

Privacy Policy

Elettrotek Kabel North America Inc., a subsidiary of EK Group, the owner and operator of www.elettrotekkabel.us (the "Website" or "Site"), is hereafter referred to in this Privacy Policy as "EKNA", "us", "our" or "we".

EKNA respects the privacy of your personal information and, as such, we make every effort to ensure your personal information is protected and remains private.

For purposes of this Privacy Policy, personal information ("Your Information" or "Personal Data") means information about you, which may be of a confidential or sensitive nature and may include personally identifiable information ("PII") and/or financial information. PII means individually identifiable information that would allow us to determine the actual identity of a specific living person, while sensitive data may include other information, comments, content and other information that you voluntarily provide.

We have provided this Privacy Policy to explain how we collect, use, share, store and protect information about the users of our Website and the purchasers of our Products (hereafter referred to as "user", "you" or "your"), including our electrical wire and cable products for special applications (the "Product"). We will not use or share your Personal Data with anyone except as described in this Privacy Policy. This Privacy Policy will inform you about the types of personal data we collect, the purposes for which we use the data, the ways in which the data is handled and your rights with regard to your personal data.

EKNA collects Personal Data about you when you contact us for information or create a purchase order for our Products and ship them to you, (the "Services"). The term Services includes the Website, Products, accessories, services, software and technology available through the Website.

We may change this Privacy Policy from time to time. If we decide to change this Privacy Policy, we will inform you by posting the revised Privacy Policy on the Website. Changes will go into effect on the "Last updated" date shown at the end of this Privacy Policy. By continuing to use the Website or our Services, you consent to the revised Privacy Policy. We encourage you to periodically review the Privacy Policy for the latest information on our privacy practices.

By accessing or using our Website and Services, and purchasing our Products, you consent to the collection, transfer, manipulation, storage, disclosure and other uses of Your Information (collectively, "use of your information") as described in this Privacy Policy and our Terms and Conditions which may be accessed here: www.elettrotekkabel.us/Terms&Conditions.

If you do not now, or no longer, agree with or consent to this privacy policy and our Terms and Conditions you may not access or use our website or Services.

1. Information Provided Directly By You

We collect information you provide directly to us, such as when you email, call or write to us to request information, make a purchase from us, provide shipping information, create or modify a EKNA account, request Services, complete a EKNA form, survey, questionnaire or application, subscribe to a EKNA newsletter, contact customer support,

join or enroll for an event or otherwise communicate with us in any manner. This information may include, without limitation: your name, e-mail address, company name, phone number or any other personal information you choose to provide.

2. Information Collected Through Your Use of Our Services

We collect information about your activity on our services, for instance how you use them (e.g., features you've been using, searches, clicks and pages that have been shown to you, referring webpage addresses, advertising that you click on) and how you interact with us. The following are situations in which you may provide Your Information to us:

- a. When you fill out forms or fields through our Services, including a request for more information on our Website.
- b. When you place an order for a Product from us through our sales representatives or using our Service.
- c. When you provide us with shipping and delivery information.
- d. When you request a refund, exchange or warranty service for a purchase.
- e. When you register for an EKNA account with our Service.
- f. When you provide responses to a survey or questionnaire.
- g. When you join or enroll in an event through our Services.
- h. When you sign up for any newsletters or other materials through our Services.
- i. When you provide information to us through a third-party application, service or website.
- j. When you participate in any of our marketing initiatives including events or promotions.

3. Information Collected Automatically

We may automatically collect information via the Website or through the use of various technologies, including, but not limited to Cookies, Pixel Tags and Web Beacons (explained below). We may collect your IP address, browsing behavior and device IDs. This information is used by us in order to enable us to better understand how our Services are being used by visitors and allows us to administer and customize the Services to improve your overall experience.

4. Information Collected From Other Sources

We may also receive information from other sources and combine that with information we collect through our Services. For example if you choose to engage with a separate application or website that uses our API, or whose API we use, we may receive information about you or your connections from that website or application.

