

Privacy Policy

Effective Date: 8/25/2025

Strang Corporation and its affiliated brands—**American Bread Company, Sola Salons, Don’s Pomeroy House, and Don’s Lighthouse** (collectively, “**Strang**,” “**we**,” or “**us**”)—are committed to protecting your privacy. This Privacy Policy outlines how we collect, use, and share information when you interact with our websites, apps, social media channels, in-person locations, mobile services, email communications, and other Strang personnel (collectively, our “**Services**”). This policy explains:

- What types of information we collect
- How we use and secure it
- When and with whom we may share information
- Your rights regarding data privacy
- Our use of cookies and tracking technologies

This Privacy Policy applies to information we collect through the Services and anywhere it is linked. It does **not** cover non-Strang websites or services that may link to ours.

Information We Collect

We may collect the following categories of personally identifiable information:

Categories	Purpose	Who We Share With	Retention
Personal Identifier: Name, email, phone, postal address (e.g., for reservations, surveys, contact requests); IP address; Device IDs	Provide, maintain, and improve Services; customer support; notify about changes	Service providers, affiliated entities	As long as needed for purpose, unless otherwise stated

Categories	Purpose	Who We Share With	Retention
Protected Classifications: Age (to comply with minor-related regulations); optional gender (if provided in surveys)	Legal compliance; service improvement	Service providers, affiliates	As long as needed
Commercial Information: Purchase history, transaction details, payment information	Manage Services; support; analytics	Service providers, affiliates	As long as needed
Internet or Network Activity: Browsing history, interaction with websites/apps/email	Service improvement; analytics	Advertising partners, affiliates, service providers	As long as needed
Geolocation Data: General location inferred via IP	Service optimization	Service providers, affiliates	As long as needed
Audio, electronic, visual, thermal, olfactory, or similar information: Video surveillance at physical locations (e.g., security cameras)	Safety, improve customer experience	Security partners, affiliates	As long as necessary to complete the purpose, unless otherwise instructed by consumer, or unless otherwise disclosed at the time of collection.
Employment-related Information:	Hiring process, legal compliance	HR systems, affiliates	As required by law

Categories	Purpose	Who We Share With	Retention
For job applicants: education, work history, references			
Sensitive or Special Categories: Not intentionally collected	N/A	N/A	N/A

We may disclose information to other parties who are not listed here when required by law or to protect our Company or other persons.

How We Secure the Information We Collect

We use a combination of physical, technical, and administrative safeguards to protect the information we collect through the Services. While we use these precautions to safeguard your information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf.

Sharing of Aggregated Data

We may analyze aggregated, de-identified data in accordance with the applicable data protection laws and share these analyses at our discretion, including with marketing agencies, media agencies, and analytics providers. These other companies will not be able to relate this data to identifiable individuals.

Combination of Information

We may combine information from the Services together with other information we obtain from our business records.

Change of Ownership or Corporate Organization

We may transfer to another entity or its affiliates or service providers some or all information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction.

Our Practices Regarding Information Belonging to Children

The Services are intended for users aged 16 and older. Strang does not knowingly collect personal information or personal data from children. If we discover that we have inadvertently collected personal information or personal data from anyone younger than the age of 16, we will delete that information. We do not share or sell any data of any users that we know to be under the age of 16.

Do Not Track

We do not currently recognize automated browser signals regarding tracking mechanisms, which may include “Do Not Track” (DNT) signals sent by web browsers, mobile devices, or other mechanisms. Third parties may be able to collect information, including Personal Information or Personal Data, about your online activities over time and across different websites or online services when you use the Services. You may opt out of online behavioral ads at <http://www.aboutads.info/choices/>. You also may limit certain tracking by disabling cookies in your web browser.

Cookies and Analytics

We use cookies, pixels, tags, and other technologies, which may be provided by third parties, on our Services to enable certain functionality and for security and fraud detection and prevention, as well as to collect usage information about our Website and the emails that we send and to personalize content and provide more relevant ads and information. We may combine the information we collect via these technologies with other information, including Personal Information and Personal Data.

