

**ettitude**  
**Privacy Policy**

Effective Date: July 22, 2020

Ettitude Holdings, Inc. is a Delaware corporation and is referred to in this Privacy Policy as “ettitude,” “Company,” “we,” “our,” and “us”. ettitude is committed to respecting the privacy of our visitors and users (collectively, “Users” or “you”). This Privacy Policy describes how your personal information is collected, used, and shared when you visit or make a purchase from an ettitude website, including [www.ettitude.com](http://www.ettitude.com), mobile application, or social media page; use one of our services or tools; or otherwise connect with us offline such as via email or telephone (these activities are collectively referred to as the “Site”). Please read this Privacy Policy carefully to understand our policies and practices regarding your Personal Information. If you do not agree with our policies and practices, your choice is not to use our Site. By accessing or using the Site, you agree to this Privacy Policy. This Privacy Policy may change from time to time (see [Changes](#)). Your continued use of our Site after we make changes is deemed to be acceptance of those changes, so please check the Privacy Policy periodically for updates.

#### POLICY HIGHLIGHTS

- o We collect personal information from users of our Site that identifies you as an individual when it is voluntarily provided by you, such as your name, address, telephone number and email address.

- o We automatically collect browsing information and other information from users of our Site that does not identify you as an individual[MA3] , but may identify your device, such as information about your browsing activities, geolocation and information about the devices you use to access the Sites.
- o This information is collected to provide, manage, analyze and improve the features and functions available on or through the Site, complete your purchases, fulfill orders, market relevant products to you, prevent fraud or misuse, and for our internal business purposes.
- o Information about our practices is further described below.

## PERSONAL INFORMATION WE COLLECT

When you visit the Site, we automatically collect certain information about your device, including information about your web browser, IP address, time zone, and some of the cookies that are installed on your device. Additionally, as you browse the Site, we collect information about the individual web pages or products that you view, what websites or search terms referred you to the Site, and information about how you interact with the Site. We refer to this automatically-collected information as “Device Information”.

We collect Device Information using the following technologies:

- “Cookies” are data files that are placed on your device or computer and often include an anonymous unique identifier. For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>.

- “Log files” track actions occurring on the Site, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
- “Web beacons”, “tags”, and “pixels” are electronic files used to record information about how you browse the Site.

Additionally, when you establish an account on the Site, make a purchase or attempt to make a purchase through the Site, we collect certain information from you, including your name, billing address, shipping address, account password, payment information, email address, and phone number. We refer to this information as “Order Information”. When we talk about “Personal Information” in this Privacy Policy, we are talking both about Device Information and Order Information.

#### HOW DO WE USE YOUR PERSONAL INFORMATION?

We use the Order Information that we collect generally to fulfill any orders placed through the Site (including processing your payment information, arranging for shipping, and providing you with invoices and/or order confirmations). Additionally, we use this Order Information to:

- Communicate with you;
- Notify you about an out-of-stock item,
- Screen our orders for potential risk or fraud;
- Administer promotions, surveys or other Site features; and
- When in line with the preferences you have shared with us, provide you with information or advertising relating to our products or services.

We use the Device Information that we collect to help us screen for potential risk and fraud (in particular, your IP address), and more generally to improve and optimize our Site (for example, by generating analytics about how our customers browse and interact with the Site, and to assess the success of our marketing and advertising campaigns).

We may store or process your Personal Information on servers located outside of your home country. By using the Site, you consent to the transfer of your Personal Information to such servers.

#### SHARING YOUR PERSONAL INFORMATION

Generally, we share your Personal Information only with our employees, contractors, agents, service providers, and third-parties that need to know such information to support or provide services through the Site; and have agreed not to disclose it to others. For example, we share your Personal Information with:

- o Shopify to power our online store -- you can read more about how Shopify uses your Personal Information here: <https://www.shopify.com/legal/privacy>.
- o Google as we use Google Analytics to help us understand how our customers use the Site -- you can read more about how Google uses your Personal Information here: <https://www.google.com/intl/en/policies/privacy/>.

You can also opt-out of Google Analytics here:

<https://tools.google.com/dlpage/gaoptout>.

- o Kalviyo to provide email, messaging and marketing information to our customers -- you can read more about how Kaviyo uses your Personal Information here: <https://www.klaviyo.com/privacy/policy>.
  
- o Hotjar to help us understand and analyze the effectiveness of our website -- you can read more about how Hotjar uses your Personal Information here: <https://help.hotjar.com/hc/en-us/articles/360045420794-Privacy-FAQs>
  
- o Narvar to help manage your post purchase experience with ettitude, and process any product returns and exchanges -- you can read more about how Narvar uses your Personal Information here: <https://corp.narvar.com/privacy-policy>
  
- o Yotpo to enable and publish product reviews -- you can read more about how Yotpo uses your Personal Information here: <https://www.yotpo.com/yotpo-privacy-guide/>.
  