5. Cookies, Log Files and Anonymous Identifiers

- a. When you visit our Website, we may send one or more Cookies – small data files – to your computer to uniquely identify your browser. “Cookies” are text-only pieces of information that a website transfers to an individual’s hard drive or other website browsing equipment for record keeping purposes. A Cookie may convey anonymous information about how you browse the Services to us so we can provide you with a more personalized experience but does not collect Personal Data about you. Cookies allow the Sites to remember important information that will make your use of the site more convenient. A Cookie will typically contain the name of the domain from which the Cookie has come, the “lifetime” of the Cookie,

- and a randomly generated unique number or other value. Certain Cookies may be used on the Sites regardless of whether you are logged in to your account or not.
- b. Session Cookies are temporary Cookies that remain in the Cookie file of your browser until you leave the Site.
 - c. Persistent Cookies remain in the Cookie file of your browser for much longer (though how long will depend on the lifetime of the specific Cookie).
 - d. When we use session Cookies to track the total number of visitors to our Website. This is done on an anonymous aggregate basis (as Cookies do not in themselves carry any personal data).
 - e. We may also employ Cookies so that we remember your computer or device when it is used to return to the Site to help customize your experience. We may associate Personal Data with a Cookie file in those instances.
 - f. We use Cookies to help us know that you are logged on, provide you with features based on your preferences, understand when you are interacting with our website, and compile other information regarding use of our website.
 - g. Third parties with whom we partner to provide certain features on our Site or to display advertising based upon your Web browsing activity use Cookies to collect and store information.
 - h. Our Website may use remarketing services, to serve ads on our behalf across the internet on third party websites to previous visitors to our Sites. It could mean that we advertise to previous visitors who haven't completed a task on our site. This could be in the form of an advertisement on the Google search results page or a site in the Google Display Network. Third-party vendors, including Google, use Cookies to serve ads based on your past visits to our website. Any data collected will be used in accordance with our own privacy policy, as well as Google's privacy policies. To learn more, or to opt-out of receiving advertisements tailored to your interests by our third parties, visit the Network Advertising Initiative at www.networkadvertising.org/choices.
 - i. We may use third-party services such as Google Analytics to help understand use of the Website. These services typically collect the information sent by your browser as part of a web page request, including Cookies and your IP address. They receive this information and their use of it is governed by their respective privacy policies. You may opt-out of Google Analytics for Display Advertisers including AdWords and opt-out of customized Google Display Network ads by visiting the Google Ads Preferences Manager here <https://support.google.com/adsense/answer/142293?hl=en>.
 - j. To provide website visitors more choice on how their data is collected by Google Analytics, Google has developed an Opt-out Browser add-on, which is available by visiting Google Analytics Opt-out Browser Add-on here <https://tools.google.com/dlpage/gaoptout>. For additional information on how Google uses data when you use Google partners' sites or apps, go here: <https://policies.google.com/technologies/partner-sites>.
 - k. You can control the use of Cookies at the individual browser level. Use the options in your web browser if you do not wish to receive a Cookie or if you wish to set your browser to notify you when you receive a Cookie. You can easily delete and manage any Cookies that have been installed in the Cookie folder of your browser by following the instructions provided by your particular browser manufacturer. Consult the documentation that your particular browser manufacturer provides. You may also consult your mobile device documentation for information on how to

disable Cookies on your mobile device. If you reject Cookies, you may still use our website, but your ability to use some features or areas of our Service may be limited.

- i. We cannot control the use of Cookies by third parties (or the resulting information), and use of third-party Cookies is not covered by this policy.
- m. We automatically collect information about how you interact with our Website, preferences expressed, and settings chosen and store it in Log Files. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. We may combine this automatically collected log information with other information we collect about you. We do this to improve services we offer you, to improve marketing, analytics, or website functionality, and to document your consent to receiving Products, services or communications from us or our partners. If we link such information with personally identifiable information in a manner that identifies a particular individual, then we will treat all such information as PII for purposes of this Privacy Policy.
- n. When you use our Website, we may employ Web Beacons (also known as clear GIFs or tracking pixels) to anonymously track online usage patterns. No Personally Identifiable Information from your account is collected using these, Web Beacons.