Cookies

Cookies are alphanumeric identifiers that are transferred to your computer through your web browser for record-keeping purposes. Some cookies enable you to log-in to our Services or save certain settings and preferences, while others allow us to track usage and activities on our Services, personalize content, or deliver more relevant ads. Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in the future.

The “Help” tab on the toolbar on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. If you block cookies, however, certain features on our website may not be available or function properly.

Third parties may use cookies and other similar technologies to collect or receive information from our Site and elsewhere on the Internet and use that information to provide you with targeted ads. If you would like to opt-out of such advertising practices on the particular device on which you are accessing this Privacy Policy, please go to <http://optout.aboutads.info/>. The Network Advertising Initiative also offers a means to opt-out of a number of advertising cookies. Please visit <http://www.networkadvertising.org> to learn more. Note that opting-out does not mean you will no longer receive online advertising. It does mean that the company or companies from which you opted-out will no longer deliver ads tailored to your preferences and usage patterns.

Pixel tags and embedded script (aka clear GIFs and web beacons).

Pixel tags are tiny graphics with a unique identifier, similar in function to cookies. In contrast to cookies, which are stored on your computer’s hard drive, pixel tags are embedded invisibly on web pages. We may use these, in connection with our Website to, among other things, track the activities of the users of our Services, improve ads, personalize and manage content, and gather usage information about our Website. We may also use these in HTML emails to help us track email response rates, identify when our emails are viewed, and track whether our emails are forwarded.

Third-Party Analytics Tools.

Our Website uses automated devices and applications operated by third parties, such as Google Analytics, which uses cookies and similar technologies to collect and analyze information about use of the Website and report on activities and trends. This service may also collect information regarding the use of other websites, apps and online resources. You can learn about Google’s practices by going to www.google.com/policies/privacy/partners/, and you can opt out of them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

Your Privacy Rights

Unless otherwise required by applicable law, the following terms shall have the following meaning:

“Personal Data” means any information, including sensitive data and derived data, unique identifiers, or pseudonymous data, that is linked or reasonably linkable to an identified or identifiable individual or household, or data linkable to a device that itself is linkable to an individual, not including deidentified or publicly available information.

“Personal Information” means any information that directly or indirectly identifies, relates to, describes, or is reasonably capable of being associated, linked or linkable with a particular individual or household.

“Process” or **“processing”** means any operation or set of operations performed, whether by manual or automated means, on personal data or on sets of personal data, such as the collection, use, storage, disclosure, analysis, deletion or modification of personal data.

“Targeted advertising” or **“Cross-context behavioral advertising”** means displaying advertisements to a consumer where the advertisement is selected based on personal data obtained from that consumer’s activities over time and across nonaffiliated websites or online applications to predict such consumer’s preferences or interests.

“Sale” means renting, releasing, disclosing, exchange, sharing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s personal information by the business to a third party for monetary or other valuable consideration.

“Profiling” means any form of automated processing of personal information to evaluate certain personal aspects relating to a natural person and in particular to analyze or predict aspects concerning that natural person’s performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location, or movements.

US data protection laws grant California, Colorado, Delaware, Iowa, New Hampshire, New Jersey, Oregon, Texas, Virginia, Utah, and Connecticut residents the following data rights:

Right to Know and to Access

You have the right to request that we disclose certain information to you about our collection and use of your Personal Information and Personal Data over the past 12 months. This information is disclosed in the “Information We Collect” Section of this Privacy Policy.

You also have the right to request access to Personal Information or Personal Data collected about you and information regarding the source of that information, the purposes for which we collect it, and the third parties and service providers with whom we share it. You may submit such a request as described below. To protect our customers’ Personal Information or Personal Data, we are required to verify your identity before we can act on your request.

Right to Portability

You have the right to request that we provide a copy of the Personal Information or Personal Data we have collected about you, in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance. Once we receive your request and confirm your identity, we will provide to you a copy of your data as required under the applicable data protection laws. We may provide this data to you through your user account with us, or via email to the email address you have provided with your request.

Right to Delete

Subject to certain exceptions, you have the right to request that we delete any of your Personal Information or Personal Data. Once we receive your request and confirm your identity, we will review your request to see if an exception allowing us to retain the information applies. We will delete or deidentify Personal Information or Personal Data not subject to one of these exceptions from our records and will direct our service providers to take similar action.

