**Sharing Personal Information**

We share your information with the following categories of third parties:

- Our group companies, including our parents, subsidiaries, and affiliates.
- Service providers that we hire or work with that perform services on our behalf, including customer support, web hosting, web development, data management, payment processing, product fulfillment, security, fraud control, marketing, events and promotional services, and analytics services.
- Advertising partners and social networks, to provide you with marketing and ads that we or our partners think may be of interest to you.
- Auditors, advisors, and financial institutions, including auditors, notaries, business continuity support service providers, and legal, tax, and risk and compliance advisers.
- With third parties in connection with a change to the control or financial status of the company, including a corporate restructuring, sale, acquisition, financing, reorganization, bankruptcy, receivership, transfer, assignment of assets, or business merger or divestiture. Personal information and other information may be shared in the diligence process with counterparties and others assisting with the transaction and transferred to a successor affiliates part of that transaction.
- Government bodies, dispute resolution organizations, law enforcement agencies, or third parties in connection with responding to a subpoena, search warrant, or other lawful request for information that we receive; cooperating in law enforcement, internal, or similar investigation; or otherwise protecting our rights.

#### How We Protect Your Personal Information

We maintain reasonable technical and organizational measures to protect personal information from loss, misuse, alteration, or unintentional destruction. We have implemented various security measures to protect both the personal information and the general information that we receive from you through the Service. Whenever you give out personal information online there is a risk that third parties may intercept and use that information. Although we seek to protect your personal information and privacy, we cannot guarantee the security of any information you disclose online. To the extent permitted under applicable law, we assume no liability or responsibility for disclosure of your information due to errors in transmission, unauthorized access by third parties, or other causes beyond our control.

You play an important role in keeping your information secure. You should not share your username or password with anyone. If you have reason to believe that your account is no longer secure, please contact us immediately at the contact information below in the Contact Us section.

#### How Long We Keep Your Personal Information

We will retain personal information as long as necessary to fulfill the purposes for which it was collected; as needed to address tax, corporate compliance, employment, litigation, and other legal rights and obligations; and as otherwise permitted by law.

#### How You Are Notified if this Policy Changes

We may change this Policy from time to time, and any updates or modifications will be posted on our Site and App. In some cases, we may provide you with additional notice (such as adding a statement to our

homepage, sending you an email notification, or other communication method we deem reasonable). We encourage you to read this Policy carefully to stay informed about our personal information practices and the choices available to you.

#### **Communicating with You Electronically**

By using our Service, you agree that we can communicate with you electronically. This includes any required notifications (i.e., legal, technical, regulatory, security, or privacy) relating to your use of our Service.

#### **Children Under 13**

We do not, in providing the Service, knowingly collect personal information from children under 13. If you have reason to believe that a child has provided personal information to us via the Service, please contact us as described in the Contact Us section below, and we will take steps to remove the personal information from our storage systems and terminate the account if we determine that a child under 13 has used the Service.

#### **Service Location**

The Service is operated from the United States. If you are located outside the United States and choose to use the Service or provide information to us, you acknowledge and understand that your information will be transferred, processed, and stored in the United States. United States privacy laws may vary from those in your jurisdiction. Where required by applicable law, we provide appropriate protections for cross-border transfers for international data transfers.

#### **Your Privacy Choices**

If you no longer want to receive our newsletter or other marketing communications, you may unsubscribe at any time by following the unsubscribe options in the communication itself or by opting out in your user account or at checkout. You may also contact us at the contact details in the Contact Us section.

To opt-out of text messages, reply STOP to any mobile message from swaef.com.

Please note that you cannot unsubscribe from certain correspondence from us, including messages relating directly to your account.

#### **Information for California Consumers**

This section describes how we collect, use, process, and disclose personal information of California consumers and the rights you may have under California law. These disclosures are intended to supplement this Privacy Policy with information required by California law.

To understand what personal information we may have collected about you, and from where we collected it, please see the section Personal Information We Collect.

We collect this personal information to operate, manage, and maintain our business, to provide our products and services, and to accomplish our business purposes and objectives, as further described in the section Uses of Personal Information.

