

	Effective Date: May 25, 2018	Last Revision Date: January 1, 2020
	Approved By: General Counsel	
	Page 1 of 16	
Title: PRIVACY POLICY		

Horizon Global Corporation and its subsidiary companies (collectively, “Horizon,” “we,” “our,” or “us”) recognizes the importance of data privacy and are firmly committed to protecting your privacy when visiting websites owned and operated by Horizon (hereinafter referred to as “Horizon Websites”). This Privacy Policy (this “Policy”) describes how Horizon collects, uses, discloses and protects Personal Information, and how you can exercise your privacy rights.

- [About this Policy](#)
- [What types of Personal Information does Horizon collect and how do we collect it?](#)
- [How does Horizon use the Personal Information it collects?](#)
- [What happens if you refuse to provide Personal Information?](#)
- [Who is collecting Personal Information and is it shared with anyone?](#)
- [Is my Personal Information secure?](#)
- [Does Horizon retain Personal Information?](#)
- [California Privacy Notice](#)
- [Note to Non-U.S. visitors](#)

About this Policy

As used in this Policy, “Personal Information” refers to any information that identifies or can be used to personally identify an individual. This may include, but is not limited to, first and last name, postal address, e-mail address, phone number (“personally identifiable information”) as well as other non-personally identifiable information or demographic information such as your date of birth, age, gender, habits or preferences when such information is tied to your personally identifiable information

This Policy only pertains to the collection of Personal Information through Horizon Websites but does not apply to information that may be collected offline. This Policy does not apply to websites maintained by other companies or organizations to which we link, including social media websites such as Facebook, Twitter, LinkedIn, and YouTube, or that are not otherwise a part of the Horizon family of websites (collectively, “Third Party Sites”). We encourage you to read the privacy policy of Third-Party Sites before submitting Personal Information to that site. Horizon is not responsible and disclaims any liability for the independent practices or content of any Third-Party Sites.

Horizon reserves the right to make changes to this Policy at any time and from time to time. The most recent version of the Policy is reflected by the last revision date located at the top of this Policy. All updates and amendments are effective immediately upon notice, which we may give by any means, including, but not limited to, by posting a revised version of this Policy or other notice on Horizon Websites. We encourage you to review this Policy often to stay informed of changes that may affect you. Our electronically or otherwise properly stored copies of this Policy are each deemed to be the true, complete, valid, authentic, and enforceable copy of the version of this Policy that was in effect on each respective date you visited the

	Effective Date: May 25, 2018	Last Revision Date: January 1, 2020
	Approved By: General Counsel	
	Page 2 of 16	
Title: PRIVACY POLICY		

Horizon Website. By using or otherwise accessing a Horizon Website, you are accepting the practices described in this Policy.

This Policy may contain hyperlinks to websites that are not operated by Horizon. These hyperlinks are provided for your reference and convenience and are not an endorsement of the activities of these third-party websites or any association with their operators. We do not control these websites and are not responsible for their data or privacy practices. We urge you to review any privacy policy posted on any website you visit before using the website or providing any Personal Information.

What types of Personal Information does Horizon collect and how do we collect it?

Personal Information We Collect from You

Horizon does not ask you to provide any information to browse a Horizon Website, though some information may be automatically collected about you through cookies or other tracking technologies. However, if you wish to participate in some features and services, we may ask you to provide certain personal and/or demographic information.

We may collect the following information:

- Name
- Postal address (including zip code)
- Phone number
- Email address
- Credit or Debit card information (if you make a purchase)
- Product information, including purchase date, part number, part name, UPC, installed by information, purchase type, product discovery, top reasons for choice
- Retailer information, including retailer name, address, and phone number.

Your information is collected through one of the many online forms available on the Horizon Website and will usually take the form of:

- registration or sign-up;
- sign up for a newsletter that is specific to an event, product, or website and that is not included under general website registration;
- sweepstakes, contests, or other promotions;
- surveys and polls;

	Effective Date: May 25, 2018	Last Revision Date: January 1, 2020
	Approved By: General Counsel	
	Page 3 of 16	
Title: PRIVACY POLICY		

- message boards and other interactive activities;
- purchasing a Horizon product through our online shopping system;
- e-cards, tell-a-friend, or other one-time use features;
- feedback, questions, or comments through one of our “Contact” or “Ask the Expert” forms;
- information submitted in a business capacity (e.g., resumes, media requests, etc.); and
- any other request that requires the submission of Personal Information (e.g., Consumer Panel, Product Request, “Where to Buy,” etc.)