6. Device Information

When you use our Services through your computer, mobile phone or other device, we may collect information regarding and related to your device, such as hardware models and IDs, device type, operating system version, the request type, the content of your request and basic usage information about your use of our Website, such as date and time. In addition, we may collect information regarding application-level events and associate that with your account to provide customer service. We may also collect and store information locally on your device using mechanisms such as browser web storage and application data caches.

7. Location Information

When you use the Website we may collect your precise location data. We may also derive your approximate location from your IP address.

8. Call and SMS Data

In connection with providing some Service, we may receive call data, including the date and time of the call or SMS message, the parties phone numbers, and the content of the SMS message. You consent to the receipt, collection and storage of this information.

9. Aggregated Data

We may collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data is de-identified or anonymized and does not constitute Personal Data as this data does not directly or indirectly reveal your identity. If we ever combine Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as PII which will only be used in accordance with this Privacy Policy.

10. Children's Privacy

Our Website is not directed at children and we do not knowingly collect personally identifiable information (PII) from persons under the age of 13 in the United States ("U.S."), or under the age of 16 in the European Union ("EU"), the "Protected Age". If you are under the Protected Age, please do not provide us with information of any kind whatsoever. If you are a parent or guardian of a child and have reason to believe that we may have accidentally received information from a child under the Protected Age, please contact us immediately. If we become aware that we have inadvertently received Personal Information from a person under the Protected Age, we will delete such information from our records.

11. The Legal Basis For Collection and Processing Your Personal Information

The legal basis upon which we rely for the collection and processing of your Personal Information are the following:

- a. When accessing our Website, registering for a EKNA account, or making a Product purchase you have given EKNA consent to provide you with our Products and Services and generally to process your information in accordance with this Privacy Policy, and to the transfer of your personal data to other jurisdictions including, without limitation, the United States;
- b. It is necessary for entering into, or performing, the obligations of a contract between you and EKNA, including, without limitation, a purchase order for our Product(s) and our Terms and Conditions agreement which may be accessed by you here: www.elettrotekkabel.us/Terms&Conditions.
- c. It is necessary registering you as a user and a customer of EKNA, managing your account and profile, and authenticating you when you request our Services or make a purchase.
- d. It is necessary for our legitimate interests in the proper administration of our Website and business; analyzing the use of the Website and our Services; assuring the security of our Website and Services; maintaining back-ups of our databases; and communicating with you;
- e. To resolve customer service and technical issues you encounter, to respond to your requests for assistance, comments and questions, to analyze crash information, to repair and improve the Services and provide other customer support;
- f. To send communications via email and within the Services, including, for example, responding to your questions and requests, providing customer support, and sending you technical notices, Product updates, and security alerts;
- g. To send promotional communications that you have consented to receive or have expressed a legitimate interest in receiving;
- h. It is necessary for our legitimate interests in the protection and assertion of our legal rights, and the legal rights of others, including you; and
- i. It is necessary for our compliance with certain legal provisions which may require us to process your personal data. By way of example, and without limitation, we may be required by law to disclose your personal data to law enforcement or a regulatory agency.

12. Protective Measures We Use

We protect your information using commercially reasonable technical and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure

and alteration. Some of the safeguards we use are firewalls and data encryption, physical access controls to our data centers, and information access authorization controls. Although we take measures to secure your information, we do not promise, and you should not expect, that your

Personal Data, or searches, or other information will always remain secure. We cannot guarantee the security of our information storage, nor can we guarantee that the information you supply will not be intercepted while being transmitted to and from us over the Internet including, without limitation, email and text transmissions. In the event that any information under our control is compromised as a result of a breach of security, we will take reasonable steps to investigate the situation and where appropriate, notify those individuals whose information may have been compromised and take other steps, in accordance with any applicable laws and regulations.

13. How We Use Information We Collect

Our primary purpose in collecting, storing, using and disclosing your Information is for our legitimate business purposes and to provide you with a safe, smooth, efficient, and customized experience. We will not rent, sell, lease or barter your information to anyone unless you grant us explicit permission for this information to be shared in that manner.