In the past 12 months, we may have disclosed the following categories of personal information for business or commercial purposes to the categories of recipients listed below:

- **Identifiers:** Our group companies; Service providers; Auditors, advisors, and financial institutions; Government bodies, dispute resolution organizations, law enforcement agencies, or third parties.
- **Financial and Transaction Information:** Our group companies; Service providers; Auditors, advisors, and financial institutions; Government bodies, dispute resolution organizations, law enforcement agencies, or third parties.
- **User-submitted Content:** Our group companies; Service providers.
- **Professional and Employment Information:** Our group companies; Service providers; Auditors, advisors, and financial institutions; Government bodies, dispute resolution organizations, law enforcement agencies, or third parties.
- **Audio Information:** Our group companies; Service providers; Government bodies, dispute resolution organizations, law enforcement agencies, or third parties.
- **Device Information:** Our group companies; Service providers; Advertising partners and social networks; Government bodies, dispute resolution organizations, law enforcement agencies, or third parties.
- **Internet or Other Electronic Network Activity:** Our group companies; Service providers; Advertising partners and social networks; Government bodies, dispute resolution organizations, law enforcement agencies, or third parties.
- **Social Media:** Our group companies; Service providers; Advertising partners and social networks; Government bodies, dispute resolution organizations, law enforcement agencies, or third parties.
- **Inferences:** Our group companies; Service providers; Advertising partners and social networks; Government bodies, dispute resolution organizations, law enforcement agencies, or third parties.
- **Sensitive Information:** Our group companies; Service providers; Auditors, advisors, and financial institutions; Government bodies, dispute resolution organizations, law enforcement agencies, or third parties.

For more information on how your information is shared, please see the Sharing Personal Information section.

#### **Sale of Personal Information**

We do not “sell” personal information as the term is traditionally understood. However, our use of some cookies and similar technologies may be considered a “sale” under California law. California law defines “sale” broadly to include any disclosure of information in return for any value. The value does not need to be monetary like in a traditional sale. The disclosure of personal information to advertising partners and social networks through cookies and similar technologies may qualify as a sale under California law. You can opt out of these cookies and similar technologies by clicking the “Do Not Sell or Share My Personal Information” link at the bottom of the page.

The categories of personal information disclosed that may be considered a “sale” under California law are: Device Information, Internet or Other Electronic Network Activity, Social Media, and Inferences.

The categories of third parties to whom personal information was disclosed that may be considered a “sale” under California law are: advertising partners and social media networks.



Please note, we do not sell the personal information of individuals under the age of 16 if we have actual knowledge of the individual's age.

### **Your Rights**

Under California law, you have a right to notice, upon collection, of the categories of personal information collected and the purposes for which the information will be used. In addition, California residents may have additional rights, subject to certain limitations, including:

- **Access:** You may have the right to access a copy of the categories and specific pieces of personal information that we have collected, used, and/or disclosed.
- **Correction:** You may have the right to request that we correct inaccurate personal information that we hold about you, taking into account the nature of the personal information and the purposes of the processing of the personal information.
- **Deletion:** You may have the right to request that we delete or anonymize your personal information, with certain exceptions.
- **Sale/Sharing Opt-Out:** You may also have the right to opt-out of the sale of your personal information.
- **No Retaliation:** You have the right to be free from discrimination for exercising your rights.

As noted above, you may exercise your right to opt out of "sales" by clicking the "Do Not Sell or Share My Personal Information" link at the bottom of the page. We also recognize the Global Privacy Control as a valid request from you to opt out of the sale of your personal information.

If you wish to exercise any of these other rights or have any questions regarding the processing of your personal information, contact us as provided in the Contact Us section below.

Please note that before we will be able to process your request, we will need to properly verify your identity for security purposes. Where we possess appropriate information about you on file (e.g., name, phone number, email, or physical address), we will attempt to verify your identity using that information.

To use an authorized agent to make a request on your behalf, we require the authorized agent to provide proof that you gave the agent signed permission to submit the request. We may also require you to verify your identity directly with us or directly confirm with us that you provided the authorized agent permission to submit the request.

### **Information for Residents of Canada**

This section contains additional information for residents of Canada. If you wish to request access to or correction of your personal information, request to opt-out of the processing of your personal information, or request that we delete your personal information, you may contact us at the information as provided in the Contact Us section below. You may also contact us for information about how foreign-based service providers process your personal information or if you have any questions or complaints about the manner in which we treat your personal information.

### **Information for Residents of the European Union (EU) and United Kingdom (UK)**

This section provides additional information for residents of the EU and UK.



