

PRIVACY AND COOKIES POLICY

N.F. Smith & Associates L.P. (“Smith”, “we” or “our”) recognizes your need for privacy protection on the internet and has implemented this Privacy Policy to demonstrate our commitment to fair information practices and the protection of privacy.

What types of information do we collect?

We invite you to explore www.smithweb.com (the “Site”). There is no need to for you to tell us who you are or reveal any information about yourself. However, certain information such as unique identifiers tied to your browser, IP address, domain service, type of computer and type of web browser is automatically collected. No personal information is obtained; rather just the patterns of usage may be tracked and monitored.

When you set up an account with us, you provide us with your name, email address and maybe even payment information. This information is also collected.

We also use “cookies” to customize content specific to your interests and personalize your website experience, such as recognizing you by name when you return. We do not use cookies to track or collect personal identification information from you. By using our Site, you agree that we can place cookies and other similar technology on your device. For more information about the cookies we use, see “More on Cookies”.

In order for you to access certain premium services offered on the Site, you may be required to provide personal information about you. For example, we request personal information when you register to receive additional information regarding our products and services, request a quotation, send us a question, participate in surveys, sweepstakes or other promotional activities, subscribe to newsletters, promotional materials, apply for a job, or contact us. We may also receive information about you from other sources and add it to our account information for you (i.e., credit history information from credit bureaus to prevent fraud and offer certain credit services to our customer).

Additional information if you are located in the European Union

(EU): Our privacy practices are aligned with the requirements of the General Data Protection

Regulation (GDPR). We would like to invite you to give us your consent to continue providing you with relevant information by e-mail.

You have the following rights in relation to your personal data:

- The right to be informed on how your personal data will be used;
- The right of access to personal data to know what is held and how it is used;
- The right to correct inaccurate or incomplete personal data
- The right to delete or remove personal data unless an exception applies. For example, we may need to keep your personal data to comply with a legal obligation
- The right to block or restrict the processing of your personal data in certain circumstances.
- The right to data portability in certain circumstances. For example, you may request to have your personal data sent to a third party for processing.
- The right to object to processing of your personal data in certain circumstances. For example, you may want to object to direct marketing.
- The right to not be affected by automated decision making and profiling by requiring certain safeguards.

These rights may be limited where we can demonstrate that we have a legal requirement or a legitimate interest. If you would like to exercise any of these rights, please contact us by emailing gdpr@nfsmith.com.

How do we use personal data collected from the Site?

Unless otherwise stated, we may use this information to: (i) communicate directly with you by responding to requests or questions, (ii) improve products and services, technology or communications to you, which may include providing you personalized services, content and ads, (iii) analyze and measure how our services are used – for example analyzing what pages are viewed to optimize site design; (iv) perform services, to enforce conditions of sale, Site terms and/or separate contracts, (v) conduct marketing and promotional activities, (vi) prevent fraud or abuse, and/or (vii) protect the integrity of the Site. If you choose not to give the information we request, you can still visit most of the Site, but you may not be able to access certain options, offers and services. Please note that if you use the Site, you are responsible for

restricting access to your account, your computer, and maintaining the confidentiality of your account and password.

How do we keep personal information confidential and secure?

On our side, we have implemented reasonable security measures at our facilities and on our servers to protect against loss, misuse, or alteration of information collected. Except as otherwise provided in this Privacy and Cookies Policy, we will keep all personal information private and will not share it with third parties, unless such disclosure is necessary to (1) conform with applicable law, government orders, court orders or legal process served on Smithbuy.com; and (2) to protect our rights, the users of the Site or the public. This includes exchanging information with other companies and organizations for fraud and credit risk protection. As we continue to develop our business, we might sell or buy business units, which may require the transfer of customer information as business assets. Other than as set out above, you will receive notice when information about you might go to a third parties and you will have an opportunity to choose not to share the information. If you have any questions about the security on our website, you can send an email to privacy@nfsmith.com.

How do you correct / update personal information?

You can always review and update your information by signing into your account. If you do not have an account and your personal information has changed, please email us at privacy-update@nfsmith.com. If you wish to opt out of specific email communications from us or request an overall opt out of both mail and email communications (with exception of account status and related issues) email us at privacy-remove@nfsmith.com.

