

GUTTERIDGE US E-COMMERCE PRIVACY NOTICE

Effective Date: 22 June 2026

This Privacy Notice applies to personal information that Newbridge LLC (hereinafter, “**Newbridge**”) collects, uses, shares or otherwise processes that identifies, relates to, describes or can be associated with individuals in connection with the following customer facing operations in the United States related to:

- purchasing goods online;
- interacting with the customer care;
- marketing e-mail or e-mail lists or customer loyalty program;
- www.gutteridge.com (hereinafter, the “**Website**”) including any virtual assistant tools, chatbot or similar functionality available on our website.

This Privacy Notice provides you details about the personal information Newbridge collects, uses, shares or otherwise processes, the purposes for which Newbridge uses that personal information, to whom and for what purposes Newbridge may disclose that personal information, how we protect that personal information, the rights and choices you have with respect to that personal information, and how you can reach Newbridge to get answers to your questions.

The Website is not directed to children under 13 years of age, and Newbridge does not knowingly collect personal information from children under 13, in compliance with the Children's Online Privacy Protection Act (COPPA). We also do not intentionally process the data of minors under 13 without verifiable parental consent. If we learn we have inadvertently collected such information, we will delete it promptly. If a user or their parent or legal guardian believes Newbridge collected any personal information of a minor, please contact Newbridge at dpo@caprigrup.eu for removal of that data.

This Privacy Notice may be amended, revised, or otherwise updated from time to time at our sole discretion and without prior notice. Accordingly, you are encouraged to review this Privacy Notice periodically, paying particular attention to the effective date indicated at the beginning of this document, in order to remain informed of any modifications.

In the event that we implement changes to this Privacy Notice that materially affect the manner in which Newbridge collects, uses, discloses, or otherwise processes your personal information, or that materially diminish your rights in relation thereto, Newbridge will provide advance notice of such changes by appropriate means, including, where applicable, email communication, push notifications, or the publication of a prominent notice on the Website.

Unless otherwise required by applicable law, your continued access to or use of the Services following the effective date of any such amendments shall constitute your acknowledgment of, and agreement to be bound by, the revised Notice. Should you disagree with any provision of this Notice, as amended from time to time, you must immediately cease accessing and using the Services.

1. Categories of personal information that Newbridge collects

In connection with the Website, Newbridge collects the following categories of personal information to provide the online service and process customers’ orders:

- identifiers: first name, last name, email address, telephone number, date of birth, postal/shipping address, ZIP code, and billing address;
- commercial information: purchasing habits at Gutteridge, tastes and preferences, payment ID, and the last four digits of the credit card (processed securely by our payment providers);
- internet or other electronic network activity: IP addresses, domain names, URI (Uniform Resource Identifier) addresses, time of requests, and overall browsing behaviour on our Website;
- geolocation data: general location derived from your IP address or ZIP code;

- inferences: profiles reflecting your preferences, characteristics, and shopping tendencies, used for marketing and behavioural targeting;

hereinafter, collectively defined as “**Personal Information**”.

2. Purposes of processing Personal Information

Newbridge uses customers’ Personal Information for a variety of business and commercial purposes, to the extent permitted by law, including as described below:

- i. provision of services. Newbridge processes personal information as necessary to provide, administer, maintain, and improve the services requested by users, including the management of user accounts, access credentials, customer relationships, transactions, and any related support activities;
- ii. compliance with legal and regulatory obligations. Newbridge may process personal information where such processing is necessary to comply with applicable legal, regulatory, tax, accounting, reporting, compliance, or governmental requirements. This includes processing activities undertaken to satisfy statutory obligations, manage legal and regulatory risk, respond to lawful requests from competent authorities, and otherwise conduct business in accordance with applicable laws. Where such processing is required by law, Newbridge may be unable to provide certain services without the relevant personal information;
- iii. enforcement of terms, policies, and legal rights. Newbridge may process personal information to monitor, investigate, prevent, detect, and address actual, suspected, or potential violations of its Terms of Conditions of sales, contractual arrangements, internal policies, or applicable laws and regulations. Such processing may also be necessary to establish, exercise, defend, or enforce legal claims, rights, obligations, and agreements involving users, business partners, service providers, or other third parties;
- iv. fraud prevention and security protection. Newbridge may process personal information to safeguard the integrity, security, and reliability of its services, systems, and infrastructure. This includes activities aimed at preventing, detecting, investigating, and mitigating fraud, unauthorized access, identity misuse, cybersecurity threats, malicious activities, spam, malware, and other conduct that may compromise the security of users, Newbridge, or third parties;
- v. customer support and communications. Newbridge processes information provided by users when contacting customer support or otherwise communicating with Newbridge. Such processing is necessary to respond to inquiries, provide assistance, resolve issues, investigate complaints, and ensure the proper operation and enjoyment of the services;
- vi. marketing and promotional communications. Subject to applicable law and, where required, the user's consent, Newbridge may process contact information, including email addresses, telephone numbers, and other electronic contact details voluntarily provided by users, for the purpose of sending promotional, commercial, marketing, or informational communications relating to Newbridge’s products, services, events, or business activities. Users may withdraw their consent or opt out of receiving such communications at any time by following the instructions included in the relevant communication or by contacting Newbridge directly.
- vii. research, analytics, and service improvement. Newbridge may process personal information to conduct research, analytics, testing, auditing, and performance evaluations relating to the Services. Such processing enables Newbridge to better understand user interactions, improve functionality and user experience, develop new products and services, measure effectiveness, and support business decision-making processes.
- viii. personalization of user experience. Newbridge may process personal information to customize and personalize users' interactions with the Services, including recognizing returning users, maintaining preferences, facilitating continuity across devices and platforms, delivering tailored content and functionality, and optimizing the overall user experience.