Please note that depending on the Horizon Website that you are visiting, some or many of the activities listed above may be unavailable.

The types and amount of information collected for the features listed above will vary depending on the activity. For some activities, you may be asked to create a username and/or password and/or to provide additional, demographic information, including:

- your age or date of birth
- gender
- frequency of use, purchase, and consumption of certain Horizon products and/or other similar products
- facts about your business
- other information relevant to the Horizon product you have purchased or the specific website which you are visiting.

If demographic information is collected for an activity that also requires Personal Information, we may combine the demographic information with your Personal Information. Combining data allows us to customize notices we send you and content we provide according to your interests and preferences.

As discussed below, certain information may be passively and automatically collected and stored about how you interact with a Horizon Website, including, Metric ID, Session ID, date accessed, Referring URL, IP address, and browser type.

Information Collected from Party Cookies and Tracking Technologies

Horizon utilizes cookies to improve the use and functionality of our websites. A “cookie” is a small file or record-keeping device that websites often store on a user’s computer to recognize you as a repeat user of a website, track your use of the website, and target advertising. We may use cookies to store preferences, record session information, develop information about visitors’ preferences and interests, record past activity on a Horizon Website in order to provide better service, or customize web page content based on

	Effective Date: May 25, 2018	Last Revision Date: January 1, 2020
	Approved By: General Counsel	
	Page 4 of 16	
Title: PRIVACY POLICY		

information you voluntarily provide. You can disable cookies using your internet browser settings. Please refer to your internet browser’s help function for information on how to disable cookies.

IP Addresses

An Internet Protocol (“IP”) Address is a number that is used by computers on the network to identify your computer every time you log on to the Internet. We may keep track of IP addresses, browser types, Metric ID, Session ID, and other information about how you interact with the Horizon Website to (among other things): (i) troubleshoot technical concerns, (ii) maintain website safety and security, (iii) restrict access to Horizon Websites to certain users, and (iv) better understand how Horizon Websites are utilized.

Log Files

Horizon, or an outside company, agent, or contractor on our behalf (collectively, “Vendor”), may collect information in the form of logs, which are files that record website activity and gather statistics about a user’s browsing habits. These entries are generated anonymously, and help us gather (among other things) (i) a user’s browser type and operating system, (ii) information about a user’s session, such as the URL they came from, the date and time they visited a Horizon Website, and which pages they have viewed and for how long , and (iii) other similar navigational or click-stream data. We also use information captured in log files for internal marketing and demographic studies, so we can constantly improve and customize online services we provide you. Log files are only used internally and are not associated with any specific user.

Web Beacons

We may use web beacons (or clear GIFs) on Horizon Websites or include them in e-mail messages we send you. Web beacons, also known as “web bugs,” are small strings of code that provide a method of delivering a graphic image on a web page or in an email message for the purpose of transferring data back to us. The information collected via web beacons may include some of the information described in the IP Address section directly above, as well as information about how a user responds to an email campaign from Horizon (e.g., the time the email is opened, where does the user link to from the email, etc.). We use web beacon information for a variety of purposes, including but not limited to, site traffic reporting, unique visitor counts, advertising and email auditing and reporting, and personalization.

Horizon strives to provide you choices regarding the information you provide to us and the Personal Information we otherwise collect about you. Below are ways in which you have control over your information. We do not control third parties’ collection or use of your Personal Information to serve interest-based advertising. However, these third parties may provide you with options to not have your information collected or used in this way.

Third-party analytics services, including Google Analytics and Google Tag manager, both provided by



Effective Date:
May 25, 2018

Last Revision Date:
January 1, 2020

Approved By:
General Counsel

Page 5 of 16

Title: PRIVACY POLICY

Google Inc. (“Google”) and Twitter Pixel use cookies and similar technologies to analyze how visitors use our online services and for compiling statistical reports. If you do not want your data collected with Google Analytics, you can install the Google Analytics opt-out browser add-on. This add-on instructs the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) running on websites to prohibit sending information to Google Analytics. To opt-out of analytics for the web, visit the Google Analytics opt-out page and install the add-on for your browser. For more details on installing and uninstalling the add-on, please see the relevant help resources for your specific browser.