How long do we keep your personal information?

User information on our server or in our archives is kept for as long as necessary, in accordance with our general data retention policy or as required by law, whichever is longer. In some cases, information posted may stay in the public domain indefinitely.

More on cookies...

The table below lists the cookies we collect and what information they store. By using the Site you agree that we can place cookies on your device. If you want to remove existing cookies

from your device or block future cookies, you can do so by using your browser option. Please note that deleting or blocking cookies can impact your user experience on the Site as certain portions of the site may no longer work. If you have any questions, please submit your request through privacy@nfsmith.com.

Cookie Name	Cookie Description
FORM_KEY	Stores randomly generated key used to prevent forged requests.
PHPSESSID	Your session ID on the server.
GUEST-VIEW	Allows guests to view and edit their orders.
PERSISTENT_SHOPPING_CART	A link to information about your cart and viewing history, if you have asked for this.
STF	Information on products you have emailed to friends.
STORE	The store view or language you have selected.
USER_ALLOWED_SAVE_COOKIE	Indicates whether a customer allowed to use cookies.
MAGE-CACHE-SESSID	Facilitates caching of content on the browser to make pages load faster.
MAGE-CACHE-STORAGE	Facilitates caching of content on the browser to make pages load faster.
MAGE-CACHE-STORAGE-SECTION-INVALIDATION	Facilitates caching of content on the browser to make pages load faster.
MAGE-CACHE-TIMEOUT	Facilitates caching of content on the browser to make pages load faster.
SECTION-DATA-IDS	Facilitates caching of content on the browser to make pages load faster.
PRIVATE_CONTENT_VERSION	Facilitates caching of content on the browser to

Cookie Name	Cookie Description
	make pages load faster.
X-MAGENTO-VARY	Facilitates caching of content on the server to make pages load faster.
MAGE-TRANSLATION-FILE-VERSION	Facilitates translation of content to other languages.
MAGE-TRANSLATION-STORAGE	Facilitates translation of content to other languages.

What about third party websites and services?

The Site may contain links to other websites. Please check such third party websites for their terms of use, privacy and cookies statement before using such third party site and/or program. We are not responsible for the privacy policies or the content of such websites. We may also make chat rooms, forums, message boards, and news group available to you. Any information that is disclosed in these areas becomes public information. We have no control over its use and you should exercise caution when deciding to disclose your personal information.

As you browse the Site, advertising cookies will be placed on your computer so that we can understand what you are interested in. Our display advertising partner, [AdRoll](#), then enables us to present you with retargeting advertising on other sites based on your previous interaction with the Site. The techniques our partners employ do not collect personal information such as your name, email address, postal address or telephone number. You can visit [this page](#) to opt out of AdRoll and their partners' targeted advertising.

Disclaimer

THIS SITE AND ITS CONTENT ARE PROVIDED "AS IS" AND WE EXCLUDE TO THE FULLEST EXTENT PERMITTED BY APPLICABLE LAW ANY WARRANTY, EXPRESS OR IMPLIED, INCLUDING WITHOUT LIMITATION, ANY IMPLIED WARRANTIES OF MERCHANTABILITY OR FITNESS FOR PARTICULAR PURPOSE.

Except as otherwise required by law, neither Smith nor its directors, employees, content providers, affiliates or other representatives will be liable for damages of any kind (including,

without limitation, lost profits, direct, indirect, compensatory, consequential, exemplary, special, incidental or punitive damages) arising out of your use of or your inability to use the Site or the contents of the Site whether or not Smith has been advised of the possibility of such damages.

We use reasonable efforts to ensure the accuracy, correctness and reliability of the contents on the Site, but make no representations or warranties as to the accuracy, correctness or reliability.

Updates and changes

From time to time, we may need to add to, change, update or modify the Privacy and Cookies Policy. These changes will be effective upon posting on the Site without prior notice to or consent from you. If changes are material, however, a more prominent notice will be made on our Site. If you have any questions about our privacy policy and practices, please email us at privacy@nfsmith.com or write to us at the following address:

Smith

Attention: Legal Department – Privacy

5306 Hollister

Houston, Texas 77040

Consent

By using the Site, you agree to both the Privacy and Cookies Policy.

Eff. 5/25/2018