We will use this information in order to:

- a. Operate and provide our Website;
- b. Receive, process and fulfill your purchase order for our Products;
- c. Ship the Product(s) you purchase to you;
- d. Process returns, exchanges, warranty claims and refunds.
- e. Improve our technology, internal operations, systems, Products and Website.
- f. Create and develop new Products and Services and add customized features to existing Services.
- g. Provide users with customer support including sending you purchase order confirmations, technical notices, security alerts, and administrative messages.
- h. Resolve problems and disputes and engage in other legal and security matters.
- i. Protect, investigate, and deter against fraudulent, unauthorized use or illegal activity.
- j. Enforce our Terms and Conditions and any terms and conditions for the sale of our Products.
- k. Send you communications we think will be of interest to you, including promotional communications by email, text message or postal mail, and to show you advertisements for Products or Services, special product promotions, news, and events of EKNA.
- l. Verify your identity and prevent impersonation and possible fraudulent activity.

14. How We Share Information We Collect

- a. We share the information we collect about you as described in this Privacy Policy, or as described at the time of collection or sharing, as follows:
 - i. With third party Service Providers to enable them to provide the Services you request. Access to your Personal Information by these Service Providers is limited to the information reasonably necessary in order for them to perform their limited function for us. We also require that these Service Providers (a) protect the privacy of your Personal Information consistent with this Privacy Policy, and (b) not use or disclose your

- Personal Information for any purpose other than providing us with products or services for which we contracted.
- ii. With third parties with whom you choose to let us share information, for example other websites or apps that integrate with our API or Services, or those with an API or Service with which we integrate.
 - iii. With our subsidiaries and affiliated entities that provide services or conduct data processing on our behalf, or for data verification, data centralization and/or logistics purposes. Any information relating to you that we provide to our subsidiaries and affiliated entities will be treated by those parties in accordance with the terms of this Privacy Policy.
 - iv. With Service Providers that may now or in the future provide payment processing services on our behalf. Access to your Personal Information by these Service Providers is limited to the information that is reasonably necessary in order for them to perform their limited function for us. We also require that these Service Providers (a) protect the privacy of your Personal Information consistent with this Privacy Policy, and (b) not use or disclose your Personal Information for any purpose other than providing us with products or services for which we contracted.
 - v. With vendors, consultants, marketing partners, and other Service Providers who need access to such information to carry out work on our behalf. Access to your Personal Information by these Service Providers is limited to the information reasonably necessary in order for them to perform their limited function for us. We also require that these Service Providers (a) protect the privacy of your Personal Information consistent with this Privacy Policy, and (b) not use or disclose your Personal Information for any purpose other than providing us with products or services for which we contracted.
 - vi. In response to a request for information by a competent authority if we believe disclosure is in accordance with, or is otherwise required by, any applicable law, regulation, court or legal process.
 - vii. With law enforcement officials, government authorities, or other third parties if we believe your actions are inconsistent with our Terms of Use or policies, or to protect the rights, property, or safety of us or others.
 - viii. In connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or into another company. We require that these parties (a) protect the privacy of your Personal Information consistent with this Privacy Policy, and (b) not use or disclose your Personal Information for any purpose.
 - ix. If we otherwise notify you and you consent to the sharing; and,
 - x. In an aggregated and/or de-identified form which cannot reasonably be used to identify you. We only use such data in the aggregate form and our analytical services do not record any Personal Information.
- b. We may disclose Your Information as follows:
- i. To any person who, in our reasonable judgment, is authorized to receive Your Information as your agent, including as a result of your business dealings with that person (for example, your attorney).
 - ii. As required by law or ordered by a court, regulatory, or administrative agency.

- iii. As we deem necessary, in our sole discretion, if we believe that you are violating any applicable law, rule or regulation, or are otherwise interfering with another's rights or property, including, without limitation, our rights or property.
- iv. To enforce our Terms and Conditions, this Privacy Policy, and any other applicable agreements and policies.

15. Analytic Services Provided By Others

We may allow others to provide audience measurement and analytics services for us, to serve advertisements on our behalf across the Internet, and to track and report on the performance of those advertisements. These entities may use Cookies, Web Beacons, software development kits (SDKs), and other technologies to identify your device when you visit our Site and use our Services, as well as when you visit other online sites and services.