Most browsers allow you to change your cookie settings. The “Options” or “Preferences” menu of most browsers detail how to prevent your browser from accepting new cookies, how to receive notification when you receive a new cookie, and how to disable cookies. Your browser’s settings may also allow you to disable or delete similar technologies and data used by browser add-ons by changing the add-on settings or clearing browser storage. Browser manufacturers provide help pages relating to cookie management in their products. Please see below for more browser manufacture information:

- Google Chrome
- Internet Explorer
- Mozilla Firefox
- Safari (Desktop)
- Safari (Mobile)
- Android Browser
- Opera
- Opera Mobile
- Cloudflare

For browsers not listed above, please see the relevant help resources for your specific browser. If you would like to only limit third party advertising cookies, you can turn off most of these cookies by visiting the following links (but be aware that not all of the companies listed on these sites drop cookies via our Website):

- [Your Online Choices](#)
- [Network Advertising Initiative](#)
- [Digital Advertising Alliance](#)

For Google Analytics, you can opt-out through Google Ads Settings, Ad Settings for mobile apps, or any other available means (e.g. the Network Advertising Initiative consumer opt-out listed above). Google also provides a Google Analytics opt-out plug-in for the web. Please note that even if you opt-out and limit cookies or these third-party tracking technologies, they may still collect data and you may still see advertisements, but they will not be targeted based on information collected through these technologies.

	Effective Date: May 25, 2018	Last Revision Date: January 1, 2020
	Approved By: General Counsel	
	Page 6 of 16	
Title: PRIVACY POLICY		

How does Horizon use the Personal Information it collects?

All Personal Information collected is used for the purpose for which it was collected or as otherwise identified at the point of collection or in this Policy. For example, if you sign up or register on a Horizon Website (“general website registration”), the information you provide is used to offer you the benefits and privileges typically associated with registration. This may include access to and use of exclusive or personalized content or activities on the Horizon Websites (e.g., message boards, upload features, personalized recipe boxes, etc.), participation in special events and promotions (contests, sweepstakes, coupons, etc.), and the ability to receive communications or marketing material you select at the time of registration or that automatically come with your registration. Similarly, if you contact us via an online contact form or through one of our “Ask the Expert” features, your Personal Information is used to respond to your inquiry or comment, and in some instances, post the answers to your question in anonymous form on the relevant Horizon Website. Any credit card information you provide is used to fulfill and process your online purchases.

When registering or providing Personal Information on a Horizon Website, you may also be provided the option to have your information used for an activity or service different from the primary activity or service that you are requesting. For example, if you are signing up for a contest or other promotion, you may also be able to sign up for newsletters or alerts from the Horizon Website hosting the promotion or from other Horizon Websites or products. If you choose to receive these additional services, Horizon will use your Personal Information to provide them to you.

Newsletters and Email

If you provide us your email address and/or mailing address (whether as part of our general website registration or for a specific newsletter or communication), the contact information will be used to send you the requested newsletter, communication, or literature. In addition, you may receive communications introducing you to other Horizon brands, websites, services, as well as updates on developments in our industry which may be of interest to you. These materials may come in the form of regular mail or email, depending on the Horizon Website you register on and the Personal Information you provide during registration.

We may also use your email address to send transactional or administrative communications (e.g., confirmation email when you purchase a product online or when you sign up for, or unsubscribe from, a specific registration or activity), as well as certain service-related announcements (e.g., notices about updates to this Policy, discontinued features or programs on Horizon Websites, changes to our online services or technical support policies, or other related changes). Collectively, these types of communications are referred to in this Policy as “Administrative Communications.”

	Effective Date: May 25, 2018	Last Revision Date: January 1, 2020
	Approved By: General Counsel	
	Page 7 of 16	
Title: PRIVACY POLICY		

Sweepstakes, contests, and promotions

To enter an online sweepstakes, contest, or other promotion (collectively, “Promotions”), you may be required to register on a Horizon Website. The Personal Information collected as part of a Promotion is used to determine your eligibility, notify you whether you are a winner, and/or fulfill and deliver prizes. If you are a winner, certain information about you (such as your name and picture) may be posted to the Horizon Website. For more information about Promotions, please see the official rules or details corresponding to the Promotion.

