

LEATHERMAN CORPORATION PRIVACY POLICY ("POLICY")

Leatherman Corporation is committed to protecting your privacy. This POLICY explains our data handling practices and procedures.

This policy is a binding agreement between you and Leatherman Corporation and serves as both the POLICY and Terms Of Use, jointly here-in-after ("AGREEMENT"). By accessing any of our websites ("SITES") or use of our product ("PRODUCT"), you are stating that you agree with the terms of this AGREEMENT. This AGREEMENT is subject to change at any time and notice is given by posting a revised version of this AGREEMENT here and all changes will take effect immediately.

We never sell or lease your personally identifiable information.

PUBLIC FORUMS

Leatherman Corporation may participate in social networking sites such as FaceBook or Twitter, etc. Any postings that you submit in a public forum as such is not subject to this AGREEMENT and no privacy should be expected on your part. We hold no liability for information posted in such forums and information collected by third parties may be used to contact you. Please be aware of this and post wisely.

MINORS

Leatherman Corporation and its products and services are not intended for use by minors under the age of thirteen (13) years old. We do not knowingly collect or maintain personally identifiable information from children under 13. If a parent or guardian becomes aware that his or her child has participating in posting on public forums under Leatherman Corporation's control or provided us with data, please contact us with details and we will work to delete this information from our databases.

JOB SEEKERS

Leatherman Corporation may collect personal information that you submit regarding independent sales representative relations, or employees positions. We retain this information for an unspecified amount of time, but we do not release this information to third parties except to appropriate governmental entities and/or our service providers as necessary in connection with recruiting, employment, corporate governance, acquisitions, and legal or regulatory requirements. We require that our service providers maintain confidentiality of your personal information.

INFORMATION COLLECTION AND USE

We collect information pertaining to business i.e. ("INFORMATION") that enables us to respond to your requests for our products and/or services and to send you information about our services. INFORMATION such as, but not limited to, business name, contact

name, e-mail, is requested by various forms on our website or via telephone if you call our offices, etc. and is used so that we may help you with your requests for information, support, etc. In addition, we may collect credit card and related payment information when you order services.

NEWSLETTERS. When you subscribe or sign up to receive newsletters published or offered via the SITES, we will ask you for information necessary to enable us to process your request and to send you information regarding our services.

COOKIES. We may use COOKIES to enhance your user experience, deliver personalized content, and collect information about the use of the SITES. "COOKIES" are small computer files that we transfer to your computer's hard drive. COOKIES allow us to statistically monitor how many people are using the SITES, for what purposes, how often someone visits the SITES, and the length of their stay. This information helps us enhance users viewing experience. We may also use COOKIES to prevent you from having to re-enter your identification and password information each time you visit our SITES. COOKIES are not designed to retrieve personal or business data from your hard drive, your e-mail, or any other personal information. Most browsers are initially set to accept COOKIES, but users can change the setting to refuse COOKIES or to be alerted when COOKIES are being sent. Although refusal of COOKIES will not interfere with the ability to interact with most of the SITES, you will need to accept COOKIES in order to access information and use certain functions. For example, COOKIES are required to be accepted for access to our web-based services or desktop products with online features. The COOKIES are renewed each time a user logs on to one of the SITES that uses COOKIES.

PRODUCT-RELATED INFORMATION COLLECTION. We collect certain additional information in connection with your use of our services or desktop products with online features. For instance:

WEB-BASED SERVICES. In connection with certain of our web-based services we collect certain additional information, including IP address, browser, connection speed, domain, referring URL, and other environment-related information to enable us to provide a secure environment for the use of the services, to pre-populate forms, and calculate aggregate statistical information about the customers using these services.

LEATHERMAN CORPORATION PRODUCTS AND SERVICES. In addition to the uses set forth above, we may use your INFORMATION to: 1) notify you of products and services that we think may be of interest to you; 2) offer you discounts or other promotions with respect to Leatherman Corporation products and services that we think may interest you; and 3) contact you for survey purposes to determine how we can better service you or provide better products to meet your needs.

OTHER LEATHERMAN CORPORATION COMPANY PRODUCTS AND SERVICES. Your INFORMATION may be provided to one or more other Companies if you request services of us that include work to be performed by a third party. By

requesting such services, you agree that Leatherman Corporation will not be held liable if said third party does not abide by this Privacy Policy.

THIRD-PARTY PRODUCTS. We may also use your INFORMATION to inform you of special discounts or offers from other companies we have carefully selected and whose products and services may be of interest to you.

DISCLOSURE OF YOUR INFORMATION

From time to time, we may be required to release INFORMATION: 1) to comply with valid legal requirements such as a law, regulation, search warrant, subpoena, or court order; 2) to enforce or apply the terms of any of our service or license agreements; or 3) in special cases, such as protecting the rights, property, or safety of Leatherman Corporation, our customers, or others. We may also provide INFORMATION to government agencies and to our vendors, suppliers, authorized resellers, and other business, development, and industry partners ("PARTNERS") to enable them to: 1) provide us with products and services to better operate and maintain the SITES; 2) provide you with a product or service requested by you; or 3) enable them to market products or services to you. We also may provide information about you that does not allow you to be identified to, or contacted by, third parties ("AGGREGATE INFORMATION"). For example, we might inform third parties regarding the number of users of the SITES and the activities they conduct while on the SITES. Depending on the circumstances, we may or may not charge for this AGGREGATE INFORMATION. We may also use this AGGREGATE INFORMATION as part of products or services that we provide to third parties and to improve our products, services, and the SITES.