16. Links to Third-Party Websites

- a. Our website, as well as the email messages sent with respect to our Products and Services, may contain links or access to websites operated by third parties that are beyond our control. Links or access to third parties from our website are not an endorsement by us of such third parties, or their websites, applications, products, services, or practices. We are not responsible for the privacy policy, terms and conditions, practices or the content of such third parties. These third-parties may send their own Cookies to you and independently collect data.
- b. If you visit or access a third-party website, application or other property that is linked or accessed from our Website, we encourage you to read any privacy policies and terms and conditions of that third party before providing any personally identifiable information. If you have a question about the terms and conditions, privacy policy, practices or contents of a third party, please contact the third party directly.

17. Promotional Information Opt Out

You may opt out of receiving promotional messages from us at any time by following the instructions in those messages sent to you including emails, or by contacting us at any time using the Contact Us information at the end of this Privacy Policy. In doing so, you elect not to receive correspondence from us or have Your Information shared with other entities for their marketing purposes. If you opt out, we may still send you non-promotional communications, such as those about your account, about Services you have requested, or our ongoing business relations.

18. International Privacy Practices

In order to provide our Products and Services to you, we may send and store your Personal Data outside of the country where you reside or are located, including to the United States. Accordingly, if you reside or are located outside of the United States, your Personal Data may be transferred outside of the country where you reside or are located, including countries that may not, or do not, provide the same level of protection for your Personal Data. We are committed to protecting the privacy and confidentiality of Personal Data when it is transferred. If you reside or are located within the European Union ("EU") or European Economic Area ("EEA") and such transfers occur, we take appropriate steps

to provide the same level of protection for the processing carried out in any such countries as you would have within the EU and EEA to the extent feasible under applicable law. By accessing and using the EKNA Website or our Services, users who reside, or are located, in countries outside of the United States, agree and consent to the transfer to, and processing of, Personal Data on servers located outside of the country where they reside, and assume the risk that the protection of such information may be different, and may be less protective, than those required under the laws of their residence or location.

19. Do Not Track Settings

Some web browsers may give you the ability to enable a "do not track" feature that sends signals to the websites you visit, indicating that you do not want your online activities tracked. This is different than blocking or deleting Cookies, as browsers with a "do not track" feature enabled may still accept Cookies. There currently is no accepted standard for how to respond to this signal, and we do not take any action in response to this signal.

20. Sharing Information With Law Enforcement

EKNA is committed to cooperating with law enforcement while respecting each individual's right to privacy. If EKNA receives a request for user account information from a government agency investigating criminal activity, we will review the request to be certain that it satisfies all legal requirements before releasing information to the requesting agency.

21. Our Information Retention Policy

Unless you request that we delete certain information, we retain the information we collect for as long as your account with EKNA is active or as needed to provide you services. We will only retain your Personal Data for so long as we reasonably need to unless a longer retention period is required by law (for example for regulatory purposes).

22. General Data Protection Regulation (GDPR); Your Access and Rights to Your Personal Information

Under the General Data Protection Regulation (GDPR), residents of the European Union ("EU") or European Economic Area ("EEA") have certain rights in relation to Personal Information we collect. You can exercise any of the following rights by contacting us using any of the methods in the Contact section below. We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

- a. **Right to Access Your Personal Data.** You have the right to access information held about you for the purpose of viewing and in certain cases updating or deleting such information. Furthermore, if you prefer that we do not share certain information as described in this Privacy Policy, you can direct us not to share that information. We will comply with an individual's requests regarding access, correction, sharing and/or deletion of the personal data we store in accordance with applicable law. To make changes to your account affecting your personal

information contact us at the email address in our Contact section below. For any deletion, non-sharing or update request, we will make the changes as soon as practicable; however, this information may stay in our backup files. If we cannot make the changes you want, we will let you know and explain why.