Right to Correct

Subject to certain exceptions, you have the right to request that we correct inaccurate Personal Information or Personal Data that we have collected about you. Once we receive your request and confirm your identity, we will review your request, taking into account the nature of the personal information or data and the purposes of the processing of the personal information or data to see if we can correct the data. We may also request additional information showing that the information you want to correct is inaccurate.

Right to Opt-out

You have the right to opt-out of processing of your Personal Information or Personal Data for the purpose of (i) targeted advertising, (ii) sale of Personal Information or Personal Data, or (iii) profiling to provide you with tailored content, including suggested advertising. We do not process your Personal Information or Personal Data for the purpose of (i) targeted advertising, (ii) sale of Personal Information or Personal Data, or (iii) profiling, as those terms are defined in the applicable laws.

Residents of New Jersey may designate an authorized agent to exercise their right to opt out on their behalf.

Your Rights & Choices

Depending on your jurisdiction, you may have certain rights, including:

- **Right to Know / Access:** See what personal data we hold, its source, uses, and who it's shared with
- **Right to Portability:** Request your data in a machine-readable format
- **Right to Delete:** Have your data erased, subject to legal exceptions
- **Right to Correct:** Update inaccurate information
- **Right to Opt-Out:** Especially for targeted advertising or data sales (where applicable)

We do not currently profile individuals for behavioral advertising, nor sell personal data for monetary gain, unless required by local law.

We will not discriminate against anyone for exercising data rights.

Additional Rights for New Jersey Residents

New Jersey residents may revoke previously given consent to process your personal data in accordance with our data collection practices by emailing us at StrangCorpHR@Strangcorp.com.

Special Information for Delaware, New Jersey, and Utah Residents

Residents of the States of Delaware, New Jersey, and Utah have the right to opt out of the sale of certain pieces of their information to other companies who will sell or license their information to others. Currently, Strang Corporation does not engage in the sale of information.

Residents of New Jersey may designate an authorized agent to exercise their right to opt out on their behalf.

Delaware, and New Jersey Residents

Right to Appeal

If you make a request to exercise any of the above data access rights and we are unable to comply with your request, you may request to appeal our decision. To appeal any data privacy request decision, please contact us by emailing StrangCorpHR@Strangcorp.com with the subject line "Data Access Request Appeal." If after you complete the appeal process with us, you are still not satisfied with our response, you may contact your Attorney General to file a complaint. Below is the contact information for the appropriate entity where you can inquire about filing an appeal:

Delaware residents:

Delaware Department of Justice (Wilmington Office)
Carvel State Building
820 N. French Street
Wilmington, DE 19801
(302) 577-8400

<https://attorneygeneral.delaware.gov/>

Note: The Delaware Department of Justice has two other offices located in Dover and Georgetown (<https://attorneygeneral.delaware.gov/contact/>).

New Jersey residents:

Division of Consumer Affairs in the Department of Law and Public Safety
124 Halsey Street
Newark, NJ 07102
(973) 504-6200

<https://www.njconsumeraffairs.gov/>

How to Submit a Request

To exercise your rights, please contact us via:

- **Email:** StrangCorpHR@Strangcorp.com
- **Phone:** (216)525-2775
- **Mail:** Strang Corporation, Attn: Privacy Inquiries, 8905 Lake Ave #2, Cleveland OH 44102

We may require verification to process your request and may deny requests that do not meet legal requirements.

International Privacy & Legal Notices

Residents of certain U.S. states (e.g., California, Colorado, Virginia, etc.) may have additional privacy protections. Where required, supplemental notices will be provided.

Changes to Our Privacy Policy

We review this policy regularly and may update it when practices change or legal requirements evolve. We will update the “Effective Date” to notate any changes.

Contact Us

For questions or concerns about this Privacy Policy, please reach out via:

Human Resources Department

Strang Corporation

8905 Lake Ave #2, Cleveland OH 44102

Email: StrangCorpHR@Strangcorp.com

Phone: (216)525-2775