Message boards and other interactive features

We may provide interactive features that allow you to post or publish messages, stories or pictures on Horizon Websites. Although we strive to protect those who use and participate in these activities, we encourage you to be wary of posting Personal Information or images about yourself in public areas such as on a message board or other online community features. This Personal Information can be collected and used by people you do not know. As such, we cannot guarantee the security and privacy of, and are not responsible for, any Personal Information you post in these areas. Your use of these features is at your own risk. Please note that if we choose to post a picture or message that you provide us through one of these features, we may post, along with the picture or message, certain non-personal information about you, such as your username, first name, first initial of your last name, and/or city and state of residence.

Purchasing Horizon products online

Some of Horizon Websites may allow you to purchase Horizon products through an online shopping system operated by Horizon or by a Vendor on our behalf, while certain products may only be available through third-party retailers. Horizon provides links to unaffiliated third-party sites that sell Horizon products. If you are purchasing a product through the Horizon online shopping system, you will be asked to provide your credit card information, including credit card number, billing and shipping addresses, as well as other basic contact information (e.g., phone, email address). This information is used to fulfill your purchase and confirm your order.

If the online store you are visiting is operated by an unaffiliated third party, we may provide you a direct link to the third-party store for your convenience. Please note, however, that these websites are not operated by Horizon and are not covered by this Policy. We encourage you to read the privacy policy of the online store you are visiting before sharing any Personal Information such as your credit card number.

E-cards, tell-a-friend, and other one-time use features

Personal information requested for an e-card, tell-a-friend or other referral feature, or other one-time use features (typically, names and email addresses) is used on a one-time basis (e.g., to send the communication)

	Effective Date: May 25, 2018	Last Revision Date: January 1, 2020
	Approved By: General Counsel	
	Page 8 of 16	
Title: PRIVACY POLICY		

and is not retained by Horizon. If these kinds of features are made available to children under 13, they may be designed so that prior parental consent is not required.

Business-related information

Please be advised that in some areas of Horizon Websites, you may be able to submit information about yourself or the company you represent in a business capacity. These areas may include a career section where you can submit a resume or job application online or a section or contact form to handle media requests. Any Personal Information gathered in this context is used exclusively for its intended purpose (e.g., a resume will be used for the job application process only), such information is not otherwise subject to the terms of this Policy.

What happens if you refuse to provide Personal Information?

If you choose not to submit Personal Information when requested, you may be unable to participate in certain activities and personalized features on Horizon Websites and may limit the services and special offers we can provide you. For example, if you refuse to share your email address, you will be unable to receive Horizon newsletters or otherwise register on Horizon Websites. If you refuse to provide your credit card number, you will be unable to purchase products.

Who is collecting your Personal Information and is it shared with anyone?

Personal Information that you disclose on Horizon Websites is collected by Horizon or by a Vendor acting on its behalf; and is used in accordance with this Policy.

We may disclose your Personal Information to third parties as follows:

1. within Horizon’s group of companies for the purposes described in this Policy;
2. to third parties who supply services to us and who help us and our group of companies to operate our business.
3. to our legal and other professional advisers;
4. as necessary in order to comply with a legal requirement, for the administration of justice, to protect vital interests, to protect the security or integrity of our databases or a Horizon Website, to take precautions against legal liability; and
5. to regulatory authorities, courts and governmental agencies to comply with legal orders, legal or regulatory requirements and government requests.

The following provides more specific information about how and to whom we may disclose your Personal Information.

	Effective Date: May 25, 2018	Last Revision Date: January 1, 2020
	Approved By: General Counsel	
	Page 9 of 16	
Title: PRIVACY POLICY		

Agents and Contractors

Horizon may use Vendors to provide support for the internal operations of Horizon Websites and to assist with administering the Horizon online shopping system or various programs and promotions available on Horizon Websites. In doing so, these Vendors may come into contact with your Personal Information. However, we only give them access to (or allow them to collect on our behalf) the Personal Information they need in order to perform the specific tasks they have been hired to do. The Vendors have also agreed to protect the confidentiality and security of this Personal Information.