- o Rakuten Advertising to help market our products through their affiliate marketing program -- you can read more about how Rakuten Advertising uses your Personal Information here: <https://rakutenadvertising.com/legal-notices/services-privacy-policy/>, and manage how Rakuten Advertising uses your Personal Information here: <https://rakutenadvertising.com/legal-notices/subject-requests/>.
  
- o Courier, fulfillment and logistics providers to deliver purchased items to you.

We may also share your Personal Information in certain other circumstances, such as to comply with applicable laws and regulations, to respond to a subpoena, search

warrant or other lawful requests for information we receive, or to otherwise protect our rights.

## BEHAVIORAL ADVERTISING

As described above, we use your Personal Information to provide you with targeted advertisements or marketing communications we believe may be of interest to you. For more information about how targeted advertising works, you can visit the Network Advertising Initiative's ("NAI") educational page at

<http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>

You may opt out of receiving promotional, event, news, and/or marketing communications at any time by emailing your opt-out request to [care@ettitude.com](mailto:care@ettitude.com).

You can also opt out of targeted advertising by using the links below:

- Facebook: <https://www.facebook.com/settings/?tab=ads>

- Google: <https://www.google.com/settings/ads/anonymous>

- Bing:

<https://advertise.bingads.microsoft.com/en-us/resources/policies/personalized-ads>

Additionally, you can opt out of some of these services by visiting the Digital

Advertising Alliance's opt-out portal at: <http://optout.aboutads.info/>.

## DO NOT TRACK

California's "Do Not Track" Notice: "Do Not Track" ("DNT") is a preference you can set in your web browser to let the websites you visit know that you do not want them collecting information about you. The Site does not currently respond to "Do Not Track" settings. For further details regarding DNT, visit <http://donottrack.us>. Please note that

our Services require certain information in order to function properly, so some features on the Site may not be available for your use if you opt out of all information sharing. In addition, third parties may collect personal information about your online activities over time and across different websites when you visit the Site or other online websites and services. To find out more about “Do Not Track,” you may wish to visit <http://www.allaboutdnt.com>.

## PROTECTING YOUR INFORMATION

We take reasonable measures to protect against the unauthorized access, use, alteration, or destruction of personal information. However, it remains possible that third parties may unlawfully intercept or access transmissions or private communications and may abuse or misuse your personal information that they collect from the Site. Although we work hard to protect your privacy, we cannot guarantee that your Personal Information or private communications will always remain private. The safety and security of your information also depends on you. If you have chosen an account password, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. By using the Site, you expressly acknowledge and agree that we do not guarantee the security of any data provided to or received by us through the Site and that any personal information, general information, or other data or information received from you to us is provided to us at your own risk, which you expressly assume.

## THIRD PARTY WEBSITES

Our site may contain links to other websites. If you choose to visit other websites, we are not responsible for the privacy practices or content of those other websites, and it

is your responsibility to review the privacy policies at those websites to confirm that you understand and agree with their policies.

## CHILDREN UNDER THE AGE OF 16

Our Site is not intended for children under 16 years of age. No one under age 16 may provide any Personal Information to or on the Site. We do not knowingly collect Personal Information from children under 16. If you are under 16, do not provide any information to us through the Site, use any of the interactive or public comment features of the Site or provide any information about yourself to us, including your name, address, telephone number, email address or user name you may use. If we learn we have collected or received Personal Information from a child under 16 without verification of parental consent, we will use all reasonable efforts to delete such information. If you believe we might have any information from or about a child under 16, please contact us at [care@ettitude.com](mailto:care@ettitude.com).

## YOUR RIGHTS

If you are a resident of a jurisdiction that conveys specific rights to you regarding your Personal Information (such as the European Union), you may have the right to access the personal information we hold about you and to ask that your personal information be corrected, updated, or deleted. If you would like to exercise your right under your specific jurisdiction, please contact us through the contact information below.

Additionally, if you are a European resident we note that we are processing your information in order to fulfill contracts we might have with you (for example if you make an order through the Site), or otherwise to pursue our legitimate business interests

listed above. Additionally, please note that your information will be transferred outside of Europe, including to Australia, Canada and the United States.

California's "Shine the Light" law (Civil Code Section § 1798.83) permits certain users of our Site that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please contact us through the contact information below.

#### DATA RETENTION

When you place an order through the Site, we will maintain your Order Information for our records unless and until you ask us to delete this information.

#### CHANGES

We may update this privacy policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal or regulatory reasons.

#### CONTACT US

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact us by e-mail at [care@ettitude.com](mailto:care@ettitude.com) or by mail using the details provided below:

Ettitude Holdings, Inc.

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