- b. **Right of Correction or Completion of Your Personal Data.** If personal information we hold about you is not accurate, out of date or incomplete, you have a right to have the data corrected or completed. To make corrections to your account please contact us at the email address in our Contact section below.
- c. **Right of Erasure or Deletion of Your Personal Data.** In certain circumstances, you have the right to request that personal information we hold about you is deleted. If we cannot delete the information you want, we will let you know and explain why. To request deletion of information please contact us at the email address in our Contact section below.
- d. **Right to Object to or Restrict Processing of Your Personal Data.** In certain circumstances, you have the right to object to our processing of your personal information. For example, you have the right to object to use of your personal information for direct marketing purposes. Similarly, you have the right to object to use of your personal information if we are processing your information on the basis of our legitimate interests and there are no compelling legitimate grounds for our processing which supersede your rights and interests. You may also have the right to restrict our use of your personal information, such as in circumstances where you have challenged the accuracy of the information and during the period where we are verifying its accuracy. To object to or restrict processing please contact us at the email address in our Contact section below.
- e. **Right to Data Portability or Transfer of Your Personal Data.** You have the right to be provided with a copy of the information we maintain about you in a structured, machine-readable and commonly used format. To receive a copy of the information we maintain about you please contact us at the email address in our Contact section below.
- f. **Right to Withdrawal of Consent.** If you have given your consent to us to process and share your Personal Information after we have requested it, you have the right to withdraw your consent at any time. To withdraw your consent please contact us at the email address in our Contact section below.
- g. **Right to Complain.** You have the right to file a complaint regarding our data protection practices with a supervisory authority. Please see this directory for contact details: https://edpb.europa.eu/about-edpb/board/members_en.

23. Your Nevada Consumer Privacy Rights

EKNA does not sell consumers' covered personal information for monetary consideration (as defined in Chapter 603A of the Nevada Revised Statutes). However, if you are a Nevada resident, you have the right to submit a request directing us not to sell your Personal Information. To submit such a request, please contact us using the information in the "Contact Us" section at the end of this document.

24. Your Canadian Privacy Rights

Residents of Canada are permitted to request and obtain from us information regarding the existence, use, and disclosure of their personal information as well as access to that information (subject to certain exceptions pursuant to applicable laws). Without limiting the above, residents of Canada will, upon request:

- a. Be informed of whether we hold personal information about you.
- b. Be provided with an account of third parties to which we have disclosed personal information about you;
- c. Be able to challenge the accuracy and completeness of personal information about you and have it amended as appropriate; and
- d. Be provided with information about our policies and practices with respect to the management of personal information, including: the name or title, and address, of the person who is accountable for our privacy policies and practices; the means of gaining access to personal information; a description of the type of personal information held by us, including a general account of its use; a copy of any brochures or other information, if available that explain our policies, standards, or codes; and what personal information is made available to related organizations.

25. Your Colorado, Connecticut, Virginia, and Utah Privacy Rights

The disclosures in this section apply solely to individual residents of the States of Colorado, Connecticut, Virginia, and Utah. Those rights include:

- a) Right to Access Information. You have the right to access and obtain a copy of your personal data.
- b) Right to Request Deletion. You have the right to request that we delete personal data provided by or obtained about you.
- c) Right to Correct. You have the right to correct inaccuracies in your personal data.
- d) Right to Opt-Out of Targeted Advertising. You may ask us not to use or disclose your information for the purposes of targeting advertising to you based on your personal data obtained from your activity across different businesses, services, websites, etc.
- e) Right to Opt-Out of Personal Information Sales to third parties.

To submit such a request, please contact us using the information in the “Contact Us” section at the end of this document.

26. Your California Consumer Privacy Rights; Shine the Light Act

California Civil Code Section 1798.83 entitles California residents to request information concerning whether a business has disclosed Personal Information to any third parties for their direct marketing purposes. California residents may request and obtain from us once a year, free of charge, information about the personal information, if any, we disclosed to third parties for direct marketing purposes within the immediately preceding calendar year. If applicable, this information would include a list of the categories of personal information that was shared and the names and addresses of all third parties with which we shared information within the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing using the information in the How to Contact Us section at the end of this Privacy Policy.

27. Contact Us

If you have any questions or if you would like to contact us about our processing of your Personal Data, including exercising your rights as outlined above, please contact us by any of the methods below. When you contact us, we will ask you to verify your identity.

Contact name: Data Protection Officer
Email: info.us@ek-group.com
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