- ix. corporate transactions. Personal information may be processed, disclosed, transferred, or otherwise used in connection with any actual or proposed merger, acquisition, financing transaction, reorganization, restructuring, sale of assets, bankruptcy proceeding, due diligence process, or other corporate transaction involving Newbridge, subject to applicable confidentiality and legal requirements.
- x. processing based on consent or user instructions. Newbridge may process personal information for any additional purpose disclosed to the user at the time the information is collected, where the user has provided consent, given instructions, or where such processing is otherwise necessary to provide requested Services or closely related functionalities.
- xi. aggregated and de-identified information. Newbridge may aggregate, anonymize, pseudonymize, or otherwise de-identify personal information so that it can no longer reasonably be used to identify an individual. Subject to applicable law, Newbridge may use, analyse, disclose, share, and commercialize such aggregated or de-identified information for any legitimate business purpose without further notice or restriction.

3. Sharing, "Sale", and "Sharing" for Targeted Advertising

We share your data with:

- service providers (e.g., payment processors like Klarna, hosting platforms, and logistics partners) who help us operate our business. Under the privacy laws of certain US states (such as California), our use of third-party cookies and tracking technologies for cross-context behavioural advertising may be considered a "**Sale**" or "**Sharing**" of personal information;
- advertising networks (such as Meta, Google, TikTok, Criteo, and RTB House) for these targeted advertising purposes;
- auditors, consultants, lawyers, and other entities who use the data to provide us with professional services,
- government agencies, law enforcement, regulators, and courts where Newbridge is required to comply with applicable laws, regulations or rules, requests of law enforcement, regulators and other government agencies or a legally binding process, such as pursuant to subpoenas, court orders, to enforce our legal rights, or to protect you, Newbridge, or others against injury or harm.

Newbridge discloses personal information to service providers and contractors subject to written contracts that restrict their use of Personal Information. Newbridge may also anonymize, aggregate or otherwise strip any Personal Information collects of all personally identifying characteristics and may use or share that aggregated, anonymized data with third parties for any purpose Newbridge deems appropriate. Newbridge maintains and uses this information only in a de-identified fashion and will not attempt to re-identify such information, except as permitted by law.

4. US State Privacy Rights

You may exercise certain rights regarding your Personal Information. In particular, to the extent permitted by applicable law, you have:

- A. the right to access Personal Information: the right to know.** You have the right to request that we confirm whether or not we are processing your Personal Information. You also have the right to access such Personal Information;
- B. the right to correct inaccurate Personal Information.** You have the right to request that we correct any inaccurate Personal Information we maintain about you;
- C. the right to request the deletion of your Personal Information.** You have the right to request that we delete any of your Personal Information;

- D. the right to obtain a copy of your Personal Information.** Newbridge will provide your Personal Information in a portable and usable format that allows you to transfer data easily to another entity – provided that this is technically feasible;
- E. the right to opt out from the Sale of your Personal Information;** Newbridge will not discriminate against you for exercising your privacy rights.
- F. the right to non-discrimination.**

5. Additional rights for Users residing in California

In addition to the rights listed above common to all users in the United States, as a user residing in California, you have

- A. the right to opt out of the sharing of your personal information** for cross-context behavioural advertising;
- B. the right to request to limit our use or disclosure of your sensitive personal information** to only that which is necessary to perform the services or provide the goods, as is reasonably expected by an average consumer. Please note that certain exceptions outlined in the law may apply, such as, when the collection and processing of sensitive personal information is necessary to verify or maintain the quality or safety of our service.