PARTNER AND GOVERNMENT SERVICES. We may engage PARTNERS to perform functions on our behalf, which may include assisting us in processing your INFORMATION. Certain PARTNERS and government agencies may collect INFORMATION (such as business name, address, email address, credit card information, and customer ID) directly from you and use of that information and other information provided by you to third parties is not governed by this policy even though those PARTNERS and government agencies may share such information with us.

BUSINESS TRANSFERS. In the event that all or a portion of Leatherman Corporation or any other Leatherman Corporation related Company (or the assets of one of those entities), is bought or sold, INFORMATION will likely be included among the transferred business assets, but such information remains subject to this POLICY or a POLICY substantially similar to this POLICY.

HOW WE PROTECT YOUR PRIVACY INTERNALLY

We work to keep your INFORMATION as secure as reasonably possible. We combine industry-standard technical safeguards with a code of conduct for those employees who are permitted to access our customers' INFORMATION. We do not store credit card

information.

Many of our web-based services are hosted on servers that are co-located at a third-party facility with whom we have a contract providing for security measures. For example, hosted SERVICES DATA is submitted via SSL encryption and stored on a server equipped with industry standard firewalls.

Hosted data may include personally identifiable information and other information that belongs to our customers' own customers, website visitors, or other users. We will not review, share, distribute, or reference any such CUSTOMER DATA except as provided in the service or license agreement, or as may be required by law. Individual records of CUSTOMER DATA may be viewed or accessed by authorized Leatherman Corporation employees, agents or independent contractors only for the purpose of resolving a problem, support issues, or suspected violation of the service or license agreement, or as may be required by law.

Despite these security measures, we do not represent or warrant that INFORMATION will be protected against loss, misuse, attacks, or alteration by third parties. Customers are responsible for maintaining the security and confidentiality of their usernames and passwords.

YOUR PRIVACY CHOICES

Occasionally, a Leatherman Corporation business unit may send you communications to provide you with information or promotions relating to products and services that may be of interest to you. You may opt out of receiving these communications

LEATHERMAN CORPORATION. Each e-mail we send will contain instructions on how to unsubscribe in the event that you do not wish to receive future promotional e-mails from the Leatherman Corporation business unit that sent you the email promotion. If you choose to opt out of receiving promotional email communications from any Leatherman Corporation business unit, we may still periodically communicate with you via mail and telephone. Please allow 10 business days to be removed from the promotional email list of a Leatherman Corporation business unit.

THIRD-PARTY E-MAIL PROMOTIONS. If you access and/or use any of the other Leatherman Corporation Companies' services or our Partner's services from a link on the SITES, a Leatherman Corporation/Partner co-branded site or by any other means, any information you reveal in connection with such service is submitted to that other Leatherman Corporation Company or to our Partner and is not subject to this POLICY. You should consult the POLICY of any other Leatherman Corporation Company, Partner, or third-party site with respect to its treatment of any information that you may reveal in connection with such service.

CORRECTING OR UPDATING YOUR INFORMATION AND CONTACTING LEATHERMAN CORPORATION

You can always update the INFORMATION that you have provided to us and/or change your preferences with respect to marketing contacts from us by contacting the Leatherman Corporation business unit to which you provided your preferences. Please note that it may take up to 4 weeks to be removed from the Leatherman Corporation business unit's mail lists and 10 days to be removed from e-mail and phone lists.

LINKED SITES

The SITES may contain links to third-party websites and resources (collectively, "LINKED SITES"). These LINKED SITES are provided solely as a convenience to you and not as an endorsement by us of the content on such LINKED SITES. We make no representations or warranties regarding the correctness, accuracy, performance, or quality of any content, software, service, or application found at any LINKED SITE. We are not responsible for the availability of the LINKED SITES or the content or activities of such sites. If you decide to access any LINKED SITE, you do so at your own risk. Your use of any LINKED SITE is subject to the policies, terms of use, and privacy policies of such LINKED SITE, if any.

CONSENT TO TRANSFER

Users located outside the United States who submit INFORMATION to us via the SITES should be aware that the information they submit will be transferred to our servers located in the United States. Your submission of INFORMATION to us constitutes your consent to this transfer. Although we will collect and use your INFORMATION only as stated in this POLICY, laws generally applicable to the protection of personal data in the United States may not be as stringent as those in some users' home jurisdictions.

CHANGES TO THIS POLICY

We may change this POLICY at any time by posting the then current policy to the SITES. Your use of the SITES constitutes acceptance of the provisions of this POLICY and your continued usage after such changes are posted constitutes acceptance of each revised POLICY.

HOW TO CONTACT US

If you have any questions about this AGREEMENT or any of the practices described herein, you may send us an email at: webmaster@leathermancorporation.com.

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