As available and except as limited under applicable law, individuals in the EU and UK have the rights described below:

- **Access:** You have the right to request a copy of the personal information we are processing about you, which we will provide to you in electronic form.
- **Rectification:** You have the right to require that any incomplete or inaccurate personal information that we process about you is amended.
- **Deletion:** You have the right to request that we delete personal information that we process about you, unless, for example, we are required to retain such information to comply with a legal obligation or to establish, exercise, or defend a legal claim.
- **Restriction:** You have the right to request that we restrict our processing of your personal information where: (i) you believe such data to be inaccurate; (ii) our processing is unlawful; or (iii) we no longer need to process such data for a particular purpose, but where we are not able to delete the data due to a legal or other obligation or because you do not want us to delete it.
- **Portability:** You have the right to request that we transmit the personal information we hold with respect to you to another data controller.
- **Objection:** Where the legal justification for our processing of your personal information is our legitimate interest, you have the right to object to such processing on grounds relating to your situation. We will abide by your request unless we have compelling legitimate grounds for the processing which override your interests and rights, or if we need to continue to process the data to establish, exercise, or defend a legal claim.
- **Withdrawing Consent:** If you have consented to our processing of your personal information, you have the right to withdraw your consent at any time, free of charge. Please note that if you withdraw your consent, this will not affect the lawfulness of our use and processing of your information based on your consent before the point in time when you withdraw your consent or processing of other information based on other legal bases.

Some rights may be limited, and we may need to retain certain personal information, as required or permitted by applicable law. To inquire about or exercise the rights listed above, at any time, contact us at the contact details in the Contact Us section below. We will respond to your request consistent with applicable law.

If you feel that your request or concern was not satisfactorily resolved by us, you have the right to lodge a complaint with your local data protection authority.

#### **Information for Residents of Brazil**

This section provides additional information for residents of Brazil.

As available and except as limited under applicable law, individuals in Brazil have the rights to request:

- Confirmation of processing of personal information;
- Access to your personal information;
- Correction of incomplete, inaccurate, or outdated personal information;

- Anonymization, blocking, or deletion of unnecessary, excessive data;
- Personal information portability to another service provider or product, upon express request;
- Deletion of personal information processed with your consent;
- Obtaining information about the entities with which swaef.com has shared your personal information;
- Information on the possibility of you not providing consent, as well as being informed about the consequences should you not give consent;
- Revocation of consent.

Some rights may be limited, and we may need to retention certain personal information, as required or permitted by applicable law. To inquire about or exercise the rights listed above, at any time, contact us at the details provided in the Contact Us section below. We will respond to your request consistent with applicable law.

#### Information for Residents of Australia and New Zealand

If you are a resident of Australia or New Zealand, you have the right to access the personal information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access or update/correct your personal information, contact us as provided in the Contact Us section below. We will respond to your request consistent with applicable law.

If you have any questions or wish to lodge a complaint, you may do so by contacting us at the information in the Contact Us section below. If you submit a complaint, we will investigate your complaint and determine the steps that we will take to resolve it. We will contact you if we need any additional information from you and will notify you of the outcome of the investigation.

#### Information for Residents of the People's Republic of China

This section provides additional information for residents of the People's Republic of China.

#### International Data Transfer

As a US company, most of our operations are conducted in the United States and in order to provide the Service, personal information may be processed in the United States, where laws regarding processing of personal information may be less stringent than the laws in your country. By using the Service, you consent to the transfer of personal information outside of the People's Republic of China.

#### Your Rights

To the extent required under applicable law, residents of the People's Republic of China have the right of:

- **Information:** You have the right to request an explanation for how we process your personal information. We describe how we process personal information in this Privacy Policy.
- **Access:** You have the right to request a copy of the personal information we are processing about you, which we will provide to you in electronic form.
- **Rectification:** You have the right to require that any incomplete or inaccurate personal information that we process about you is amended.

- **Deletion:** Subject to some exceptions and in certain circumstances, you have the right to request that we delete personal information that we process about you.
- **Restriction:** You have the right to request that we limit or cease our processing of your personal information, unless laws or administrative regulations stipulate otherwise.
- **Portability:** You have the right to request that we transmit the personal information we hold with respect to you to another personal information processor.
- **Withdrawing Consent:** If you have consented to our processing of your personal information, you have the right to withdraw your consent at any time. Please note that if you withdraw your consent, this will not affect the lawfulness of our processing of your information on the basis of your consent before the point in time when you withdraw your consent, nor will it affect the processing of personal information conducted in reliance on lawful processing grounds other than consent.

Some rights may be limited, and we may need to retain certain personal information, as required or permitted by applicable law. To inquire about or exercise the rights listed above contact us as provided in the Contact Us section below. We will respond to your request consistent with applicable law.

If you feel that your request or concern was not satisfactorily resolved by us, you have the right to lodge a complaint.

#### Contact Us

If you have any questions about this Policy, want to exercise a privacy right with respect to your personal information, or have a privacy-related complaint, you can contact us at [privacy@swaef.com](mailto:privacy@swaef.com) or +4571744060 Please note, these are monitored for privacy-related requests only, and should not be used in connection with other inquiries.