6. Additional rights for Users residing in Virginia, Colorado, Connecticut, Texas, Oregon and Montana

In addition to the rights listed above common to all Users in the United States, as a User residing in Virginia, Colorado, Connecticut, Texas and Oregon, you have

- A. the right to opt out of** the processing of your personal information for **Targeted Advertising or profiling** in furtherance of decisions that produce legal or similarly significant effects concerning you;
- B. the right to freely give, deny or withdraw your consent for the processing of your Sensitive Personal Information.**

Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of sensitive personal information is necessary for the provision of a product or service specifically requested by the consumer.

7. Additional rights for users residing in Utah

In addition to the rights listed above common to all Users in the United States, as a User residing in Utah, you have:

- A. the right to opt out of** the processing of your Personal Information for **Targeted Advertising;**
 - B. the right to opt out of the processing of your sensitive personal information.** Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of sensitive personal information is necessary for the provision of a product or service specifically requested by the consumer.
- 8. How to exercise your privacy rights under US state laws**

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document.

For us to respond to your request, Newbridge must know who you are. Newbridge will not respond to any request if Newbridge is unable to verify your identity and therefore confirm the Personal Information in its possession relates to you. You are not required to create an account with us to submit your request. Newbridge

will use any Personal Information collected from you in connection with the verification of your request solely for verification and shall not further disclose the Personal Information, retain it longer than necessary for purposes of verification, or use it for unrelated purposes. If you are an adult, you can make a request on behalf of a child under your parental authority.

9. How to exercise your rights to opt out

In addition to what is stated above, to exercise your right to opt-out of Sale or Sharing and Targeted Advertising you can also use the privacy choices link provided on www.gutteridge.com. If you want to submit requests to opt out of Sale or Sharing and Targeted Advertising activities via a user-enabled **global privacy control**, such as for example the Global Privacy Control (“[GPC](#)”), you are free to do so and we will abide by such request in a frictionless manner.

10. How and when Newbridge expects to handle your request

The Data Subjects may exercise the rights referred to in this paragraph by sending an e-mail to the Data Protection Officer (dpo@caprigrroup.eu). Newbridge will respond to your request without undue delay, but in all cases within the timeframe required by applicable law. Should Newbridge needs more time, Newbridge will explain to you the reasons why, and how much more time Newbridge needs.

Should Newbridge denies your request, Newbridge will explain to you the reasons behind our denial (where envisaged by applicable law you may then contact the relevant authority to submit a complaint).

Newbridge does not charge a fee to process or respond to your request unless such request is manifestly unfounded or excessive and in all other cases where it is permitted by the applicable law. In such cases, Newbridge may charge a reasonable fee or refuse to act on the request. In either case, Newbridge will communicate our choices and explain the reasons behind them.

11. How long Newbridge keep the Personal Information

Newbridge retains personal information only for as long as is necessary to fulfil the purposes described in this Privacy Notice, including the provision of Services, compliance with legal and regulatory obligations, resolution of disputes, enforcement of contractual arrangements, and the protection of Newbridge’s legitimate business interests.

Where required by applicable law, regulation, court order, or governmental authority, Newbridge may retain personal information for longer periods to satisfy legal, accounting, tax, reporting, compliance, or record-keeping requirements.

If you communicate with Newbridge, including through email, customer support channels, contact forms, or other correspondence, Newbridge may retain records of such communications and related information associated with your account. These records may be maintained for purposes including customer support, service administration, quality assurance, dispute resolution, fraud prevention, security monitoring, compliance verification, and the enforcement of applicable agreements, policies, and legal rights. Such records may be deleted, anonymized, or otherwise disposed of when retention is no longer necessary and where permitted by applicable law.

Newbridge may also retain information relating to the use of its Services, websites, applications, and platforms for analytical, operational, security, and service improvement purposes. Usage data is generally retained for a limited period unless a longer retention period is required to enhance security, investigate incidents, prevent fraud, comply with legal obligations, establish or defend legal claims, or improve the functionality, integrity, and performance of the Services.

Newbridge will take reasonable steps to delete, anonymize, or otherwise irreversibly de-identify personal information when it is no longer required for the purposes for which it was collected, and when retention is no longer necessary to satisfy legal, regulatory, contractual, operational, or legitimate business requirements.

If you request the deletion of your account or object to the continued processing of your personal information, Newbridge will evaluate such request in accordance with applicable law. Notwithstanding any such request, Newbridge may retain and continue to process certain personal information to the extent necessary to comply with legal obligations, exercise or defend legal claims, resolve disputes, enforce agreements, prevent fraud or abuse, maintain security, and protect the rights, property, and interests of Newbridge, its users, and third parties.