Partners and Joint Promotions

From time to time, we may run a joint or co-sponsored program or promotion on Horizon Websites with another company, organization, or other reputable third party; and, as part of this event, collect and process Personal Information. If your Personal Information is collected by or shared with a third-party company as part of such promotion, we will inform you at the time your Personal Information is collected. Periodically, we may run a promotion on a Horizon Website that features products or services of another company and will provide you with the opportunity to opt-in to receive information directly from that third-party company. When conducting a promotion involving a third-party company, we may provide a separate link to that company’s privacy policy. We encourage you to read it before you share any personal information, as we cannot guarantee they adhere to the same privacy practices. If you do not wish that your Personal Information not be collected or shared with a third-party company, you can choose not to opt-in or participate in these events at the time the Personal Information is collected or requested.

Is my Personal Information secure?

Horizon takes appropriate and reasonable technical and physical security measures designed to protect Personal Information which is transmitted, stored or otherwise processed by us, from unlawful destruction, loss, alteration, misuse, unauthorized disclosure or access. These measures include computer safeguards and secured files and facilities. Our service providers are carefully selected and required to use appropriate protective measures. In certain areas, Horizon uses industry-standard SSL-encryption to protect data transmissions. Most current internet browsers support the level of security needed to use these areas.

Specifically, we endeavor to implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk, including as appropriate: (a) pseudonymization (such as where data is separated from direct identifiers so that linkage to an identity is not possible without additional information that is held separately) and encryption, (b) ensuring the ongoing confidentiality, integrity, availability and resilience of systems and services used to process your Personal Information, (c) ensuring the ability to restore the availability and access to Personal Information in a timely manner in the event of a physical or technical incident; and (d) ensuring a process for regularly testing, assessing and evaluating the effectiveness of technical and organizational security measures.

	Effective Date: May 25, 2018	Last Revision Date: January 1, 2020
	Approved By: General Counsel	
	Page 10 of 16	
Title: PRIVACY POLICY		

Does Horizon retain Personal Information?

Horizon maintains your Personal Information for as long as necessary to fulfil the purposes for which it was collected as described above.

General retention

The criteria we use to determine data retention periods for Personal Information includes the following: (i) Retention according to Horizon’s Global Records Management Policy and corresponding schedules; and (ii) Retention in accordance with legal and regulatory requirements.

Employment applicant data

If your application for employment is successful and you employed with Horizon, your Personal Information will be transferred to your personnel file and will be processed for employment purposes. If your application for employment is unsuccessful, we will keep your Personal Information in accordance with our Global Records Management Policy and corresponding schedules for a period of six (6) months upon notification that your application was not successful.

California Privacy Notice

This portion of the Policy applies solely to California consumers (“consumers” or “you”). Horizon has adopted this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. The purpose of this notice is to provide you with a description of our online and offline practices regarding the collection, use, disclosure, and sale of Personal Information and your rights regarding your Personal Information. As used in this notice, any terms defined in the CCPA have the same meaning when used in this notice.

Shine the Light

Pursuant to Section 1798.83-.84 of the California Civil Code, residents of California have the right to request from a business, with whom the California resident has an established business relationship, what types of personal information, if any, the business shares with third parties for direct marketing purposes by such third party and the identities of the third parties with whom the business has shared such information in the immediately preceding calendar year. To access this information, please contact us by emailing dataprivacyrequests@horizonglobal.com with “CA Shine the Light Privacy Requests” in the subject line. Please note that, under the law, we are not required to respond to your request more than once in a calendar year, nor are we required to respond to any requests that are not sent to the above-designated email.

Your right to know about the Personal Information we collect about you

The section above titled, [“What types of Personal Information does Horizon collect and how do we collect it?”](#) lists the categories of Personal Information that we collect and process about you, a description of each

	Effective Date: May 25, 2018	Last Revision Date: January 1, 2020
	Approved By: General Counsel	
	Page 11 of 16	
Title: PRIVACY POLICY		

category, and the source of how we obtain each category.

Your Rights and Choices

Under California law, California residents can exercise three privacy rights: (1) Disclosure and Access; (2) Deletion; and (3) “Do Not Sell My Personal Information,” which are described in more detail below (collectively, “Privacy Rights”). These Privacy Rights are not absolute and are subject to certain exceptions. For example, we cannot disclose or permit access to specific pieces of Personal Information if the disclosure or access would present a certain level of risk to the security of the Personal Information, your account with us, or the security of our systems of networks. If you are a California consumer, we will process your request to exercise your Privacy Rights in accordance with California law.

A record concerning the requests may be maintained pursuant to our legal obligations. Further, we may charge a reasonable fee or refuse a request if such request is excessive, repetitive, or manifestly unfounded.

1. Disclosure and Access Requests

You have the right to request that we disclose to you, for the twelve (12) month period immediately preceding the date of your request to know the following:

Categories of Personal Information Request

- the categories of Personal Information we collected about you
- the categories of sources for the Personal Information we collected about you
- our business or commercial purpose for collecting or selling that Personal Information
- the categories of third parties with whom we share that Personal Information
- if we sold or disclosed your Personal Information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Specific Pieces of Information Request

- the specific pieces of Personal Information we collected about you (also called a data portability request)

When a request disclosure and access request is made, we will first verify your identity to protect your

	Effective Date: May 25, 2018	Last Revision Date: January 1, 2020
	Approved By: General Counsel	
	Page 12 of 16	
Title: PRIVACY POLICY		

privacy and security. For requests to disclose categories of Personal Information collected, we will require that the requestor provide at least two pieces of information to verify the requestor’s identity to a reasonable degree of certainty. For requests to disclose specific pieces of Personal Information collected, we will require the requestor provide: (1) at least three pieces of information to verify the requestor’s identity to a reasonably high degree of certainty and (2) a signed declaration under penalty of perjury that the requestor is the consumer whose Personal Information is the subject of the request. We are required to retain signed declarations as part of our record-keeping obligations for twenty-four (24) months.

Please note that we will never disclose a consumer’s social security number, driver’s license number, or other government-issued identification number, financial account number, any health information or medical identification number, an account password, or security questions and answers in response to a disclosure request.

Additionally, please note that we are only required to fulfill a disclosure request from a consumer twice per every twelve (12) month period. If you submit a request in excess, it may be denied, or you may be charged for fulfilling your request.

2. *Deletion Request Rights*

You have the right to request that we delete any of your Personal Information collected from you and retained, subject to certain exceptions. For requests to delete Personal Information collected, we will require that the requestor provide at least two pieces of information to verify the requestor’s identity to a reasonable degree of certainty. We are required to retain the requests to delete Personal Information for twelve (12) months as part of our record-keeping obligations. If we are unable to verify a request, the request will be treated as a request to opt-out and afforded rights associated with that request right as described in more detail below.

Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies. A deletion request may be denied, in full or in part, if retaining the Personal Information is necessary for us or our service providers to:

- complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you
- detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities
- debug products to identify and repair errors that impair existing intended functionality

	Effective Date: May 25, 2018	Last Revision Date: January 1, 2020
	Approved By: General Counsel	
	Page 13 of 16	
Title: PRIVACY POLICY		

- exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law
- comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.)
- 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 the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent
- enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us
- comply with a legal obligation
- make other internal and lawful uses of that information that are compatible with the context in which you provided it

3. *Exercising Disclosure and Deletion Rights*

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request by:

- Emailing us at dataprivacyrequests@horizonglobal.com

Only make a verifiable consumer request related to your Personal Information. You may also make a verifiable consumer request on behalf of your minor child. You may only make a verifiable consumer request for access or data portability twice within a twelve (12) month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request and, to the extent necessary, to identify the internet browser or device that is the subject of the request.

4. *Do Not Sell My Personal Information Requests*

	Effective Date: May 25, 2018	Last Revision Date: January 1, 2020
	Approved By: General Counsel	
	Page 14 of 16	
Title: PRIVACY POLICY		

You have the right to direct us not to sell your Personal Information to a third party. To request that we do not sell your Personal Information, please email us at dataprivacyrequests@horizonglobal.com.

In addition, you may use the opt-out tool provided by the Digital Advertising Alliance to send requests under the CCPA for your browser to opt-out of the sale of Personal Information by some or all participating companies. To learn more visit <https://youradchoices.com/pmc>.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time, up to ninety (90) days, we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response electronically. Any disclosures we provide will only cover the twelve (12) month period preceding receipt of the verifiable consumer request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data disclosure requests, we will provide your Personal Information in a format that is readily useable and should allow you to transmit the information from one entity to another entity. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will inform you why we made that decision and provide you with a cost estimate before completing your request.

Household Requests

We currently do not collect household data. If all members of a household make a Right to Know or Right to Delete Request, we will respond as if they are individual requests.

Request Made Through Agents

You may designate, in writing or through a power of attorney, an authorized agent to make requests on your behalf. Before accepting such a request from an agent, we will require the agent to provide proof you have authorized it to act on your behalf, verify the agents identity, and we may request that you to verify your identity directly with us. The verification requirement does not apply if the consumer has provided the authorized agent with legal power of attorney under California Probate Code Sections 400 to 4465.

Requests to Opt-In for Minors

If you are sixteen (16) years old or older, you have the right to direct us not to sell your Personal Information at any time. We do not and will not sell Personal Information of consumers that we know are less than sixteen (16) years old unless we received affirmative authorization from the consumer who is between thirteen (13) and sixteen (16) years old, or the parent or guardian of a consumer less than thirteen (13) years old, to opt-in to the sale of their Personal Information. Upon the receipt of this request to opt-in, we will inform the minor of the right to opt-out later and the process for doing so.

	Effective Date: May 25, 2018	Last Revision Date: January 1, 2020
	Approved By: General Counsel	
	Page 15 of 16	
Title: PRIVACY POLICY		

Sale and Disclosure of Personal Information

Under the CCPA, a “sale” means providing to a third-party Personal Information for valuable consideration. It does not necessarily mean money was exchanged for the transfer of Personal Information. We have taken substantial steps to identify whether any of our data sharing arrangements would constitute a “sale” under the CCPA. Due to the complexities and ambiguities in the CCPA, we will continue to evaluate our third-party relationships as we wait for final implementing regulations and guidance.

Based on our understanding of the CCPA at this time, in the preceding twelve (12) months we have not sold any Personal Information to any third parties. In the preceding twelve (12) months, we have disclosed Personal Information to third parties for business purposes including to customer service, technical support, payment processors, information technology, and sales and marketing partners. We will continue to update our business practices as regulatory guidance becomes available and provides clarity on what constitutes a sale transaction.

Non-Discrimination

We will not discriminate against you for exercising any of your rights under the CCPA. Unless permitted by the CCPA, we will not:

- deny you goods or services
- charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties
- provide you a different level or quality of goods or services
- suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services

Legal and Business Transfers

We may also disclose Personal Information if we are required to do so by law, or if in our good faith judgment, such action is reasonably necessary to comply with legal processes, to respond to any claims, or to protect the safety or rights of Horizon, its customers, or the public. In the event of a merger or acquisition of all or part of or Horizon by another company, or in the event that Horizon were to sell or dispose of all or a part of its business, the acquirer would have access to the information maintained by that Horizon business, which could include Personal Information, subject to applicable law. Similarly, Personal Information may be transferred as part of a corporate reorganization, insolvency proceeding, or other similar event, if permitted by and done in accordance with applicable law.

	Effective Date: May 25, 2018	Last Revision Date: January 1, 2020
	Approved By: General Counsel	
	Page 16 of 16	
Title: PRIVACY POLICY		

Note to Non-U.S. Visitors

Due to the global nature of our business, your Personal Information may be stored and transferred to parties located in other countries. Depending on the country in which you reside, you may have the right to correct; update; port; delete; restrict; or object to processing of your Personal Information. Horizon responds to requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection law. We may ask you to verify your identity in order to help us respond efficiently to your request. If you wish to exercise your data protection rights, please e-mail dataprotection@horizonglobal.com

Alternatively, write to:

Attn: Data Protection Notice
Horizon Global Corporation
47912 Halyard Drive
Plymouth, Michigan 48170

For persons in the EU, write to:

Attn: Data Protection Notice
Horizon Global Corporation
Prins Bernhardplein 200
1097 JB Amsterdam

We have appointed a data protection officer for our companies in Germany. Please write to DPO@horizonglobal.com for further information and requests.